



## Privacy Policy

We are committed to ensuring the security of your personal data and protecting your privacy. This privacy statement addresses how we handle the personally identifiable information (“Personal Data”) that Talking Medicines collects and processes about data subjects through the Services that we offer to our Customers. It will also tell you about your privacy rights and how the law protects you.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### Who we are

We are Talking Medicines Limited. We are a company incorporated and registered in Scotland. Our company number is SC447227. Our address is:

- Office Address: BECO Building, 58 Kingston Street, Glasgow, G5 8BP.
- Mailing Address: c/o Johnston Carmichael, 227 West George Street, Glasgow, G2 2ND

When we refer to “**Talking Medicines**” or “**we**”, “**us**” or “**our**” in this policy, we are referring to Talking Medicines Limited and the US Subsidiary Talking Medicines Inc., a Delaware corporation having its principal place of business at 95 Christopher Columbus Drive, 16th Floor, Jersey City, NJ 07302. We are the ‘independent controller’ in relation to the personal data we access from data aggregators, which means we determine the purposes and the way in which your personal data is, or will be, processed and are responsible for it. We are the ‘processor’ in relation to the personal data we access from Customers, which means we are responsible for carrying out the processing of the data under the specific instructions of the data controller which in this circumstance would be the Customer.

### How to contact us

Questions, comments and requests regarding this policy are welcomed. You may either use our contact form to get in touch with us or you may write to us at:

- Email: [info@talkingmedicines.com](mailto:info@talkingmedicines.com)
- Office Address: BECO Building, 58 Kingston Street, Glasgow, G5 8BP.
- Mailing Address: c/o Johnston Carmichael, 227 West George Street, Glasgow, G2 2ND

### About our service

Talking Medicines is a data tech company serving the healthcare sector.

Our service (“**Service**”) is designed to help our Customers unlock strategic intelligence within Conversational Data. This means we offer Customers access to aggregated patterns, trends, and analytics of Conversational data. This includes the process of analyzing and extracting insights from natural language conversations. The Service involves our web-based platforms, applications and solutions of any sort. Our mission is

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to ultimately improve patient outcomes through actionable intelligence which will drive more effective patient care and support.

All data is handled to a high level of quality and compliance. Talking Medicines services are designed to show aggregated trends and patterns. We are committed to the pseudonymisation and deidentification of data subject which could be patients.

The following table provides some key definitions to help explain the Service and our privacy policy more clearly.

<b>Customer</b>	means a healthcare advertising agency or healthcare company or any other party which we contract with to provide our Service
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### **Purpose of this privacy policy**

This privacy policy aims to give you information on how we collect and process your personal data so that you can be confident that you know what your personal data is being used for and that it is being kept safe.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

### **How is your personal data collected?**

We use different methods to collect data from and about you including through:

<b>Data aggregators</b>	<p>We work with data aggregators to access publicly available information. This means that the only information that we have access to is information that data subjects have published or made manifestly available publicly.</p> <p>This information is then ingested and stored in our database. We offer access to aggregated patterns, trends, and analytics of the data within that database, to Customers.</p> <p>This allows Customers to understand and learn more about their brand, brand equity, their consumer base, their competitors, and more, in order to execute marketing decisions with more accuracy and clarity.</p>
<b>Customer Data</b>	<p>We also directly contract with Customers to provide aggregated patterns, trends and analytics on their data.</p>

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Talking Medicines are data processor in these circumstances.

### What information do we collect about you

We may collect and process the following different kinds of personal data about you which lie in these categories:

<b>Names</b>	this could be your name, username, handle or any other information available
<b>Content</b>	the content you have published or provided to our Customer for example, transcripts, posts and opinions
<b>Geolocation</b>	this is your location

If you want any further information about the information we collect, how we might collect or use your personal data, please [contact us](#).

### How do we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the **contract** we have entered into with you or to take steps at your request prior to entering into a contract (e.g. when you register to use our Service).
- Where we have your prior **consent** to use your personal data.
- Where we need to comply with a **legal or regulatory obligation**.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We need to have further justification for collecting, storing and using special categories of personal data and we have identified this where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
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<p>To provide our Service</p>	<p>Categories of data referenced above.</p>	<ul style="list-style-type: none"> <li>• Necessary in order to perform our contract with the Customer</li> <li>• To comply with our legal obligations</li> <li>• Necessary for our legitimate interest – to run our business</li> </ul> <p>We do not use algorithms to make automated decisions about you in violation of applicable law or in a way that produces a significant legal effect.</p> <p>Our legal basis for this data processing is legitimate interest in running our business and providing our Services to our Customers.</p> <p>Whenever we process sensitive data, we do so only because you have made that information manifestly public.</p> <p>Our customers have a legitimate interest in accessing this the aggregated trends, patterns and analytics in order to understand their consumers and measure engagement with their brands.</p> <p>This legal basis requires a balancing of the legitimate interests of the data controller with the interests or fundamental rights and freedoms of the data subject.</p> <p>The data that Talking Medicines processes is</p>
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		<p>manifestly made public by the data subject themselves. Talking Medicines believe that the interests, fundamental rights, and freedoms of the data subjects are not prejudiced or overridden in the context of its processing.</p> <p>The data subjects have significant levels of control over the availability of their personal data on the public platforms. The data subjects have control of the content of their posts, the platforms they use, and the privacy settings that apply to their posts. These posts are manifestly made public.</p>
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We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Disclosure of your information

We may have to share your personal information for the purposes set out above with the following third parties:

Third party	Detail
<b>Company</b>	Including the Talking Medicines Inc subsidiary and any affiliates
<b>External (For Business Purposes)</b>	Including: <ul style="list-style-type: none"> <li>• Customers – for the purpose of providing our Services</li> <li>• Partners, Suppliers, Subcontractors – for the performance of contracts</li> <li>• Lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services – for the performance of contracts</li> </ul>

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	<ul style="list-style-type: none"><li>• Corporate Partners and Prospective buyers - if a third party acquires us or our assets, your Personal Data may be part of the transferred company or assets. Includes third parties who may invest in our business or to whom we may choose to sell, transfer, or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.</li><li>• Authorities - including regulators and other authorities who require reporting of processing activities in certain circumstances.</li></ul>
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We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International transfers**

Some of our external third parties may, from time to time, be based outside the United Kingdom (UK)) so their processing of your personal data will involve a transfer of data outside the UK.

If we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The country has been deemed to provide an adequate level of protection for personal data by the Information Commissioner's Office. For further details, see *Information Commissioner's Office: International transfers after the UK exit from the EU Implementation Period*.
- If we use certain service providers based outwith the UK, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the UK, and may make changes to such specific contracts so they make sense in a UK context. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- If we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EU and the US, so long as such providers have updated their public commitments to specifically state that their commitment extends to personal data received from the UK. For further details, see *European Commission: EU-US Privacy Shield*.
- In any other case, we will obtain your explicit consent before any transfer takes place.

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Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## Data Security

We have put in place appropriate security measures in accordance with industry best practice to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

All information you provide to us is stored on secure servers. The servers that hold your data have administrative, technical, and physical controls to safeguard your data.

## How long we store your personal data for

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where we anonymise your personal data (i.e. so that it can no longer be associated with you) for further research or statistical purposes, then we may use this information indefinitely without further notice to you.

## Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please read through the table below to find out more about these rights.

Your right	What this means
Access to your information	You have the right to ask for a copy of the information which we hold on you (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
Correcting personal data	You have the right to request that we correct personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold corrected, though we may need to verify the accuracy of the new data that you provide to us.

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	<p>It is important that the personal data we hold about you is accurate and current, so please keep us informed if your personal data changes during your relationship with us.</p>
<p>Deleting personal data</p>	<p>You may ask us to delete or remove personal data where there is no good reason for us continuing to process it. This is more commonly known as the 'right to be forgotten'. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.</p> <p>Please note, however, that we may not always be able to comply with your request to delete or remove personal data for specific legal reasons which will be notified to you, if applicable, at the time of your request.</p>
<p>Objecting to processing</p>	<p>You have the right to stop us processing your personal data for direct marketing purposes. We will always inform you if we intend to use your personal data for such purposes, or if we intend to disclose your information to any third party for such purposes. You could then exercise your right to prevent such marketing by <a href="#">contacting us</a>.</p> <p>You may also object to us processing your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.</p>
<p>Restriction of processing</p>	<p>This enables you to ask us to suspend the processing of your personal data in the following scenarios:</p> <ul style="list-style-type: none"> <li>• if you want us to establish the data's accuracy;</li> <li>• where our use of the data is unlawful but you do not want us to erase it;</li> <li>• where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or</li> <li>• you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</li> </ul>





Transferring your personal data	<p>In certain circumstances, you may request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.</p> <p>Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.</p>
Withdrawing consent	<p>Where we are relying on consent to process your personal data you can withdraw your consent at any time. Please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent.</p>
Review by an independent authority	<p>You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office. If you do have a complaint, we would appreciate the chance to deal with your concerns before you approach the ICO, so please do <a href="#">contact us</a> in the first instance if possible.</p>

If you wish to exercise any of the rights set out above, please [contact us](#). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### California Residents

The categories of personal information about California residents that we may collect and disclose to others for a business purpose are listed and detailed above. We collect these categories for the purposes described and with the parties detailed. Please see your rights above.

### Changes to our privacy policy

This version was last updated Q1 2024.

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