



## BACKGROUND:

The Drug Safety Research Unit (“DSRU”, “us”, “we”, “our”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits the DSRU Website, <http://www.dsru.org> (“our site”), and pages within our site that have data collection forms, <https://researchhub.dsru.org/>, <http://www.dsru.org/courses/> and <https://hub.dsru.org/> and will only collect and use personal data in ways that are described here and in a way that is consistent with our obligations and your rights under the law.

## 1. Definitions and Interpretation

The DSRU Privacy Policy has the following terms which have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of our site;
“Cookie”	means a small text file placed on your computer or device by our site when you visit certain parts of our site and/or when you use certain features of our site. Details of the Cookies used by our site are set out in Part 14, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

## 2. Information About Us

Our site is operated by the Drug Safety Research Trust, a charity registered in England under charity number 327206.

Registered address: Bursledon Hall, Blundell Lane, Southampton, Hampshire SO31 1AA

## 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of our site. Our site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.



## 5. What Are Your Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data;
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this;
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete;
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have;
- e) The right to restrict (i.e. prevent) the processing of your personal data;
- f) The right to object to us using your personal data for a particular purpose or purposes;
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases;
- h) Rights relating to automated decision-making and profiling. **We do not use your personal data in this way.**

For more information about our use of your personal data or exercising your rights as outlined above, you can contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 6. What Data Do We Collect?

Depending upon your use of our site and the pages visited, we may collect data as follows:

- Personal data relating to a user account – Name telephone, email and other meta-data relating to the user Account;
- Personal data relating to a course or research study you may be participating in – Site name, Job Title, Site email and Site telephone and other meta-data relating to the study;
- Personal and research data from bespoke Data Collection Forms related to a specific drug safety research study, details of which will be outlined in the relevant study specific pages, or a more general survey for other research purposes that you have agreed to participate in;
- Information that you provide by filling in forms on our site when making a booking for courses or requesting further information. This may include your personal data, payment details or your medical data;
- Details of transactions you carry out through our site and of the processing of



your bookings

- We may ask you for information when you report a problem with our site;
- If you contact us, we may keep a record of that correspondence;
- Details of your visits to our site and the resources that you may access.

See Part 14 on our use of Cookies and similar technologies.

## 7. How Do We Use Your Personal Data?

Under Data Protection legislation, we must always have a lawful basis for using personal data. This may be that the data is necessary for our performance of a contract with you, you have consented to our use of your personal data, or because it is in our legitimate business interests to use it.

Your personal data may be used for the following purposes:

- To ensure that content from our site is presented in the most effective manner for you and your device;
- Providing and managing your Account;
- Providing and managing your access to different subject areas on our site;
- To assist us in our internal administration and analyses;
- Supplying our products and services to you where permitted by law and if you have consented for us to do so. Your personal details are required in order for us to enter into a contract with you;
- To carry out our obligations arising from any contracts entered into between you and us.
- Communicating with you. This may include responding to emails or calls from you or notifying you of any changes to our services or sending Alerts or Notices via our site;
- Supplying you with information by email that you have opted-in to. You may unsubscribe or opt-out at any time by contacting us using the details provided in Part 15.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under Data Protection legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 8. How Long Will We Keep Your Personal Data?

All personal data is processed and stored securely for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under Data Protection legislation at all times.

## 9. How and Where Do We Store or Transfer Your Personal Data?

We will only store or transfer personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and



Liechtenstein. This means that all personal and research data will be fully protected under Data Protection legislation or to equivalent standards by law.

## 10. Do We Share Your Personal Data?

We do not sell, rent or trade your personal data to third-parties.

We may share pseudonymised data with other third-party companies within the EEA only for specific study research purposes which will be outlined in the study section of our site. We will take all the necessary steps to ensure that your data is handled safely, securely, and in accordance with your rights, our obligations, and the third-party's obligations under the law, as described above in Part 9.

We may share pseudonymised delegate details for our short training courses with speakers who are outside of the EEA to allow the speaker to have an idea of the background of the attending delegates. We will take all the necessary steps to ensure that your data is handled securely as it would be within the EEA and UK Data Protection legislation as explained in Part 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may also be required to use your personal data in order to enforce our rights against you in respect of any transactions which you may enter into with us. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 11. How Can You Control Your Personal Data?

11.1 In addition to your rights under Data Protection legislation, set out in Part 5, when you submit personal data via our site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes including the ability to opt-out of receiving emails from us. You may do this by unsubscribing using the links provided in our emails or at the point of providing your details or by managing your Account or contacting us by one of the methods outlined in Part 15 below.

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. Can You Withhold Information?

You may access certain areas of our site without providing any personal data at all. However, to use all features and functions available on our site you may be required to submit or allow for the collection of certain data.

Cookies are required for our site to function and opting-out of receiving Cookies will mean you will not be able to visit our site. For more information, see Part 14.



## 13. How Can You Access Your Personal Data?

If you want to know what personal data we have about you then you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will aim to respond to your subject access request within fourteen days of receipt but no later than one month. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 14. How Do We Use Cookies?

Our site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on our site are used in accordance with current Cookie Law.

Certain features of our site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that our site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.



The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Necessary
ASP.NET_SessionId	Session Cookie.	Yes
.AspNet.ApplicationCookie	Session Cookie.	Yes
__RequestVerificationToken	Anti Forgery Token used to protect against CSRF attacks.	Yes
.ASPXAUTH	Authenticated user Cookie.	Yes
_ga	Google analytics Cookie used to distinguish users. It expires after 2 years.	No
_gat	Google analytics Cookie used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>. It expires after 1 minute.	No
_gid	Google analytics Cookie used to distinguish users. It expires after 24 hours.	No
Wordpress cookies	<a href="https://codex.wordpress.org/WordPress_Cookies">https://codex.wordpress.org/WordPress_Cookies</a>	Yes
WooCommerce cookies: 1. woocommerce_cart_hash 2. woocommerce_items_in_cart 3. wp_woocommerce_session_	To keep track of cart data when purchasing from our site. The first two cookies contain information about the cart as a whole and helps WooCommerce know when the cart data changes. The third cookie contains a unique code for each customer so that it knows where to find the cart data in the database for each customer. No personal information is stored within these cookies.	Yes
Cookie_Accepted	To log that the Cookie notice has been accepted.	Yes



**15. How Do You Contact Us?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of: The Head of Data Management

Email address: headofdm@dstru.org.

Telephone number: 023 80408600.

Postal address: Bursledon Hall, Blundell Lane, Southampton, Hampshire  
SO31 1AA.

**16. Changes to the Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be immediately posted on our site and we recommend that you check this page regularly to keep up-to-date.