

Background

This Privacy Notice sets out the basis on which Lucid Group Communications Limited and the companies in the Group (Lucid Group)* collects, uses and stores your personal data, as a data controller.

We take our obligations in respect of the privacy of personal data seriously and we will only process your personal information as detailed in this notice unless we inform you otherwise. To ensure that the personal information we hold is accurate and up to date, we request that you inform us of any relevant changes to the personal information we hold about you.

Lucid Group is committed to complying fully with the UK General Data Protection Regulation and the Data Protection Act 2018. We respect the privacy rights of our employee (past and present) and apply appropriate safeguards to protect their personal data.

* Lucid Group Communications Limited consists of the following companies:

- Lucid Partners Limited
- Vivid Medcomms Limited
- Leading Edge Medical Communications Limited
- Lighthouse Medical Communications US LLC
- Blue Dog Design Limited
- Healthcare 21 Communication Limited

Changes to this privacy notice

Lucid Group may change this Privacy Notice from time to time in order to reflect changes in the law and / or Lucid Group's structure and privacy practices. You are encouraged to check this Privacy Notice for changes whenever you visit the website www.wearelucidgroup.com.

How to contact Lucid Group

The Lucid Group Data Protection Officer can be contacted at Doris.Cheng@wearelucidgroup.com or at Lucid Group Communications Ltd, First Floor, Jubilee House, Third Avenue, Globe Park, Marlow, Buckinghamshire, SL7 1YW, UK.

Types of personal data collected

Personal data are defined as information from which an individual may be identified. The nature of the personal data collected about you will depend on the nature of your interaction with Lucid Group and may include the following:

- Your contact details, such as title, name, postal address, email address, mobile and / or landline telephone number
- Your date of birth, age, gender
- Your nationality
- Your bank account details
- Details of beneficiaries, such as next of kin
- A record of communications with you, such as telephone calls, WebExes and emails
- Your participation in, or provision of services related to, programmes we have executed either as Lucid Group or on behalf of its third-party clients
- Remuneration, including honoraria / fees for service and expenses payment in relation to your participation in, and contribution to, programmes and services
- Information obtained from yourself or third parties, including personal information and information about your academic and medical background, and clinical practice
- Insights about you gained from analysis or clinical practice profiling.

Sources of your personal information

Most of the personal information Lucid Group processes is provided directly by you, and by your administrative support staff.

Lucid Group may also obtain these data from its third-party clients on whose behalf it is performing services, and from public sources, such as journals, hospital department websites and other public websites.

Uses of your personal data

Lucid Group and its partners, agents and suppliers use your personal data, including any of the personal information listed under 'Types of personal data we collect', for the following purposes, which include, but are not limited to:

- Enabling you to take part in medical communication programmes executed either as Lucid Group or on behalf of its third-party clients
- Booking travel and providing other logistical support on your behalf when participating in, or providing services related to, medical communication programmes
- Understanding how best to engage with you in the development, execution and follow up of medical communication programmes
- Performance of market research and analysis either as Lucid Group or on behalf of its third-party clients
- Monitoring and keeping records of communications between you and Lucid Group staff
- Provision of insight and analysis of medical experts both for Lucid Group and for the benefit of its third-party clients whom it supports to deliver medical communication programmes
- Sharing of information, as needed, with business partners such as third-party clients and travel agents
- Contacting next of kin in the event of an emergency
- Compliance to requirements stated in contracts between Lucid Group and / or Lucid Group companies and its third-party clients
- Exercising or fulfilling the legal rights and responsibilities of Lucid Group
- Adherence to rules, guidance and best-practice guidelines issued by governmental and regulatory bodies
- Compliance with legal and regulatory obligations, requirements, and guidance
- Supplier credit checks
- Determining your tax status for the purposes of tax legislation.

Legal bases for processing your personal information

Lucid Group is by law to ensure it have valid grounds for processing your data. The legal grounds that are most relevant to its use of your personal information are:

- Legitimate interests
- Contract
- Consent

Lucid Group may also be required to use your personal data to comply with its legal obligations.

Legitimate interests

This legal ground for processing includes, but is not limited to:

- Working with you to deliver medical communication programmes on behalf of third-party clients and the clients require Lucid Group to maintain records relating to your participation
- Following the guidance and recommended best practice of government and regulatory bodies, including the reporting of honoraria, expenses and other benefits received on behalf of third-party clients,
- Clinical practice profiling, market research and analysis
- Management and audit of Lucid Group business operations
- Monitoring and keeping records of communications with you and Lucid Group staff
- To administer Lucid Group's good governance requirements, such as internal reporting and compliance requirements
- To comply with Lucid Group's legal obligations.

Contract

This legal ground for processing applies where the information is needed to work with you to deliver medical communication programmes, and a Services or other agreement has been executed between you and Lucid Group.

Consent

This legal ground for processing applies to, but is not limited to:

- Some of the research and clinical practice profiling that Lucid Group performs for its own purposes or on behalf of its third-party clients
- Your submission of personal data when registering on websites hosted by Lucid Group or its suppliers.

Withdrawal of your consent

Under circumstances in which Lucid Group rely on your consent to process your personal data, you have the right to withdraw this at any time by contacting Lucid Group using the details provided in 'How to contact Lucid Group'.

Sharing your personal data

Lucid Group may share information with the following third parties for the purposes listed above:

- Companies in the Lucid Group
- Third-party clients of Lucid Group
- Suppliers and agents, such as travel agents
- Agents and companies involved in staffing and recruitment
- Market research organisations who help to develop and improve Lucid Group services
- Regulatory organisations specific to the healthcare industry including, but not limited to, the Association of the British Pharmaceutical Industry (ABPI), the European Federation of Pharmaceutical Industries and Associations (EFPIA) and its other member organisations
- Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing services or operating the business

- Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme
- Other organisations and businesses that provide services to Lucid Group, such as back-up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back-office functions

Data storage and transfer of your personal data

Lucid Group is based in the UK. Data are stored in the UK and the USA and may be transferred to other countries outside the UK. When your data are transferred, Lucid Group will ensure that appropriate data protection safeguards are in place unless an exceptional circumstance arises. If you require more information about these safeguards, please contact the Lucid Data Protection Officer.

Retention of your personal data

Lucid Group will not retain your personal information for longer than necessary and will delete it once it is no longer required for the purposes set out in this Notice. Whilst different periods apply for different types of data, the longest any individual's personal data will normally be held for is for 7 years after completion of the last programme in which the individual participated, as required by third-party clients.

Your data protection rights

Presuming that these rights are not overridden by Lucid Group's legal obligations, or where its legitimate interests are not overridden by your rights and interests as an individual, the following data protection rights apply to the personal data that Lucid Group stores:

- **Right to be informed:** you have the right to be told how your personal information is / will be used. This Privacy Notice is intended to be a clear and transparent description of how your personal data may be used
- **Right of access:** you can request a copy of the information held relating to you. Lucid Group will normally comply with your request within 30 days once satisfied you have rights to view the requested records
- **Right of erasure (right to be forgotten):** you have the right to have your personally identifiable data deleted
- **Right of rectification:** if you believe the records that Lucid Group keep are inaccurate, you have the right to ask for these to be updated.

If you wish to exercise any of the above rights, please contact the Data Protection Officer at Doris.Cheng@wearelucidgroup.com or at Lucid Group Communications Ltd, First Floor, Jubilee House, Third Avenue, Globe Park, Marlow, Buckinghamshire, SL7 1YW, UK.

Complaints

If you are unhappy about the way your personal data has been processed by Lucid Group, you have the right to lodge a complaint with either the Data Protection Officer or directly with the ICO (Information Commissioner's Office in the UK). Further information including contact details are available at <https://ico.org.uk>.