

Issue Date: 02-01-18

Revision No.: 1.00

Delta Medical International Ltd - Data Protection Policy

Introduction

Delta Medical International Ltd (Delta Medical) works with individual persons, hospitals, distribution partners, suppliers and other organisations all of which are considered as 'contacts' of Delta Medical in the context of delivering and sourcing products, providing information, giving support, promotion of products and general business communication.

Delta Medical requires certain information from contacts in order to perform services thoroughly and commits to store contact data securely

This policy exists to outline Delta Medical's measures and internal guidelines for the protection of contact data and to give evidence that Delta Medical complies with the UK Data Protection Act (1998) and the European General Data Protection Regulation (GDPR) (2016/679) to the best of company directors' knowledge.

Policy Scope

This data protection policy applies to Delta Medical International Ltd., its employees and associates.

Staff guidelines

In accordance with the UK Data Protection Act, everyone responsible for using data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

As a general principle Delta Medical will not store data relating the following:

- ethnic background
- political opinions
- religious beliefs
- health
- sexual health
- criminal records

Data Storage

Delta Medical aims to run a paperless operation wherever possible. Contact information is not printed unless a paper version is required and in such cases the paper copy should be stored securely and shredded as soon as it is no longer required.

All contact data is primarily stored digitally on a cloud-based management software 'Podio' (Citrix Systems Inc). Key factors considered when choosing Podio to host the data were the reputable nature of the product, excellent and responsive Podio customer service, accessibility for authorised company employees across different locations and the high level of security offered. Taken from the Podio website (www.podio.com), the following are some key elements about security at Podio:

- Customer-uploaded data is hosted at our Citrix Datacenters in Frankfurt and Amsterdam, and through Amazon Web Services in Dublin.
- HTTPS Encryption on all data between the Podio service and the contact web browser. Login without encryption is non-optional. Podio servers are firewalled and only those services which are required to be running are listening. Connections between servers are made using encrypted secure tunnels
- Podio employees do not access customer uploaded data in Podio without prior customer consent.
- No super-user account exists in the organization. All accounts are private to each individual user
- All data is backed up nightly and copied to another off-site location
- Access all your uploaded data programmatically via the Podio API: <https://developers.podio.com/>
- Multiple contact libraries available
- Import/export data or connect external services to Podio via the API
- Regular security audits are carried out by internal Citrix security team

Podio's Security Whitepaper is also available for further information: https://help.podio.com/hc/en-us/article_attachments/200256358/Podio_security_white_paper.pdf.

Contacts' written correspondence by email is stored on computers owned by Delta Medical. Copies of contact correspondence and backups of all contact data are made regularly and saved on Laptop PCs, Desktop PCs and portable hard drives which are password protected and securely stored at Delta Medical's premises, where normal security measures are taken and revised annually.

Data stored and purpose

Delta Medical generally stores only contact details required to maintain accurate and efficient communication and to ensure information is only sent to appropriate persons. Data stored is typically confined to the following:

- Name
- Organisation
- Department
- Job function
- E-mail address
- Telephone number(s)
- Notes relating to specific products or clinical applications of interest

Contact right to access information

Delta Medical publishes information for contacts regarding their right to access their data which is stored by Delta Medical. This information also informs contacts of their right to request a copy of this policy and/or that Delta Medical ceases to store their information.