



Privacy Notice

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Privacy Notice

This policy was last updated on December 4th, 2023.

Our commitment to your privacy

Adelphi Group of Companies is committed to protecting and respecting your privacy. We take our responsibilities regarding the security of information that we have collected seriously. This privacy policy sets out how we use and protect the information that you provide to us. Please read this policy carefully. If you have any questions, please contact compliance.team@adelphigroup.com

Adelphi Group of Companies – who are we?

This privacy notice applies to the Adelphi Group of Companies. Adelphi Group is part of Omnicom Health Group, a division of Omnicom Group Inc. Find out more about the [Adelphi Group of Companies](#)

In this policy **ADELPHI**, **we**, and **us** means the Adelphi Group of Companies.

About this Privacy Notice

This Privacy Notice applies to **ADELPHI** who are processing personal data under the EU General Data Protection Regulation (EU GDPR) and the UK General Data Protection Regulation, UK Data Protection Act 2018 (UK GDPR).

If you are a Californian resident and would like specific information about our privacy practices and your privacy rights, or to exercise these rights, under the California Privacy Rights Act (CPRA), please see our [California Consumer Privacy Statement](#)

This Privacy Notice provides information on:

- how we use your personal data;
- types of personal data we collect;
- sources of your personal data;
- legal grounds for processing your personal data;
- sharing your personal data;
- retention of personal data;
- how we use Cookies and other tracking technology;
- our policy on correcting and updating personal data;
- making a complaint about our handling of your personal data.

This Privacy Notice also includes specific information for exercising your rights under data protection legislation (EU GDPR and UK GDPR).

How we use your information?

People who have contacted us with a request for information

If you have requested information from **ADELPHI**, we will collect and process the personal data that you provide in order to respond to your request. We will not use it for any other purpose without your explicit consent/permission.

We may collect some or all of the following personal data which will vary according to your relationship with us:

- Name;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Details of the request and correspondence between you and **ADELPHI**.

We will process your personal data where there is a legitimate interest in us doing so if it is reasonably necessary to achieve our or others' legitimate interests. For example, if you are requesting information about a company or a service from **ADELPHI** (see [Adelphi Group of Companies](#)) then we may pass your personal data onto another member of the group to enable them to appropriately respond to your request. Again, unless you consent to the contrary, that member shall only use your personal data to provide the information you have requested.

If you apply to work with us

Our Recruitment Privacy Notice explains how and why we use your personal data, including how long we keep it and who we share it with. Please see our [Recruitment Privacy Notice](#).

If you are employed by us

Our Workplace Privacy Notice explains how and why we use your personal data, including how long we keep it and who we share it with. You will be given the Workplace Privacy Notice if you are offered employment by us and it also available on the **ADELPHI** intranet and from HR.

Commercial communications

We obtain information directly from you, via normal business channels such as email, telephone, video conferencing etc. and in person, for example at conferences and events. Personal data is required to allow **ADELPHI** to provide our services to our existing and potential clients.

We will not share your personal data with any third parties save with your permission or as required by law, for example, to obtain legal advice.

If you have contacted us, then we shall rely on our legitimate interests to record your information.

If we wish to record any sensitive information about you, for example, about your dietary or accessibility requirements, then we will ensure we have a legal reason to do so or ask for your explicit consent.

If we are in negotiation with you for goods or services then we shall rely upon contractual obligations to process the information, as we will either have a contract in place, or be in negotiations to enter into one.

Business contacts, marketing & administration

If you are a business contact, we will ask you if you would like to receive regular communications from us, and we shall do this in accordance with any guidelines concerning the data protection or ePrivacy (electronic marketing) regulations. You can change your preferences at any time, and if you ask us to stop communicating with you, we shall action this request immediately.

ADELPHI needs to manage the business for example, processing invoices, entering into contracts and to do that we rely on our legitimate interests, legal obligations, and fulfilment of our contractual obligations.

We may use your personal data to obtain legal advice or if it is necessary to defend a legal claim or pursue a bad debt, and we may have to pass your information to public authorities and organisations where the law requires us to do so.

To ensure that emails and IT networks have not been compromised we will monitor network and web traffic and may process personal data as a result of this monitoring.

Email Marketing

ADELPHI stay in touch with our clients and prospects using email and to do this we use an email broadcast company. Emails will either be fully opted-in by the subscriber, or we shall be relying on the soft-opt-in rule within the ePrivacy legislation. Within our emails we utilise web beacon technology, sometimes called pixels, which allows us to see whether the email was delivered, which links were clicked and so on. This is to help us offer a better, more relevant service and user experience. The only information collected will be IP address, date/time, general location, and device details.

We never share this information or any of your details with third parties.

People who participate in our market research, health outcomes or observational research projects

How we use your personal data

ADELPHI and its suppliers use your personal data for conducting market research, health outcomes or observational research projects ('research') either as **ADELPHI** or on behalf of our clients. Depending on the type of research project **ADELPHI** or the commissioning client may be the Controller (i.e., the legal entity who determines the purposes and means of the processing of personal data). We will let you know before the start of the project which party is the Controller.

We use your personal data for the following purposes:

- Performance of research and analysis either as **ADELPHI** or on behalf of our clients;
- Monitoring and keeping records of communications between you and **ADELPHI** staff;
- Compliance with our contracts with our clients;
- Sharing of information, as needed, with translators, analysts, data processing companies, fieldwork partners;
- Adherence and compliance with legal and regulatory obligations, requirements, and guidance.

Types of personal data we collect

The nature of the personal data collected about you will depend on your relationship with **ADELPHI** and the type of work we conduct. **ADELPHI** typically uses a network of fieldwork partners and clinical sites to recruit participants to participate in a research project and conduct interviews. ('fieldwork partner'). Please read the fieldwork partner's Privacy Notice for further information about the data that they collect and what it is used for. Typically, the fieldwork partner assigns a respondent identifier (unique reference number) to minimise the personal data seen or shared with **ADELPHI**.

Types of personal data that may be collected include:

- Respondent identifier assigned by the fieldwork partner;
- Information submitted by you during a research interview or when completing a paper or internet questionnaire. This may include information on age, gender, nationality, ethnicity, sexual orientation, health data: including, for example, disease specific experience or drug purchasing/prescribing history, Adverse Events, criminal activity;
- System access information, such as usernames, passwords, and other personally identifiable information;
- Your bank account details;
- Remuneration, including honoraria/fees for service and expenses payment in relation to your participation in, and contribution to, programmes and services;
- Relevant activities associated with the work we undertake, on social media and other publicly available digital channels, used as part of services and business activities we undertake for or that which is necessary as part of our wider business engagement;
- Your contact details, such as title, name, email address, mobile/telephone number, and company information such as job title/role, office location, mobile/telephone number;
- Your qualifications and type of hospital where you work.

We may with your consent, also retain the following:

- Your date of birth, age, gender;
- Your nationality;
- Details of nominated contacts, such as next of kin.

Sources of your personal information

Most of the personal information **ADELPHI** processes is provided directly by you, or by the fieldwork partner. Sometimes the sponsoring client may provide a list of names for the purposes of contacting potential respondents. **ADELPHI** will follow the client's instruction on processing the personal data but will ensure that the personal data is processed according to data protection legislation including assurance that the list of names can be legitimately used for the intended research purpose.

Legal grounds for processing your personal data

Under data protection legislation, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. Typically, for research **ADELPHI** relies on Legitimate Interests and Explicit Consent. **ADELPHI** may also be required to use your personal data to comply with a legal obligation or to protect the vital interests of the participant.

Consent

To process your personal data, we obtain your explicit consent. This means that before we collect any information from you, we ensure that you are provided with full details about the purpose and nature of the research and what will happen to the information we collect.

Withdrawal of your consent

If we have relied on consent as a ground for processing, you may withdraw your consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdrew consent. See section Your data protection rights on page 12.

Legitimate interests

In certain cases, we are able to rely upon our legitimate interests to process your non-sensitive data. Examples of personal data that maybe processed using legitimate interests include:

- Maintaining records relating to your participation in research projects;
- Adhering to regulatory bodies guidance and compliance requirements;
- Audit requirements;
- Monitoring and keeping records of communications between you, the fieldwork partner and **ADELPHI** staff.

Sharing your personal data

In some cases, we may need to share personal information with third parties that provide research services in support of the research project e.g., translators, analysts, data processing companies, fieldwork agencies. Any third party that receives personal information is obligated to follow all the same privacy protection regulations as followed by **ADELPHI**.

Retention of personal data

ADELPHI will not retain your personal data for longer than is necessary. At the end of the research project **ADELPHI** redact (remove) any personal data no longer required for the project.

For personal data we need to retain, the period of retention is determined by several criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations.

Typically, to comply with our legal and regulatory obligations we will retain your personal data for up to 10 years. For research projects that are part of clinical trials, the data will be retained for up to 25 years to meet regulatory requirements.

People who engage in our medical communications, medical education, and publication programmes

How we use your personal data

ADELPHI and its suppliers use your personal data for running medical communications, medical education, and publication programmes ('programmes') either as **ADELPHI** or on behalf of our clients. Normally the commissioning client is the Controller (i.e., the legal entity who determines the purposes and means of the processing of personal data). Typically, you will sign a contract with the client which will explain the details of the project and what will happen to your personal data.

We use your personal data for the following purposes:

- Booking travel and providing other logistical support on your behalf when participating in, or providing services related to programmes;
- Monitoring and keeping records of communications between you and **ADELPHI** staff;
- Evaluation of medical experts both for **ADELPHI** and our clients whom we support to deliver communication programmes;
- Sharing of information, as needed, with our clients and suppliers;
- Contacting your nominated contact in event of an emergency;
- Compliance with our contracts with our clients.
- Adherence to legal and regulatory obligations, requirements, and guidance.

Types of personal data we collect

The nature of the personal data collected about you will depend on your relationship with **ADELPHI** and the type of work we conduct, but may include the following:

- Your contact details, such as title, name, email address, mobile/telephone number, and company information such as job title/role, office location, mobile/telephone number;
- Records of communications with you and other parties e.g., telephone calls, on-line meetings, emails, chat, or text messages;
- Information supplied by you, your colleagues, our client or third parties, such as academic, career history, medical background, clinical practice, field of research, practice, and other professional specialism information;
- Your participation in, or provision of services related to programmes that may be required to be put on public record;
- Remuneration, including honoraria/fees for service and expenses payment in relation to your participation in, and contribution to, programmes and services;
- Relevant activities associated with the work we undertake, on social media and other publicly available digital channels, used as part of services and business activities we undertake for or that which is necessary as part of our wider business engagement;
- System access information, such as usernames, passwords and other personally identifiable information that would allow **ADELPHI** to access IT systems and/or operate on your behalf when nominated to do so by you.

We may with your consent, also retain the following:

- Your date of birth, age, gender;
- Your nationality;
- Your bank account details;
- Details of nominated contacts, such as next of kin;

Sources of your personal information

Most of the personal information **ADELPHI** processes is provided directly by you and by your administrative support staff. For example, you tell us your contact details and banking details. We may also obtain your personal data from our clients where we are running a programme or service on their behalf. In some instances, information may be sourced from the public domain, but we will ensure this is processed lawfully and will inform you or seek consent for certain processing activities.

Legal grounds for processing your personal data

Under data protection legislation, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. Typically, for our programmes we rely on Contract, Legitimate Interests and Consent. **ADELPHI** may also be required to use your personal data to comply with a legal obligation.

Legitimate interests

In certain cases, we are able to rely upon our legitimate interests to process your non-sensitive data. Examples of personal data that maybe processed using legitimate interests include:

- Maintaining records relating to your participation in programmes;
- Adhering to regulatory bodies guidance and compliance requirements;
- Audit requirements;
- Tracking and record-keeping of communications between you and **ADELPHI** staff.

Contract

Example of personal data that maybe processed using the performance of a contract:

- The processing is necessary for the execution of a contract in which you are a party. The contract maybe with you and **ADELPHI** or you and our client.

Consent

Example of personal data that maybe processed where you have given specific consent to the processing of your data.

- Retaining your contact details and company information for potential future projects.

Withdrawal of your consent

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdrew consent. See section Your data protection rights on page 12.

Sharing your personal data

ADELPHI may share information with the following third parties when running programmes:

- Suppliers and agents, such as travel agents;
- Regulatory organisations;

How long do we keep your personal data for?

ADELPHI will not retain your personal information for longer than is necessary. The period for which we keep your personal data will be determined by several criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations.

Typically, to comply with our legal and regulatory obligations we will retain your personal data for up to 10 years. Any such personal data that regulatory or legal requirements do not mandate to retain, is deleted once the purpose has been filled. For research projects that are part of clinical trials, the data will be retained for up to 25 years to meet regulatory requirements.

If you use our website

When you visit one of the **ADELPHI** websites, we automatically use some cookies that are strictly necessary to provide our services to you and allow the website to operate; for all other cookies we need your consent. This is why when you first logged onto our website you were asked for your permission to append these non-essential cookies such as Google Analytics/Click Dimensions.

For further information on the use of our Cookies and our reason for using Cookies, please see our Adelphi Group Cookie Notice available on our websites.

Children's Personal Data

We recognise the importance of protecting privacy where children are involved. We do not knowingly collect personal data online from children under the age of 13.

We may process children's personal data as part of our market research, health outcomes or observational research projects. However, and as required by applicable law, we do so with the appropriate parental or guardian consent. For more details you can contact us on the details included on page 10.

For how long do we keep your personal data?

We are required by law to keep your personal data only for as long as is necessary for the purpose(s) it was given. The period for which we keep your personal data will be determined by several criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations. Specific Retention periods are outlined in our Data Retention and Deletion Procedure.

We keep a backup of our data to restore the original data after a data loss event. When we delete your personal data, it will be deleted from the live storage immediately but there will be a delay before it is removed from the backup data.

The following table provides a guide of how long we typically retain your information.

Data type	Reason	Retention period
Financial Records	Tax records, payroll etc – for legal purposes	7 years
Employee/HR/Health and Safety records	Employee files – for legal purposes	For duration of employment and for up to 7 years after employment ceases. Some medical test data may be retained indefinitely when legally required.
Recruitment information	CV's and applications for unsuccessful candidates will be deleted – legal obligations	Unsuccessful candidates – deleted after 12 months. Extended with consent of candidate. Successful candidates – CV kept on record.
Contracts and agreements	Contracts and agreement with Clients and suppliers – contractual and legal obligations	10 years after expiry.
Emails	Monitoring of communications between sender and receiver – legitimate interests.	After 90 days.
Project records	Regulatory requirements or contractual obligations of the Controller (commissioning client).	Up to 10 years
Research projects part of a clinical trial	Regulatory requirements or contractual obligations of the Controller (commissioning client).	Up to 25 years (dependant on Client requirements outlined in MSA's)

Who do we share your information with?

We use selected agents to process your information on our behalf, such as software providers to host our website. Such third parties will be authorised to process and use your information but only to fulfil their contractual obligations to us and will not be permitted to use it for any other purpose. We retain full responsibility for how your personal information may be used by such agents.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom or European Economic Area ("EEA"). It may also be processed by staff of **ADELPHI** who are operating outside the UK/EEA. By submitting your personal data, you understand this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

We may share your personal data with other parties so that we can comply with a legal obligation to which we are subject. For example: where we are obliged to share your personal information with regulatory bodies which govern our work and services; government departments such as law enforcement and HMRC; court orders etc. We may also share with our legal, professional, and financial advisors.

We will process your personal information where there is a legitimate interest in us doing so if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). For example, if you are requesting information about a company or a service from a member of **ADELPHI** (see [Adelphi Group of Companies](#)), then we may pass your personal data onto another member of the group to enable them to appropriately respond to your request. Again, unless you explicitly consent to the contrary, that member shall only use your personal data to provide the information you have requested.

We may share your data when conducting research and running programmes, if you apply to work with us and if you are employed by us. See the relevant sections in this Privacy Notice.

ADELPHI does not sell, trade, or rent your personal information.

Transfers of personal data outside the UK and EEA

In connection with our business and for employment, administrative, management and legal purposes, we may transfer your personal data outside the UK and EEA to members of our group and processors in the United States and on occasion other jurisdictions in which we are established. We will ensure that the transfer is lawful and that there are appropriate security arrangements in place both during transmission and whilst at rest.

Where we need to transfer your information outside of the United Kingdom or European Economic Area, we only do so to countries which have been determined by the UK Government or European Commission to have an adequate level of data protection or by using a variety of legal mechanisms, such as data sharing or processing agreements including International Data Transfer Agreements (IDTA) issued by the UK Information Commissioners Office, or Standard Contractual Clauses (SCC) approved by the European commission.

Personal data collected under the Data Privacy Framework

On 10th July 2023, the European Commission adopted its adequacy decision for the EU-U.S. Data Privacy Framework program (DPF). The adequacy decision concludes that the United States ensures an adequate level of protection for personal data transferred from the EU to US companies participating in the Data Privacy Framework.

On the 21st of September, the U.K. Parliament approved secondary regulations to extend the framework to the UK. The UK – EU – U.S. extension of the Data Privacy framework has now taken effect.

ADELPHI has adopted a separate Data Privacy Framework Policy describing our compliance with the program, individual rights and redress information. Go to our [Data Privacy Framework Policy](#) to find out more.

Our commitments to Data Privacy Framework (DPF) are enforceable by the US Federal Trade Commission, and any personal data collected by **ADELPHI** under DPF, complies with the principles set out in the DPF. To learn more about the Data Privacy Framework program, and to view our certification, please visit

<https://www.dataprivacyframework.gov/s/>.

How we protect your information?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered, or disclosed in any unauthorised way. 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. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

To protect your personal data **ADELPHI** employ:

- Technical measures, including but not limited to, robust network security, firewalls, anti-virus protection, regular internal and external oversight, and inspection, including penetration testing, access controls, audit trails, encryption of devices and data both whilst at rest and during any transmission to and from third parties in order to keep your personal data secure.
- Organisational measures including, but not limited to, training of all individuals who process personal data in data protection and information governance, the creation of and adherence to appropriate policies and procedures.
- Techniques such as **anonymisation** (individuals are not identifiable and cannot be re-identified by any means) or **pseudonymisation** (individuals are not identifiable from the data itself but can be identified by referring to other information held separately) of personal data
- Privacy by Design principles including data protection impact assessments which clearly document the privacy risks and the measures taken to mitigate those risks.
- Archiving measures so data that is no longer actively used is moved to a separate storage location, with additional access controls, for long-term retention.

Confidentiality and Security of Personal Data

We are committed to keeping the personal data you provide to us secure, and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e., those who process your personal data

on our behalf) are obliged to respect the confidentiality and integrity of the personal data of the individuals whose data we collect and users of our website.

Your data protection rights

You have specific rights in connection to your personal data processed by **ADELPHI**, although in some cases these rights are subject to certain conditions and limitations. To exercise any of these rights please contact us using the contact details in the Contact details section on page 15.

Right to be informed

You have the right to be told how your personal information is/will be used. This Privacy Notice and our Recruitment and Workplace Privacy notices are intended to provide a clear and transparent description of how your personal data may be used. You also have a right to be informed if a breach of your personal data has taken place which will result in a high risk to your fundamental rights and freedoms.

Right of access to your information

You can request a copy of the information held relating to you. Please ensure that you include your name and clear instructions on what you would like us to do. You may make this request via any channel, but we will need to verify your identity before any information can be released. If you require us to supply you with details of the personal data that we hold about you, then we will provide this information free of charge and we will provide this information to you within one month of your request unless the request is complex or is numerous requests. If this is the case, we will inform you within one month of your request about the reason for the extension of time.

Right of erasure (right to be forgotten)

You have the right to have your personal data deleted but only where there is no lawful reason for it to be retained by **ADELPHI**.

Right of rectification

If you believe the records that **ADELPHI** keep are inaccurate or incomplete, you have the right to ask for these to be enhanced and updated.

Right to object

You have the right to object to the processing of your personal data based on consent, our legitimate interests, or the performance of a task in the public interest or exercise of official authority including profiling activity, direct marketing; and processing for purposes of scientific and or historical research and statistics

Right to data portability

You have the right to data portability which allows individuals to obtain and or reuse their personal data uploaded by themselves and which is held in a digital format to be transferred to a specified alternative Controller.

Right to be aware of automated decision-making

You have right to be made aware of any automated decision-making, that is made without any human involvement, and/or profiling of your personal information by **ADELPHI**.

Right to 'block' or suppress

You have the right to 'block' or suppress the processing of your personal data.

Processing of your personal data may be restricted in the event it is no longer essential to support the use of services provided to you and is no longer needed for any contractual, legal, or financial reasons. In those cases, **ADELPHI** is permitted to store the personal data, but not further process it.

ADELPHI may retain just enough information about you to ensure that any do not contact, or restriction of processing is respected in the future.

Opt-out of marketing communications

You have the right to opt-out of any unsolicited marketing communications which we may send you from time to time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. You can also opt-out of other forms of marketing (such as postal marketing or telemarketing), by contacting us.

Withdraw your consent

If we have collected and processed your personal information with your consent, then you can withdraw your permission at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

California Privacy Rights Act

If the California Privacy Rights Act (CPRA), applies to the processing of your information you have specific privacy rights. Our California Consumer Privacy Statement explains our privacy practices and your privacy rights. Please see our [California Consumer Privacy Statement](#).

Complaints

If you have complaints relating to our processing of your personal data, you should raise these with the **ADELPHI** compliance department; see section Contact details on page15 or you can raise directly with the relevant supervisory authority.

In the UK: Information Commissioner's Office (ICO). They can be contacted via their website <https://ico.org.uk/>

In the Netherlands: Autoriteit Persoonsgegevens. They can be contacted via their website <https://autoriteitpersoonsgegevens.nl>

Contact details

Adelphi Data Protection Officer

The Adelphi Data Protection Officer (DPO) is registered with the UK Information Commissioner's Office and can be contacted via the Adelphi Group (UK office) contact details.

Adelphi Group (UK office), ATTN: DPO/Compliance Department

Adelphi Mill, Bollington

Cheshire SK10 5JB, UK

Email: compliance.team@adelphigroup.com

Phone: +441625 577 829

Adelphi Group (Netherlands office), ATTN: DPO/Compliance Department

Professor W.H. Keesomlaan 4,

1183 DJ Amstelveen, The Netherlands

Email: compliance.team@adelphigroup.com

Adelphi Group (US office), ATTN: DPO/Compliance Department

2005 South Easton Road, Suite 300, Doylestown, PA 18901

Email: compliance.team@adelphigroup.com

Data protection representative based in the European Economic Area

If the Adelphi company is based outside the European Economic Area (EEA), and you are an individual in the EEA you can contact our European data protection representative at:

Adelphi Group (Netherlands office), ATTN: European Data Protection Representative,

Professor W.H. Keesomlaan 4,

1183 DJ Amstelveen, The Netherlands

Email: compliance.team@adelphigroup.com

Changes to this Privacy Notice

We keep our Privacy Notice under regular review and reserve the right to revise it at any time. There is a date at the beginning of this policy which indicates the date it was updated. Please revisit this policy each time you consider giving personal information.