

---

## PRIVACY NOTICE

---

### BACKGROUND:

I understand that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of all of my clients and business contacts and will only collect and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law.

#### 1. Information About Me

Christopher Barnett, trading as CMBarnett Pharma Services

Sole trader (Autonomo), registered under Spanish Law as an intracommunity trader with tax identification ESY6725142W.

Postal Address: Calle Nuestra Señora del Carmen, 17, Estación de Salinas, Archidona, MALAGA, 29315 Spain

#### 2. What Does This Notice Cover?

This Privacy Information explains how I use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and Spanish Data Protection laws (collectively, “the Data Protection Legislation”) 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.

The personal data that I use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which I will always work to uphold:

- a) The right to be informed about my collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data I hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose

of any of your personal data that I hold. Please contact me using the details in Part 11 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to me using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if I am relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to me directly, I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. I do not use your personal data in this way.

For more information about my use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data I hold about you changes, please keep me informed as long as I have that data.

Further information about your rights can also be obtained from the Data Protection Authority in your country.

If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Consejo de Transparencia y Protección de Datos de Andalucía. I would welcome the opportunity to resolve your concerns myself, however, so please contact me first, using the details in Part 11.

## 5. What Personal Data Do You Collect and How?

Depending upon your use of my services, I may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. I do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

I do not collect personal data via my website.

Data Collected	How I Collect the Data
Identity Information including Name, job title or position, employer, profession	Data provided by you when we do business or make contact using LinkedIn or similar sites
Contact information including business address, email, telephone numbers	Data provided by you when we do business or make contact using LinkedIn or similar sites
Data from third parties including name, profession. Job title, email address	Conference/symposium attendance lists

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, I must always have a lawful basis for using personal data. The following table describes how I may use your personal data, and my lawful bases for doing so:

What [We] OR [I] Do	What Data I Use	My Lawful Basis
Administering my business.	Identity information including name, job title or position, employer, profession. Contact information including business address, email, telephone numbers.	To communicate with you in the exercise of my profession or to provide my services to you or your employer
Supplying my services to you or our employer	Identity information including name, job title or position, employer, profession. Contact information including business address, email, telephone numbers..	To communicate with you in the exercise of my profession or to provide my services to you or your employer
Managing payments for services	Identity information including name, job title or position, employer, profession. Contact information including business address, email, telephone numbers..	Accountancy, billing and credit control relating to my business
Communicating with you	Identity information including name, job title or position, employer, profession. Contact information including business address, email, telephone numbers..	To advise you of continuing or new services that I am offering. To request advice or assistance from you

With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email or post with information, news, and offers on my services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with my obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. I do not share your personal data with third parties for marketing purposes.

I do not use automated data processing systems.

I do not collect personal data via my website.

I will only use your personal data for the purpose(s) for which it was originally collected unless I reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If I do use your personal data in this way and you wish me to explain how the new purpose is compatible with the original, please contact me using the details in Part 11.

In some circumstances, where permitted or required by law, I may process your personal data without your knowledge or consent. This will only be done within the

bounds of the Data Protection Legislation and your legal rights.

**7. How Long Will You Keep My Personal Data?**

I will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long [We] OR [I] Keep It
Identity Information including Name, job title or position, employer, profession	Ten Years
Contact information including business address, email, telephone numbers	Ten Years.
Data from third parties including name, profession. Job title, email address	Ten Years

**8. How and Where Do You Store or Transfer My Personal Data?**

I may hold some of our personal information on data drives or portable computers. Where this is the case, access to these data is controlled using biometric and/or password protection and encryption to minimise the risk of unlawful disclosure.

I use cloud-based data storage and archiving solutions (Microsoft 365, Dropbox), and these services may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the EEA. This means that I will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the EEA and under the Data Protection Legislation as follows:

I will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#).

**Data stored on these cloud-based solutions is encrypted both “at rest” and during transfers between data centres.**

Please contact me using the details below in Part 11 for further information about the particular data protection mechanisms used by me when transferring your personal data to a third country.

The security of your personal data is essential to me, and to protect your data, I take a number of important measures, including the following:

- limiting access to your personal data to those agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality
- Maintenance of biometric and password protection and encryption on portable data storage devices including laptop computers
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your

personal data) including notifying you and/or the Consejo de Transparencia y Protección de Datos where I am legally required to do so

**9. Do You Share My Personal Data?**

I will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

Elements of your personal data (name, position, contact information) may be included in emails with clients or reports that I have prepared for clients covering shared business interests or purposes.

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

**10. How Can I Access My Personal Data?**

If you want to know what personal data I have about you, you can ask me 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 11.

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 my administrative costs in responding.

I will respond to your subject access request within one month of receiving it. Normally, I 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 I receive your request. You will be kept fully informed of my progress.

**11. How Do I Contact You?**

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

Email address: [info@cmbarnettpharma.com](mailto:info@cmbarnettpharma.com).

Telephone number: +34 663533028.

Postal Address: Calle Nuestra Señora del Carmen, 17, Estación de Salinas, Archidona, MALAGA, 29315 Spain

**12. Changes to this Privacy Notice**

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects personal data protection.

Any changes will be made available via my website or my email signature. This Privacy Notice was last updated on 11 August 2020.