

Website Privacy Policy

Thornton and Ross is based in Huddersfield, West Yorkshire. We develop, manufacture and supply a wide and growing range of branded OTC medicines, dermatological preparations, generic medicines and other pharmaceutical, healthcare and hygiene products.

Thornton and Ross puts priority on protecting your personal information. Acknowledging the importance of your personal information, we strive to secure and carefully process the information you share with us. We value your trust. We hence provide notice regarding how we collect, use and share your information. Our collection, use and sharing of your information is only based on your permission or where allowed by law.

By using this website, you are deemed to have agreed with the terms of this Privacy Policy. Whenever you submit information via this site, you therefore consent to the collection, use and disclosure of that information in accordance with this Policy.

Scope of this Privacy Notice

This Privacy Notice applies to personal data we collect through the Site. It describes how we use your data and your data protection rights, including a right to object to some of the processing which we carry out.

Our Site may include links to other websites over which we have no control. Thornton and Ross is not responsible for the privacy policies or practices of other websites.

Personal data we collect

Personal Information is collected at several different points on this website with the informed consent of the visitor. The Information provided is used to improve the appropriateness of the information provided on the website, market research, and the provision of other services by the company, associated companies and other third parties.

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Personal Information You Provide To Us: We or our service providers (acting on our behalf) may collect "Personal Information" (which is information that, on its own or when combined with other information, identifies you or relates to you as an identifiable individual) that you provide to us, such as your first and last name, email, telephone number(s), address or post code and any Usage Personal Information (explained below), such as IP address, to the extent that this allows you to be identified.

Personal Information Collected Automatically: Whenever you visit or interact with the Site, we, as well as our third party service providers, may use a variety of technologies that automatically or passively collect information about how the Site is accessed and used (collectively, "Usage Personal Information"). Usage Personal Information may include:

IP address or other unique identifier ("Device Identifier") for the computer, mobile phone, tablet or other device you use to access the Site ("Device").

- Device type
- Demographics
- Location
- Language
- Type of browser software and operating system you are using
- Page(s) served, the time, and the preceding page views
- Event type (pages viewed/documents downloaded)
- Event date/time
- Page URL
- Downloaded item URL

Personal Information Collected when using our social media appearance

We may use the following social media platforms to provide you with information about our company and our products: Facebook, Twitter, Instagram, LinkedIn, TikTok and Pinterest. We may use the so-called two-click solution.

We have no influence on the collected data and data processing processes, nor are the full extent of the collection, the purposes of the processing and the storage periods known to us. We also have no information regarding the deletion of the collected data by the social media provider. The social media provider saves your personal data as user profiles and uses them for the purposes of advertisements, market research and/or the needs-oriented design of its website. Such analysis takes place (even for users that are not logged-in) for presentation of user-oriented advertisements and to inform other users of the social network about your activities on the website. You have the right to object to the generation of such user profiles, the exercise of which you need to contact the respective plug-in provider. Through these plug-ins, we offer you the opportunity to interact with social media and other users, to improve our offers and to make their design more interesting. Legal foundation for the use of the plug-ins is Art. 6 (1) 1 f) GDPR.

Further information on the purpose of the data collection and its processing by the social media provider can be found in the privacy statements of these providers. There you can also get more information about your rights and possibilities to protect your privacy by adjusting the user settings.

Addresses of the respective social media providers and URL to their privacy statements:

a) Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA; www.facebook.com/policy.php; further information on data collection: www.facebook.com/help/186325668085084, www.facebook.com/about/privacy/your-info-on-other sowie www.facebook.com/about/privacy/your-info. Facebook acts under the EU-US-Privacy-Shield, www.privacyshield.gov/EU-US-Framework.

b) Twitter Inc., 1355 Market St, Suite 900o, San Francisco, California 94103, USA; twitter.com/privacy. Twitter acts under the EU-US-Privacy-Shield, www.privacyshield.gov/EU-US-Framework.

c) LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA; www.linkedin.com/legal/privacy-policy. LinkedIn acts under the EU-US-Privacy-Shield, www.privacyshield.gov/EU-US-Framework.

d) TikTok Inc., [10100 Venice Blvd., Culver City, CA 90232](http://10100.Venice.Bldv.,Culver.City,CA.90232), USA; <https://www.tiktok.com/legal/privacy-policy?lang=en>

e) Pinterest Inc., 651 Brannan Street, San Francisco, CA 94103, <https://policy.pinterest.com/de/privacy-policy>. Pinterest acts under the EU-US-Privacy-Shield, www.privacyshield.gov/EU-US-Framework

f) Instagram a corporation of Facebook Inc., 1601 S California Ave, Palo Alto, California 94304; <https://help.instagram.com/519522125107875>. Instagram acts under the EU-US-Privacy-Shield, www.privacyshield.gov/EU-US-Framework

g) Integration of YouTube videos

We may include YouTube-videos in our online offer that are saved at www.YouTube.com and which can be played directly from our website.

By visiting the website, YouTube receives information, that you have visited the respective sub-site of our website. In addition, the data listed in section 3 is transferred. This takes place regardless of whether YouTube offers a user account that you are already logged-in to or if no user account exists. If you are logged-on at Google, your data is directly matched with your account. If you do not wish the matching with your profile at YouTube, you need to log-out before using the button. YouTube saves your data as user profiles and uses them for purposes of advertisements, market research and/or user-oriented design of its website. Such an analysis takes place (even for users that are not logged-in) for displaying user-oriented advertisements and in order to inform other users of the social network about your activities on our website. You have the right to object regarding the generation of such user profiles. For the execution of this right, you need to contact YouTube.

3) Further information on the purpose and scope of the data collection and processing by YouTube can be found in the privacy statement. There you can also find further information on your rights and possibility to change the settings to protect your privacy: www.google.de/intl/en/policies/privacy/. Google processes your personal data also on US territory.

How we use your information

We process the personal data we collect for the following purposes:

With your consent to:

- to provide you with information on Thornton and Ross's business activities, products or services
- to send you email newsletters and notifications
- to place cookies and similar technologies, as described in the Site's cookie policy.
- to track your usage and see which sections of our web sites you visit via Google Analytics

To allow us to pursue our legitimate business interests, in particular to:

- to respond to your queries or other correspondence you have submitted through the site
- to complete and fulfil any requests for products or services
- analyse the use of our site in order to continuously improve content and measure performance
- to tailor content, advertisements, and offers we serve you
- to show you promotions and offers via our social media platforms relevant to your previous activity

To meet legal, regulatory, pharmacovigilance and compliance requirements, in particular to respond to requests for information from government authorities.

Will Thornton and Ross share my personal data with anyone else?

In general, Thornton and Ross Limited shares aggregated information and statistics about its customers, sales, traffic patterns and related website information with partners, third parties, marketing agencies, suppliers and advertisers.

We may pass your personal data on to third-party service providers contracted to Thornton and Ross in the course of dealing with you, as explained in this Privacy Policy, as disclosed at the time you provide your information and in the following circumstances:

- **Third Party Service Providers:** We instruct other companies and individuals to perform functions on our behalf. Examples may include sending e-mail, managing training courses, analysing data, providing marketing assistance, hosting data, for tax and financial advice, for legal advice, accountancy or auditing services, website management and development and providing customer service. In connection with their performance of these functions on our behalf, we may share Personal Information with such companies and individuals as needed for them to perform their functions.
- **Legal Disclosure:** We may transfer and disclose your Personal Information to third parties to comply with a legal obligation; when we believe in good faith that the law or a governmental authority requires it; to verify or enforce our Terms of Use or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect our rights or property or the security of third parties, visitors to our Site, or the public

When they no longer need your data to fulfil this service, they will dispose of the details in line with Thornton and Ross's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

Thornton & Ross may process your data additionally outside the European Union. Thornton & Ross is a globally-active company. In the course of our business activities, we may potentially transfer your personal data also to recipients outside of the European Economic Area ("third countries"), where the applicable laws do not grant the same data protection safeguards as those in your home country. If this is the case, we will maintain the applicable data protection regulations and take appropriate protection measures to safeguard the security and integrity of our personal data, in particular through the conclusion of the EU standard contract clauses, which you can find at the following link: eur-lex.europa.eu/LexUriServ/LexUriServ.do

How long will Thornton & Ross save information about me

Purpose of storage	Storage time
Web server logs	14 days
General inquiries	180 days / 6 months
Order information	180 days / 6 months
Newsletter subscription/unsubscription	As long as you subscribe to the newsletter. If you unsubscribe from the newsletter, you will be deleted directly.

Purpose of storage	Storage time
Use of services and promotions	As long as active consent for long-term use is available. In the event of revocation, the data will be deleted. In the case of one-time use of offers without active consent for permanent use, the data will be deleted after 6 months.
Faculty Login	As long as access is desired. In the event of revocation, the account will be deleted within 14 days.

Under what circumstances will Thornton and Ross contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that Thornton and Ross holds about me?

According to the provisions of the GDPR, you can exercise the following rights towards us:

- Right to access
- Right to rectification
- Right to restriction of processing
- Right to deletion / “right to be forgotten”
- Right to data transferability
- Right of appeal

In order to assert one of your rights listed mentioned above, you can contact us at any time.

If the processing of your personal data is based on your consent, you have the right to object / withdraw your consent at any time, with effect for the future. The legality of the processing based on your consent until the withdrawal of the consent remains unaffected. Given consent can of course be canceled under the following address at any time with effect for the future: data@thorntonross.com

How to contact us about your personal data or this privacy policy

If you have any questions about this privacy policy or about your personal data, please email us at dataprotection@thorntonross.com or write to us at the following address:

GDPR Representative
Thornton and Ross Limited
Manchester Road
Huddersfield
HD7 5QH

Changes to this privacy policy

We aim to meet high standards and so our policies and procedures are constantly under review. From time to time we may change this privacy policy. Accordingly we recommend that you check this page periodically in order to review the latest version.

Where to make a complaint

If you have a complaint regarding any aspect of your personal data or this privacy policy, please write to us at the above address.

If you are still not satisfied with the outcome of your complaint, you may write to the Information Commissioner's Office at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You have also the right to file a complaint at the Information Commissioner's Office using their online form: <https://ico.org.uk/global/contact-us/email/>

The rapid development of the internet will make adjustments to our privacy regulations necessary from time to time. You will be informed on up-dates on this page.