

## **Let's talk about privacy**

At Boots, we believe in making things easy for our customers. We know there's nothing more off putting than the sight of a lot of boring small print, so we've written our Privacy Policy to make it clear, simple and easy to read.

The policy explains how Boots uses your personal data, whether you're shopping on boots.com, having your eyes tested at Boots Opticians or having a prescription made up at your local Boots pharmacy.

[Click here](#) if you are looking for a full list of cookies that we use on this site.

[Click here](#) to amend your cookies settings.

## **Our promise to you**

Boots is committed to protecting your privacy. We believe in using your personal information to make things simpler and better for you. We'll always keep your personal information safe and will never sell it to third parties. We'll be clear and open with you about why we collect your personal information and how we use it. Where you have choices or rights, we'll explain them to you and respect your wishes. We've written this Privacy Policy in plain English to tell you how and why we use your personal information. We hope you'll find it clear and simple but if you have any concerns or questions please feel free to contact our Boots Customer Care.

## **Who's in control of your information?**

You are. Throughout this Privacy Policy, 'we' or 'Boots' means companies within the Walgreens Boots Alliance Group, including subsidiaries, affiliates, joint ventures and franchises. We share your personal information among these companies in order to provide, and keep you informed about our products and services, to handle any complaints or queries, and to give you the best customer service we possibly can. However, we never lose sight of the fact that it is your personal information and we will only send you marketing material if you have agreed that we can do so. You can find out more about the companies in Walgreen Boots Alliance on our website.

## **How we process your personal data**

### **Collecting information about you**

Boots collects personal information about you whenever you shop with us online or instore, and when you use our services. Please see below for examples of the data we collect from you:

boots.com Boots mobile app	Name, address, contact details, purchases, devices information, browsing behaviour, adverts you may click on (including those shown on other organisations' websites)
Boots Advantage Card	Personal data about yourself, purchases, emails and other digital communications we send to you, including information about which emails you open, and what links you might click on.

Pharmacies, Opticians, Hearing care and stores	Personal data about yourself, such as name, address, age, gender, contact details purchases, appointment information, prescription, and audiological data.
Appointment booking	Personal data about yourself, such as name, address, age, gender, contact details and medical information.
Social media	<p>When opted into marketing we obtain information posted publicly on social media sites and use it to help us understand how our different customers interact with us and what people think and feel about our brand. We do this in a way that doesn't always identify individual customers e.g. we may look at which groups of customers are more likely to talk to us via social media or use social media to talk about Boots products.</p> <p>Boots share pseudonymised data with social media platforms such as Facebook to enable Boots to deliver content and messages which may be of interest to you.</p>
Processing data about children	<p>Boots Opticians and Pharmacy process children's data for appointments and processing prescriptions. Children under the age of 16 using these services must be accompanied by an adult at all times.</p> <p>If you're a member of the Parenting Club, Boots will also store and process your child's data, such as their date of birth. In order to obtain a Boots Advantage Card or a boots.com account you must be at least 13 years old.</p>
Information provided by other people on your behalf	<p>If someone books an appointment on your behalf we'll ask them for basic details about you, which may include health details such as whether you have a family history of diabetes or glaucoma. This is to ensure we book you in for the right type and length of appointment. We'll check with you when you come to your appointment to make sure the information we've been given is accurate.</p> <p>If you're booking an appointment or registering for a service for someone else, please make sure they're happy for you to provide their personal information on their behalf and that they understand why the information is needed</p>

## How and why we use your personal information

We use your personal information to provide our products and services. Some are essential for us to provide the services you use or to fulfil our legal obligations. Some help us run our business efficiently and effectively. Some enable us to provide you with more relevant and personalised offers and information for example to set up and run your account, process orders and transactions, respond to queries and comments and provide you with the best possible level of customer service.

We may use it to contact you about orders you've placed or appointments you've booked or to send you reminders (e.g. about repeat prescriptions). We may also contact you in emergency situations, such as an urgent product recall or where we have a duty of care to notify you of information that relates to your health.

In all cases we must have a reason and a legal ground for processing your personal information. Some of the most common legal grounds we rely on are briefly explained below.

	Detail	Examples
Consent	<p>You'll be asked to confirm that you're happy to provide your personal data and that you give permission to Boots to process your personal data. All of the details such as why Boots want your data, how it will be used and if your data will be shared, will be provided at the time of asking you for your consent.</p> <p>Where Boots are relying on consent you will usually see a tick box.</p> <p>You have the right to withdraw your consent at any time if you no longer want to be part of the Boots processing activity</p>	<p>Boots may use consent where we're asking you to confirm your marketing preferences to ensure we only contact you via the medium you have chosen i.e. text or email</p>
Contractual	<p>Processing data for the purposes of a contract to which you are party to.</p> <p>There's a range of legal and regulatory requirements we and our parent company need to comply with, and some of these may affect the way we process personal data, or the length of time for which we are required to keep it.</p>	<p>When you purchase a product in a Boots store, on Boots.com or via the Boots app you are entering into an agreement to purchase the products from Boots.</p> <p>Boots are required to obtain your personal information such as your name and delivery address to fulfil the order.</p>

Legal obligation	<p>Boots will on occasion be under a legal obligation to obtain and disclose your personal data.</p> <p>Where possible Boots will notify you when processing your data due to a legal obligation, however this may not always be possible.</p>	<p>In order to prevent and detect fraudulent or criminal activity we may share information with forces such as the Police. This is done in a safe and secure manner. You may not be notified of this.</p> <p>Boots provides a range of clinical and healthcare services in partnership with, or on behalf of, NHS trusts, local health authorities and Clinical Commissioning Groups. As part of this, Boots are required to share certain amounts of personal data in order for the NHS and Boots to meet regulatory and legal obligations. Boots will tell you when we share your data for this reason.</p>
Legitimate interest	<p>Boots hold personal data for our own legitimate business interest. This relates to us managing our business to enable us to give you the best service/products and most secure experience. When we rely on this, we'll carry out a legitimate interest assessment to ensure we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws.</p> <p>Our legitimate business interests don't automatically override your interests - we won't use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or permitted to by law.</p>	<p>We may process your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.</p> <p>We have an interest in making sure our marketing is relevant for you, we send you marketing that's tailored to your interests.</p> <p>When you place an order on our website we carry out identity verification and anti-money laundering checks, validating the personal information you give against appropriate third-party databases. This involves sharing your personal data with organisations such as Datacash, which verify those details and transactions and pick up on anything that may indicate illegal activity. This may in some cases involve the disclosure of information to a Credit Reference Agency, which will keep a record of that information and may pass it to the police.</p>

### Keeping our records up to date

Whichever Boots services you use, wherever and however you interact with us, we want to give you the same level of service and make things simple and straightforward. We also have a legal obligation to keep the personal data we hold accurate and up to date.

In order to meet this legal obligation, to ensure we can recognise you as a customer and provide consistent care with whichever service you're using, we share and combine your personal data across our group companies to create a single master Boots customer record for each customer, containing the latest details you have provided us. Please note, we will only be able to create a single

master record for you if we have enough information from each individual area of Boots to enable us to correctly identify and match your customer records.

This means that when you engage with one of our services we will be able to recognise you as a customer and when you provide or update your personal details we will update your Boots customer record accordingly. This also means you don't need to give the same details each time you come in or engage with a new area of Boots.

For example, if you are an Advantage Card customer and visit an Opticians practice for the first time, colleagues in the Opticians practice will be able to recognise you as an existing Boots customer and will not need to ask you to provide all of your personal details again. Also, if you move to a new house and update your address when visiting a Boots Opticians, we will update your Advantage Card account to reflect this change. This will also apply for personal data provided or updated in your boots.com account, via calls to our contact centre, through our appointment booking system and via Boots Hearing Care.

If you've previously had a prescription dispensed at a Boots pharmacy, your Boots record may contain your contact details from our pharmacy system. These may be retrieved when we look up your details in another area of Boots, but rest assured we're unable to access any pharmacy details beyond your contact details.

Data provided to non-Boots brands such as premium beauty counters in our stores, direct to specific Boots brands such as Soap and Glory or Sleek and to services provided on our behalf such as Boots Kitchen Appliances or Boots Photo will not currently update your master Boots customer record.

### **Keeping our records up to date, can I opt out?**

Yes, we do this because it makes things more efficient both for you and for Boots. You can opt out but doing so will limit the Boots services you're able to use in the future. Your use of Boots pharmacy NHS services will remain unaffected.

### **How do I opt out?**

If you're a new customer on Boots.com, you should use the guest checkout rather than setting up a boots.com account as this will limit how Boots can use your data. If you're visiting a store for an eye test or other NHS clinical service, you should indicate your preference when asked.

If you're an existing customer, you can contact us via email or phone with your request. Note that if you close your account, we may continue to hold your personal information for a period of time after you cease to be a customer (see section headed "how long do we hold your data" below).

### **Building up a picture of you**

We analyse your personal information, including the products you view and buy, your browsing habits and other ways you interact with Boots to evaluate the effectiveness of our advertising and help us provide more relevant offers, advice and information across a variety of marketing channels including online advertising and social media sites such as Facebook. Rest assured that we'll only send you marketing material if you've agreed that we can.

We carry out analytics on the information we hold about our customers to help us understand who our customers are, how they use our services, and how people interact with us. This enables us to

plan our business - for example, stock and staffing levels make sure we offer the same experience online as in our stores, maximise the effectiveness of our advertising and understand how our business is performing. We don't do this in a way that enables individual customers to be identified. It's not related to the direct marketing or special offers that we send to you based on your use of Boots services.

### **Building a picture of you, can I opt out?**

You have the right to object to the way we use your data if you believe our legitimate interest in doing it is outweighed by your right to privacy. As this type of analysis is important in enabling Boots (like all major retailers) to operate efficiently and we carry it out in a way that doesn't identify individuals, we believe it has no impact on your privacy.

### **Information we get from external companies**

From time to time we may supplement the information we hold about you with data from other commercially available sources, like the electoral roll and companies such as Experian that collate and update data. This helps us keep our records up to date and learn more about our customers so we can continue to improve our products and services to them. We only work with organisations that obtain their data legally from publicly available or consent-based sources.

Occasionally, for marketing purposes, we may obtain lists of potential customers from external companies. We'll only deal with reputable companies that take privacy and data protection as seriously as we do and have obtained consent to share this data with us. We'll always let you choose not to receive further marketing material from us.

### **How long do we keep your personal information?**

We hold your personal information for as long as we have a legal or business reason to do so, which generally means as long as you remain a Boots customer or as required to meet our legal obligations, resolve disputes or enforce our agreements. To fulfil our obligations to the NHS, regulatory or similar bodies, health-related personal information may need to be retained for a period of time after you cease to be a Boots customer. We'll always store your data securely and won't use it for any other purpose.

## **Sharing your data**

### **Sharing with the NHS**

We share information with NHS bodies to fulfil our legal obligations as a provider of pharmacy, optical and hearing care services, or where we have a duty of care to do so. For example, to obtain payment for the services we provide and to measure the effectiveness of services.

In some circumstances we might need to let your GP know we've prescribed an item or given you a particular service.

If you've asked us to register you for an NHS scheme or service such as the NHS Organ Donor scheme, we'll pass your personal information to the NHS using a secure method of data transfer, so the NHS can register you for the relevant scheme or service.

Boots adheres to the NHS Data opt out. To exercise your right to opt out please visit the NHS website.

### **Non-Boots brands**

If you give your contact details and any other personal information at one of the premium beauty counters in our stores, you may be giving the information to that company rather than to Boots. Each company has its own Privacy Policy which may not be the same as ours, so we advise that you check who is collecting your personal information and how they'll use it before signing up to receive offers or information. Similarly, if you click through to another company's website via a link on [boots.com](https://www.boots.com), check you're happy with that company's Privacy Policy before giving your personal information.

### **Companies that provide services on our behalf**

We share your personal information with companies that provide services on our behalf. We always ensure these companies give your information the same level of care and security we do. If your information is to be sent outside of the UK or EEA (European Economic Area), we make sure it'll be subject to standards of protection and security that are as high as those Boots uses here in the UK.

Examples of the functions that may be carried out by external companies:

- Account set up and card issue
- Mailing houses and printers
- Online and social media advertising
- Delivery services such as couriers
- Market research
- Manufacturers or suppliers
- NHS bodies, such as GP and hospitals
- Payment providers
- Content providers, competitions, waiting lists etc.
- Fraud and money laundering checks
- IT services & support inclusive of web hosting, data storage, data cleansing, content providers
- Contact lens and glasses manufacturers and suppliers, and hearing care

### **Sharing data outside of the UK**

Boots shares information with countries inside and outside of Europe such as Republic of Ireland, Germany, US, Vietnam, China, India and Thailand. We make sure your data is subject to standards of protection and security that are as high as those Boots uses here in the UK.

### **Can I object to having my data shared?**

As your data is stored safely and securely both inside and outside of the EEA, we cannot offer alternative storage solution if you wish to object to having your data stored outside of the EEA. To do this, you'll need to close your account with Boots.

We'll always conduct a full review of our suppliers' processes and procedures including storage solutions for our data. To ensure adequacy when sending your data outside of the UK and EEA, we put in place contracts based on the Standard EU Model Contract Clauses to guarantee adequacy, we also use alternative safeguards where Standard EU Model Contract Clauses are not suitable.

## **Keeping in touch**

We will always ask you if you want to receive offers and information from us and via what channels you are happy to receive them. To make it easy and simple for you to provide and manage this information we have centralised your preferences across Advantage Card, boots.com (including those provided when signing up for waiting lists and samples) and Hearing Care into a single set of Boots communication preferences. This means that similar to providing your personal details to us, you only need to provide this information to us once and we will share and update your preferences across these business areas.

For example, opting in or out of marketing by a particular channel e.g. post or email when applying for an Advantage Card will opt you in or out of marketing for that channel across boots.com and Hearing Care as well.

Opticians are soon to join and centralise their preferences in line with these other areas. However, for now you will need to manage any changes to Opticians preferences separately to those outlined above.

Also, as with your personal data, any preferences provided to non-Boots brands such as premium beauty counters in our stores, direct to specific Boots brands such as Soap and Glory, Liz Earle or Sleek and to services provided on our behalf such as Boots Kitchen Appliances or Boots Photo will also need to be managed directly with these companies.

If you have opted into to receive email and digital communications, you will receive traditional emails but may also receive marketing online and via social media platforms.

If you have opted in to marketing using your lifestyle and health information, we will send you offers on healthcare products you buy, if you are a Boots Opticians customer, on glasses or contact lenses relevant to you or if you have participated in our health and wellness questionnaire. We will never use information about your Pharmacy prescriptions for marketing, although we may use it to let you know about services we provide that might be useful and relevant to you.

Some of our marketing selection processes are fully automated so that we can ensure we're selecting offers, products and services that are the most relevant for each customer. In order to do this, we use data that we've obtained from your use of the Advantage Card such as what brands or products you like to purchase, how frequently you shop with us, how much you spend with us and which of our stores you shop in the most. We combine this with demographic data that we obtained when you signed up for the scheme, such as your gender, your age and where you live – this is particularly relevant when inviting you to events. This aggregated data is then compared against our other customers to understand your shopping habits in context. By doing this, we can tell you about products we already know you like and also suggest new products that we think you'd be interested in based on what people like you are buying.

From time to time we may contact you with special offers on behalf of brands we stock, but we'll never sell or share your data with those brands for them to use in their own marketing preferences.



You can also click on the link at the bottom of any email we've sent you to opt out of email marketing.

Please be aware that as our marketing campaigns are prepared well in advance, you may still receive material by post for up to two months, and by e-mail or text for up to 28 days after updating your preferences.

### **Basket reminder emails**

When you visit our website as a registered customer that is opted-in to marketing emails, we will use your email address to contact you (via a third party) with a reminder containing a list of unpurchased items that are still in your basket.

### **Marketing, can I opt out?**

Yes, you can change your mind about receiving marketing material from us at any time by contacting our Customer Service Centre, by logging into your boots.com account to manage your Boots centralised preferences, by visiting an Opticians practice to manage your Opticians preferences or by following the unsubscribe link at the bottom of any of our emails.

### **Customer feedback surveys and market research**

Where you have used a Boots service we may invite you to give feedback on the services you've used or take part in market research activities such as customer surveys, questionnaires or focus groups. Although the invitation may be sent to you by third party agencies on our behalf, rest assured that we only send your contact details and, where relevant, data that we've collected through the use of your Advantage Card.

Please be aware that you won't be contacted more than once every six months for research purposes, unless you have signed up separately to our Viewpoint panel and we never sell your personal data to other research companies.

Boots will only ever share your data with reputable agencies in a safe and secure manner. All personal data is deleted as soon as it's been used. Keeping your data safe is our top priority.

### **Market research, can I opt out?**

Yes, you'll always be able to decline to take part in research activities and you can opt out of these types of communications from Boots. You can do this by following the unsubscribe link in any of our communications.

## **Online services**

### **Securing your payment details online**

[Boots.com](https://www.boots.com) has been issued with a Secure Server Digital Certificate by the online Certification Authority, Digicert. This confirms that [boots.com](https://www.boots.com) is a legitimate website that provides an encrypted communication channel to protect the information you pass to Boots when making a purchase. For more information please visit the [VeriSign](https://www.verisign.com) website.

All credit/debit card payments are securely handled by an industry-leading payment processor and are never stored on the Boots website.

### **Personalising your digital experience**

We use your personal data such as your browsing history, username and purchases to personalise our websites, apps, online media and communications so they're more relevant to you, giving you a better online experience. We do this through our use of Cookies and, where appropriate, information we have gathered about you from other interactions (e.g. products you buy or browse, or links that you have clicked on) or other sources (e.g. Advantage Card membership, including clubs that you have joined). For example, we may greet you by name, show search results that reflect things most likely to be of interest to you and show you content that's more relevant to you and the things you have previously shown an interest in.

### **Personalisation, can I opt out?**

Yes, but we believe it'll result in your online experience being less personal and relevant to you. The content and search results you see will be generic rather than related to your interests. Personalising your online experience doesn't affect the marketing options you have selected, it's to offer you a service personalised to your needs.

### **Personalisation, how do I opt out?**

If you're a registered customer you can email the contact details given below with your request. If you're not a registered customer, information held in our Cookies may be used to select content that we feel is more relevant for you. To prevent this, you can clear your cookies

### **Securing your personal details online**

To ensure we keep your personal data secure, we may ask you to complete an additional security verification check when you access your Boots personal information or communications preferences in your online account. If you do not pass this check, the data that you can view and amend may be limited but rest assured it will not impact your ability to manage any orders you have placed.

### **A list of the Cookies we use**

[Click here if you are looking for a full list of cookies that we use on this site](#). From time to time we may make changes to this list as we add or remove features from our website.

### **Amending Cookie preferences**

You can amend your cookie preference at any time by clicking the link found at the start of this policy. Click [here](#) if you are looking for a full list of cookies that we use on this site.

### **Your privacy and shared computers**

If you log in to boots.com from a shared computer, such as in an internet cafe or from a colleague's computer at work, Cookies may cause your e-mail address to display in the login field to anyone who uses the site on that computer after you. You can avoid this by clearing the Cookies stored by the

web browser. The option to do this is normally in the 'Tools' dropdown menu at the top of the browser window.

### **Information we get from the Boots mobile app**

By downloading the Boots app, you're giving Boots permission access certain information held on your phone for the purposes described below. Rest assured that we only use these permissions to provide the app and the services you request and use through it.

<b>Device ID and identity of the user</b>	Device information such as make and model of your phone, the version of the operating system and the version of the app that has been installed to allow Boots to accurately notify you of app updates and send notification messages if you have agreed that we may do so. This service is provided with the assistance of a third party, Urban Airship.
<b>Advantage Card activity</b>	If you choose to link your Advantage Card to the Boots App we're then able to provide you with personalised offers and messages. To do this effectively we'll track your interactions with these offers and messages, views, activations, and redemptions to ensure we continue to provide you with offers that we believe are in your interest.
<b>Location</b>	If you give permission for the Boots app to access location services, the app will use this data to improve the functionality of certain features. For example, by enabling the 'Store Locator' feature the app can access two different location options: 'approximate', where location is determined by accessing the network from your device, and 'precise', where GPS data is used in addition to network data for more accurate positioning.
<b>Wi-Fi and data</b>	The Boots app needs a connection to the internet in order to function, so it will access data services on your device (3G or 4G). It will connect to Wi-Fi networks, where available.
<b>Monitoring the functioning of the Boots app</b>	Google Crashlytics is used to help us monitor the functioning of our app and the way you engage with it. Anonymised app usage information is shared with Crashlytics for this purpose, but no personal data is shared. Click <a href="#">here</a> to read the Crashlytics Privacy Policy.

## **Boots Advantage Card Scheme**

### **Running our Advantage Card scheme**

Advantage Card offers great benefits and rewards, and we aim to make these as relevant to you as we can. In order to do so, we need your personal information. If you're a member of our Advantage Card scheme, we'll build up a picture of you based on your use of Boots services. This includes your online and offline shopping habits, your browsing habits, information you give us about yourself and through any clubs you're a member of (such as Parenting Club, Over 60s etc.) and any information you provide about your family.

By building up and fine-tuning this picture of you, we can provide you with tailored offers that are exciting and relevant to you. These might be sent to you via email, post, our websites or apps, or via

online advertising. Please note that we only send you marketing material if you've agreed that we can. Please refer to our 'Keeping in touch' section for further details

### **Can I object to this?**

The benefit of being an Advantage Card member is to receive points and rewards on the products and services that interest you. Without building up a detailed picture of you we can't tailor our offers and rewards to be personal to you and you won't receive the full benefits of being an Advantage Card member. If you don't wish to have your data used in this way, please contact us using the details provided below.

If you do not wish to have your personal data processed for any purpose related to the Advantage Card scheme, you'll not be able to have an Advantage Card. If you're an existing member, you therefore need to close your Advantage Card account. You'll still be able to shop at Boots and use our services, but you won't earn points or receive rewards.

### **Boots Pharmacy and Healthcare service**

As a healthcare provider, we're regulated by the General Pharmaceutical Council (GPhC), General Optical Council (GOC), Care Quality Commission (CQC), Pharmaceutical Society of Northern Ireland and the Regulation Quality Improvement Authority in Northern Ireland. All of which set out standards and codes of practice with which we need to comply. Where we provide NHS services in our pharmacies or Boots Opticians practices, we also have to comply with NHS Information Governance requirements.

### **Information we get when we acquire new Pharmacy or Optical businesses**

If you're a customer of an optician or pharmacy business that has been taken over by Boots, we'll receive your personal information from them as part of the handover process. Where this happens, we place a notice in-store or we may contact you in writing to tell you that your personal information is changing hands. If you don't wish for your data to be transferred to Boots, you should speak to the store manager.

### **Information we get from the NHS: your GP or healthcare professional**

Electronic Prescription: by using the Boots NHS repeat prescription service, you are allowing your GP surgery to send your prescriptions electronically to a Boots pharmacy. If you choose to get your order delivered, our centralised Boots pharmacy will handle your electronic prescriptions. If instead you choose to collect your order in store, your chosen Boots store will handle your electronic prescriptions.

You or the surgery will provide us with your details, so we can register you on the electronic prescription system and resolve any problems or queries that may arise in connection with it.

### **Healthcare services, can I opt out?**

Yes, you can call your dispensing Boots pharmacy or your GP and ask them to opt you out of the electronic prescription service.

## **Information we get from the NHS: your Summary Care Record**

In England, the NHS is using an electronic record called the Summary Care Record (SCR) to support patient care. A similar service is also provided in Wales. The SCR is a copy of key information from your GP record, and it provides authorised health care professionals with faster, secure access to information about you when you need care. The NHS has made the SCR available to pharmacies across England, and it's now in use in many Boots pharmacies.

Our pharmacists may need to refer to your SCR if you need urgent treatment or medication out of hours, or in other emergency situations where your pharmacist would normally need to speak with your GP but cannot do so. The pharmacist will ask for your consent every time they need to look at your SCR, except if you're unconscious or otherwise unable to communicate and they believe it's in your best interests to look at your record.

Your SCR is not combined with any data Boots holds about you. It's held on an NHS system and is accessed only in the circumstances set out above.

You can find out more about the Summary Care Record [here](#).

## **Dispensing prescriptions**

The information we hold on your personal medical record is used to enable us to dispense your prescription legally, safely and to fulfil our requirements to you and the NHS.

In the event that Boots needs to administer emergency medication, where possible, we will share information about what was administered and why with the ambulance staff, doctors and key workers to ensure further treatment and monitoring can be carried out appropriately and you as the patient receive complete care.

## **Prescription detail**

We do not use information about your prescriptions for marketing, although we may use the fact that we know you have attended a pharmacy or used an online service to let you know about other services we provide that might be useful and relevant to you.

For example, when you collect a prescription a Boots pharmacist might ask if you'd like to take advantage of our New Medicines Service, a Medicines Use Review, Diabetic Support Services or other similar services that may be relevant and useful to you. Or, we may use the fact you have interacted with our pharmacy to send you communications via Advantage Card (where you have consented) to let you know about other pharmacy services that we think are relevant to you.

These services are voluntary, but if you choose to use them we'll need to ask you some health-related questions in order to fulfil our contractual obligations with the NHS. The information you give us will only be shared with the relevant NHS bodies and we won't use it for any other purpose.

## **Prescription services, can I opt out?**

No, if you request Boots Pharmacy to carry out this service we need to use this information to dispense your prescription safely and legally.

## **Online pharmacy services**

If you purchase Pharmacy medicines from our online clinics, we will ask you some questions about your health to help us check that the medicine you are buying is suitable for you. This information is held securely on our systems and used for processing your order.

Similarly, if you use our Prescription Dispensing and Delivery Service, we will ask you to give us some health-related information online. This information is held securely on our Pharmacy system to allow Pharmacy staff in Boots stores to check your prescription history and medical conditions, ensuring you receive the best possible service from us.

We may contact you by email or phone number about your online clinic order or prescription so please ensure that you're happy with the security and privacy of the email account you use in connection with this. Please note that if you send an email directly to our Pharmacy Service from your own email account, its contents may not be encrypted and therefore cannot be guaranteed to be secure.

Please note that if you access our service using your NHS login details, the identity verification services are managed by NHS Digital. NHS Digital is the controller for any personal information you provided to NHS Digital to get an NHS login account and verify your identity and uses that personal information solely for that single purpose. For this personal information, our role is a "processor" only and we must act under the instructions provided by NHS Digital (as the "controller") when verifying your identity. To see NHS Digital's Privacy Notice and Terms and Conditions, please click [here](#). This restriction does not apply to the personal information you provide to us separately.

When registering for or placing an order with the Boots online prescription service, we may use the personal information provided by you, to compare and update that information with the data held in the NHS Personal Demographics Service. This will help us identify you and link your prescription request with your GP surgery.

Keeping your details up to date and accurate is part of the services provided to you. If you do not want your personal details to be updated, you can edit them in the order summary before placing your order.

NHS Digital is the Data Controller for the Personal Demographic Service.

## **Online pharmacy, can I opt out?**

Yes, to not be contacted by email or phone about your orders or prescriptions please unsubscribe to this service by deactivating your account.

## **Healthcare analytics**

We carry out analytics on data about the prescriptions we dispense, which enables us to understand how our business is operating so we can develop our products and services. It also enables us to provide valuable insights about dispensing activity which we may share with partner organisations. Before we undertake any such analytics with pharmacy data, we anonymise it in line with the ICO Anonymisation Standards, so it's not linked to you and you cannot be identified from it.

## **Healthcare/clinical research and market research**

As a pharmacy-based retailer, research is vital to our business. We work with leading universities, healthcare and pharmaceutical companies and other bodies carrying out healthcare research. This may involve providing anonymised and/or aggregated data about our dispensing activities. We have a strict process for assessing research requests and we only agree to take part in projects that have received ethical approval. Where any third party has access to Boots premises or data, we have measures in place to ensure they access only the data we've authorised them to access and for purposes of the research only.

Being able to conduct, participate and contribute to this type of data enables Boots to assist with helping to find cures and better solutions for healthcare, which will hopefully go on to benefit the healthcare of the public and our customers.

Occasionally, we contact customers who meet a particular set of criteria, including health-related factors, to invite them to take part in clinical research. The research may be carried out by external companies acting on our behalf, but we'll never pass your personal information onto them unless we have your consent to do so. You're always free to decline or withdraw your consent at any time by contacting us.

On occasion, we may work with researchers who are looking for volunteers to take part in various research studies. Therefore, our pharmacists in store may ask if you're willing to take part in this type of research. If you're interested in hearing more, we may then put you in touch with the researchers who will provide you with all of information required and ask for your consent before any research begins. In such cases, Boots doesn't receive any details about people who decide to take part in the research, and your data will be processed by the researcher

### **Clinical research and market research, can I opt out?**

We believe this is an important activity that will benefit the public and may lead to a breakthrough in the healthcare sector. The data we use or provide is anonymised in line with ICO guidance, it's no longer personal data and you can't exercise a right to opt out. You can opt out of participating in market research that you have volunteered to take part in, where we use and store identifiable personal data.

## **Dispensing services: care homes**

If you or a relative are a resident of a care home to which Boots provides dispensing services, Boots will receive personal information from the care home to enable us to dispense prescriptions safely and comply with our legal and regulatory obligations.

Please be assured that information we hold about prescriptions that we've dispensed aren't included in the picture we build up of you.

## **Staying in control of your information: Your rights**

We respect the fact that your personal information is **your** information, and we'll make it easy for you to update or change your personal details or marketing permissions. Please help us to help you

by letting us know if your contact details change, or if you spot any errors in the information we hold about you.

### What information am I entitled to?

Your data rights are explained below, all of which are free of charge and should be concluded within a 30-day time frame. We may require you to provide identification in order to fulfil your request.

Access	You have a to right to obtain a copy of all the information that Boots holds about you, such as personal details, correspondence, marketing preferences, consent information, complaints, queries and Advantage Card history.
Portability	You can request that Boots moves your data to another service provider. This is not an automatic right; this depends on the type of data that Boots holds about you and the reason Boots process the data.
Processing	You have a to right to request that Boots stop certain data processing activities that involve your personal data. This isn't an automatic right, what Boots are able to do will depend on the type of data that Boots hold about you and why
Deletion	You have a right to request that Boots deletes your personal data it holds. This isn't an automatic right, what Boots are able to delete will depend on the type of data and the reason for processing.
CCTV	<p>In our stores, we use video and, in some places, audio recording to prevent and detect crime and anti-social behaviour. Where we do this, we display clear signage, comply with the Information Commissioner's Surveillance Camera Code of Conduct, and have internal processes in place to minimise the impact on your privacy.</p> <p>If you require access to CCTV footage, we'll ask the date and approximate time of the incident you wish to view and as much detail as you can to help us locate the correct footage.</p> <p>CCTV is held for a 30-day period. We'll do our best to help, but there are situations in which we may be unable to make CCTV footage available to you, such as where the incident occurred some time ago or if we believe that allowing you to view it would breach someone else's privacy.</p> <p>Technologies associated with our CCTV systems will be used for the purpose of collecting non-identifiable analytical data e.g. to understand how long our customers wait in queues when making a purchase or using services within our stores. You cannot be identified by the use of these technologies.</p>
Social Media	If you raise a query or a complaint through Boots' social media pages, we will of course have a record of your username. This is used only to enable us to correspond with you and resolve the matter you've raised.



## **About this Policy**

### **Who to contact**

If you have an enquiry or concern about the contents of our Privacy Policy or our handling and use of your data, please email the Privacy Team or our Data Protection Officer on [boots.customercare\\_team@boots.co.uk](mailto:boots.customercare_team@boots.co.uk)

For all other questions relating to this policy please also contact [boots.customercare\\_team@boots.co.uk](mailto:boots.customercare_team@boots.co.uk)

### **Your right to complain to the ICO**

Although we hope it never comes to this, you do have the right to complain to the Information Commissioners Office (ICO) about any of Boots processing activities at [casework@ico.org.uk](mailto:casework@ico.org.uk)

### **Changes to our business**

If ownership of all or part of our business changes, or we undergo a reorganisation (including a merger or transfer between Walgreens Boots Alliance companies), we'll transfer your personal information to the new owner or successor company, so we can continue to provide the services.

### **Changes to this Privacy Policy**

This Privacy Policy was updated in January 2023. We may update it from time to time, so we recommend that you check back here occasionally. If we make changes, we think may affect you significantly, particularly if they could have an impact on the choices you have made or your marketing preferences, we'll provide you with a prominent notice.