

# Privacy Policy

**Encon Pharma Ltd**

**Effective Date: February 2026**

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## 1. Introduction

Encon Pharma Ltd (“Encon”, “we”, “us”, “our”) is a Software-as-a-Service (SaaS) provider delivering digital solutions that support pharmacies in managing and delivering New Medicine Service (NMS) consultations and related pharmacy services.

We are committed to protecting personal data in accordance with:

- The UK Data Protection Act 2018 (DPA 2018)
- The UK General Data Protection Regulation (UK GDPR)

The UK data protection supervisory authority is the Information Commissioner's Office (ICO).

This Privacy Policy explains how we process personal data when providing our platform and related services.

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## 2. Our Role

### A. As a Data Processor

In most cases, Encon Pharma acts as a Data Processor.

We process patient and pharmacy staff data on behalf of pharmacy groups and independent pharmacies, who act as the Data Controllers. These pharmacies determine:

- The purpose of the data processing
- The type of patient information collected
- The lawful basis for processing

Encon Pharma processes data strictly in accordance with written contracts and instructions from pharmacy clients.

## **B. As a Data Controller**

We act as a Data Controller for:

- Our own staff data
  - Business contact data (e.g., pharmacy managers, owners, group representatives)
  - Website user data
  - Supplier and partner information
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## **3. What Our Platform Does**

Encon Pharma provides a SaaS platform that enables pharmacies to:

- Manage and record New Medicine Service (NMS) consultations
- Store consultation records
- Track follow-ups
- Generate compliance reports
- Monitor service performance
- Manage pharmacy user accounts

Encon Pharma does **not** provide clinical care directly to patients.

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## **4. Personal Data We Process (As a Processor)**

On behalf of pharmacy clients, we may process:

### **Patient Data**

- Name
- Date of birth
- Contact details

- NHS number (where applicable)
- Prescription information
- Medicines information
- Consultation notes
- Relevant medical information required for NMS delivery

This may include **special category data (health data)** under UK GDPR.

We process this data solely under the instructions of the pharmacy Data Controller.

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## **5. Personal Data We Collect (As a Controller)**

For business operations, we may collect:

### **Pharmacy Staff & Business Users**

- Full name
- Work email address
- Work telephone number
- Job title
- Login credentials
- Platform usage data

### **Website Users**

- IP address
- Browser type
- Device information
- Cookies and analytics data

## **Suppliers and Partners**

- Contact details
  - Financial and billing information
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## **6. Lawful Basis for Processing**

### **When Acting as a Processor**

The lawful basis is determined by the pharmacy Data Controller. This is typically:

- Legal obligation
- Public task (NHS services)
- Provision of healthcare
- Consent (where required)

### **When Acting as a Controller**

We rely on:

- Contractual necessity
  - Legal obligation
  - Legitimate interests
  - Consent (where required)
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## **7. Data Sharing**

We may share data with:

- Approved cloud hosting providers
- IT support providers
- Regulatory authorities where legally required

- Law enforcement agencies where required by law

We do not sell personal data.

All third-party processors are subject to strict data processing agreements.

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## **8. Data Security**

We implement appropriate technical and organisational measures, including:

- Encrypted data transmission (SSL/TLS)
- Role-based access controls
- Secure cloud infrastructure
- Audit logs
- Regular security reviews
- Staff confidentiality obligations

Access to patient data is restricted on a strict need-to-know basis.

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## **9. Data Retention**

As a Processor:

We retain patient data in accordance with the pharmacy client's instructions and contractual agreements.

As a Controller:

We retain business and operational data only for as long as necessary to:

- Fulfill contractual obligations
  - Meet regulatory requirements
  - Resolve disputes
  - Maintain business records
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## **10. Data Subject Rights**

Patients should normally direct their data protection requests to their pharmacy (the Data Controller).

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction
- Request deletion
- Request restriction of processing
- Object to processing
- Request data portability
- Lodge a complaint with the Information Commissioner's Office

Where Encon Pharma receives a request directly relating to pharmacy-controlled data, we will forward it to the relevant pharmacy.

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## **11. International Transfers**

Where data is transferred outside the UK, we ensure appropriate safeguards are in place, such as:

- UK International Data Transfer Agreements (IDTAs)
  - Standard Contractual Clauses
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## **12. Automated Decision-Making**

Encon Pharma does not make solely automated decisions that significantly affect individuals without human involvement.

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## **13. Data Breach Management**

We maintain incident response procedures. Where required, we notify pharmacy clients promptly of any personal data breach to enable compliance with reporting obligations to the Information Commissioner's Office.

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#### **14. Contact Details**

If you have any questions about this Privacy Policy:

##### **Data Protection Officer**

Encon Pharma Ltd

Email: [encon@enconpharma.com](mailto:encon@enconpharma.com)

Registered Address: Encon House, 4 Mornington Villas, Bradford, BD8 7HB

If you are a patient, please contact your pharmacy in the first instance.

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#### **15. Updates to This Policy**

We reserve the right to update this Privacy Policy periodically. Any material changes will be reflected with a revised effective date.