

PRIVACY POLICY

Media Activation Ltd

In connection with HealthPoint TV Pharmacy Screen Network

Version 1.0 | Effective Date: 21 June 2026

1. Introduction and Identity of the Controller

This Privacy Policy is issued by Media Activation Ltd, a company incorporated in England and Wales ("Media Activation", "we", "us" or "our"). It explains how we collect, use, disclose and otherwise process personal data in connection with our management of advertising campaigns on behalf of the HealthPoint TV pharmacy screen network ("HealthPoint TV"), which operates across pharmacies and healthcare retail environments throughout the United Kingdom.

Media Activation Ltd acts as a data controller in respect of personal data it processes for its own legitimate business purposes, and as a data processor in respect of personal data processed on behalf of its advertising clients. Where we act as a data processor, we do so strictly in accordance with the documented instructions of the relevant controller.

Registered Office: Albany House 3, Temple Court, Temple Way, Coleshill, Warcs B46 1HH

Company Registration Number: 11356572

Data Protection Contact: julian@mediaactivation.co.uk

This Policy should be read in conjunction with any campaign-specific data processing agreements, advertiser terms of engagement and the HealthPoint TV network operator agreements as applicable.

2. Scope of This Policy

This Policy applies to the following categories of data subjects whose personal data Media Activation Ltd may process:

- Visitors to pharmacies and retail healthcare sites at which HealthPoint TV screens are installed;
- Employees, contractors, and representatives of advertising clients who engage Media Activation Ltd to plan and deliver campaigns on the HealthPoint TV network;
- Healthcare professionals and pharmacy staff at network locations, to the extent their data is collected in connection with campaign delivery or audience intelligence;
- Suppliers, service providers, and technology partners engaged by Media Activation Ltd in the delivery of its advertising operations;
- Visitors to any digital properties maintained by Media Activation Ltd in connection with HealthPoint TV.

This Policy does not apply to the separate data processing activities of individual pharmacy operators or the HealthPoint TV network proprietor, who are independent data controllers and maintain their own privacy notices.

3. Categories of Personal Data We Process

3.1 Audience Analytics Data

In connection with the delivery and measurement of advertising campaigns on HealthPoint TV screens, we may process the following categories of audience data:

- Aggregated and anonymised footfall and dwell-time statistics derived from in-store sensor or camera technologies operated by the network proprietor or its technology partners;
- Inferred demographic profiles (e.g. estimated age range, gender) generated by privacy-preserving audience measurement technology that does not identify specific individuals;
- Campaign performance metrics including screen impressions, display frequency, and audience engagement proxies.

Where HealthPoint TV audience measurement technologies are deployed in pharmacy environments, such systems are operated in strict compliance with applicable ICO guidance on the use of AI-enabled cameras and sensors in public and retail spaces. No biometric data that uniquely identifies a natural person is collected or retained by Media Activation Ltd.

3.2 Client and Advertiser Data

We collect and process personal data relating to employees and representatives of our advertising clients and media agency partners, including:

- Full name, job title, and professional contact details (telephone, email, business address);
- Communications records, including emails, meeting notes, and briefing documents;
- Financial and billing information necessary for the administration of campaign contracts;
- Login credentials and access data relating to client-facing reporting portals or dashboards.

3.3 Supplier and Partner Data

We process personal data of individuals employed or engaged by our suppliers and technology partners, limited to information necessary to manage those commercial relationships, including contact details, contractual correspondence, and payment data.

3.4 Special Category Data

Media Activation Ltd does not intentionally collect or process special category personal data (as defined in Article 9 of the UK GDPR), including data concerning health, religion, political opinions, or sexual orientation, in connection with its advertising operations. Advertising campaigns placed on the HealthPoint TV network may be healthcare-related in content; however, the mere exposure of audiences to healthcare-related advertising on public screens does not constitute the processing of health data.

Where any campaign creative or targeting approach is proposed that could be considered to engage special category considerations, Media Activation Ltd will conduct a targeted data protection impact assessment prior to deployment.

4. Lawful Basis for Processing

Media Activation Ltd processes personal data only where a valid lawful basis exists under UK data protection law. The following bases apply to our activities:

4.1 Legitimate Interests (Article 6(1)(f) UK GDPR)

We rely on legitimate interests for:

- The processing of aggregated, privacy-preserving audience analytics to measure and report campaign performance;
- Maintaining professional contact information of client and supplier representatives for account management purposes;
- Detecting and preventing fraudulent activity, network misuse, or invalid traffic within our campaign delivery infrastructure;
- Internal business analytics, forecasting, and product development activities.

In each case, we have conducted a legitimate interests assessment and are satisfied that our interests are not overridden by the rights and interests of the data subjects concerned, particularly given the nature and limited scope of the data processed.

4.2 Performance of a Contract (Article 6(1)(b) UK GDPR)

We rely on contractual necessity for processing personal data of client contacts and supplier representatives to the extent required to:

- Execute campaign delivery agreements, insertion orders, and service contracts;
- Process invoices and manage financial administration;
- Provide contracted campaign reporting and account management services.

4.3 Compliance with a Legal Obligation (Article 6(1)(c) UK GDPR)

We process personal data where necessary to comply with our legal obligations, including applicable tax, financial reporting, employment, and regulatory requirements.

4.4 Consent (Article 6(1)(a) UK GDPR)

Where consent is the appropriate lawful basis, for example in connection with any opt-in communications or the use of cookies on digital properties maintained by Media Activation Ltd, we will obtain freely given, specific, informed, and unambiguous consent and maintain appropriate records thereof. Withdrawal of consent can be exercised at any time and will not affect the lawfulness of processing carried out prior to withdrawal.

5. Purposes for Which We Use Personal Data

Personal data collected by Media Activation Ltd is used for the following purposes:

- Planning, booking, trafficking, and delivering advertising campaigns on the HealthPoint TV screen network;
- Generating post-campaign performance reports and audience insight analysis for advertising clients;
- Managing contractual and commercial relationships with clients, agency partners, and suppliers;
- Communicating with clients and partners regarding campaign status, scheduling, creative specifications, and financial administration;
- Improving the planning tools, audience measurement methodologies, and campaign delivery systems operated by Media Activation Ltd;
- Complying with applicable legal and regulatory obligations;

- Exercising or defending legal claims.

We do not use personal data for automated decision-making that produces legal or similarly significant effects on individuals without appropriate safeguards.

6. Disclosure of Personal Data to Third Parties

Media Activation Ltd does not sell personal data to third parties. We may share personal data with the following categories of recipient where necessary and proportionate:

6.1 HealthPoint TV Network Operator

We share campaign data, audience analytics, and scheduling information with the operator of the HealthPoint TV network as necessary for the delivery of campaigns and the fulfilment of network booking obligations. The HealthPoint TV operator is an independent data controller in respect of its own pharmacy screen operations.

6.2 Advertising Clients

Post-campaign reports, audience performance data, and relevant operational information are shared with the advertising clients on whose behalf campaigns are managed. Where clients are data controllers for particular processing activities, such sharing is governed by the terms of the relevant data processing agreement.

6.3 Technology and Service Providers

We engage third-party technology providers for campaign management software, audience measurement tools, data analytics, cloud hosting, and financial administration. These providers act as data processors on our behalf and are bound by contractual obligations consistent with Article 28 UK GDPR, including requirements to process data only on our documented instructions and to maintain appropriate technical and organisational security measures.

6.4 Professional Advisers

We may share personal data with legal advisers, accountants, auditors, and insurers as necessary in connection with the conduct of our business.

6.5 Regulatory and Law Enforcement Authorities

We will disclose personal data to competent authorities, courts, or regulators where required to do so by applicable law, court order, or binding regulatory direction, including the Information Commissioner's Office.

6.6 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of all or part of our business, personal data held by Media Activation Ltd may be transferred to the relevant successor entity, subject to appropriate confidentiality and data protection commitments.

7. International Transfers of Personal Data

Media Activation Ltd is headquartered in the United Kingdom and our primary data processing activities take place within the UK and the European Economic Area. Where we engage third-party technology or service providers whose infrastructure is located outside

the UK or EEA, we ensure that any transfer of personal data is subject to appropriate safeguards as required by Chapter V of the UK GDPR, including:

- Transfer to countries or organisations covered by an adequacy regulation made under section 17A of the Data Protection Act 2018;
- Execution of the International Data Transfer Agreement (IDTA) approved by the ICO, or the ICO Addendum to the EU Standard Contractual Clauses, as applicable; or
- Reliance on other lawful transfer mechanisms approved by the ICO from time to time.

A copy of the relevant transfer mechanism can be made available to data subjects upon request.

8. Retention of Personal Data

Media Activation Ltd retains personal data only for as long as is necessary to fulfil the purposes for which it was collected, or as required by applicable legal, regulatory, or contractual obligations. Our indicative retention periods are as follows:

- Campaign delivery and performance data: 3 years from campaign completion, or such longer period as required by client contract;
- Client and agency contact records: for the duration of the business relationship and 6 years thereafter, in accordance with the Limitation Act 1980;
- Financial and transactional records: 7 years, in accordance with HMRC requirements;
- Supplier and partner records: for the duration of the relevant contract and 6 years thereafter;
- Correspondence and communications records: 3 years, unless relevant to ongoing or anticipated legal proceedings.

Where personal data is held in anonymised or aggregated form only, such that it no longer constitutes personal data for the purposes of UK data protection law, it may be retained for longer periods for legitimate analytical and business intelligence purposes.

9. Security of Personal Data

Media Activation Ltd implements appropriate technical and organisational measures to ensure a level of security appropriate to the risks presented by our processing activities, taking into account the nature, scope, context, and purposes of processing and the likelihood and severity of risks to the rights and freedoms of natural persons. Our security measures include, without limitation:

- Encryption of personal data in transit and at rest;
- Role-based access controls and the application of the principle of least privilege;
- Multi-factor authentication for access to systems containing personal data;
- Regular penetration testing and vulnerability assessments of our technical infrastructure;
- Staff training and awareness programmes on data protection obligations;
- Supplier due diligence and contractual security requirements imposed on all data processors engaged by us;
- Business continuity and data recovery procedures.

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of natural persons, Media Activation Ltd will notify the ICO within 72 hours of becoming aware of the breach and will communicate with affected individuals where required by applicable law.

10. Rights of Data Subjects

Subject to applicable legal exemptions and restrictions, individuals whose personal data is processed by Media Activation Ltd have the following rights under UK data protection law:

10.1 Right of Access

You have the right to obtain confirmation of whether we process personal data about you, and to receive a copy of such data together with supplementary information about our processing activities.

10.2 Right to Rectification

You have the right to require us to correct inaccurate personal data concerning you and to complete incomplete personal data.

10.3 Right to Erasure

You have the right to request deletion of your personal data where it is no longer necessary for the purposes for which it was collected, where consent is withdrawn and no other lawful basis applies, or where the data has been unlawfully processed. This right is subject to limitations where processing is required for legal compliance or the exercise or defence of legal claims.

10.4 Right to Restriction of Processing

You have the right to request that we restrict the processing of your personal data in certain circumstances, including where the accuracy of the data is contested or where processing is unlawful but you do not wish erasure.

10.5 Right to Data Portability

Where processing is based on consent or contractual necessity and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit that data to another controller.

10.6 Right to Object

You have the right to object at any time to the processing of your personal data where we rely on legitimate interests as our lawful basis. We will cease such processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

10.7 Rights in Relation to Automated Decision-Making

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects. Media Activation Ltd does not engage in such processing.

10.8 Exercising Your Rights

Requests to exercise any of the above rights should be directed to:

Data Protection Contact: [Insert Email Address]

Postal Address: [Insert Address]

We will respond to all valid requests within one calendar month of receipt. This period may be extended by up to two further months where requests are complex or numerous, in which case we will notify you of the extension and the reasons therefor within the initial one-month period.

We will not charge a fee for the exercise of data subject rights unless requests are manifestly unfounded or excessive, in which case we may charge a reasonable administrative fee or refuse to act on the request.

11. Right to Lodge a Complaint

If you are dissatisfied with the manner in which Media Activation Ltd has handled your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the supervisory authority for data protection matters in the United Kingdom:

ICO Website: www.ico.org.uk

ICO Helpline: 0303 123 1113

ICO Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We would, however, welcome the opportunity to address any concerns you may have before you approach the ICO and invite you to contact us in the first instance using the contact details set out in Section 10.8 above.

12. Cookies and Digital Tracking Technologies

To the extent that Media Activation Ltd operates digital properties in connection with HealthPoint TV (including client portals, reporting dashboards, or marketing websites), we may use cookies and similar tracking technologies. Detailed information about the cookies used on any such properties, including their purposes, duration, and the controls available to users, is set out in our Cookie Policy, which is available at [Insert URL].

Where non-essential cookies are used, we obtain consent in accordance with the Privacy and Electronic Communications Regulations 2003 (PECR) and applicable ICO guidance prior to their placement.

13. Children's Personal Data

The services provided by Media Activation Ltd are directed to commercial clients and professional counterparties and are not intended for use by children under the age of 18. We do not knowingly collect personal data from children. HealthPoint TV screen campaigns may be displayed in pharmacy environments accessible to the general public including children; however, no personal data is collected from viewers of such screens in connection with Media Activation Ltd's campaign management activities.

Advertising content placed on the HealthPoint TV network is subject to applicable advertising codes and standards, including those of the Advertising Standards Authority (ASA) and the

Committee of Advertising Practice (CAP), which impose specific restrictions on advertising directed at or likely to be seen by children.

14. Healthcare Advertising and Regulatory Compliance

Given the healthcare context of the HealthPoint TV network, Media Activation Ltd acknowledges the additional regulatory obligations applicable to healthcare advertising in the United Kingdom. All campaigns managed by Media Activation Ltd on the HealthPoint TV network are required to comply with:

- The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code), including the Healthcare section thereof;
- The Medicines and Healthcare products Regulatory Agency (MHRA) guidance on the advertising of medicines;
- Medicines Act 1968 and the Human Medicines Regulations 2012 in respect of any prescription-only medicine or pharmacy-only medicine advertising;
- General Pharmaceutical Council (GPhC) standards applicable to pharmacy premises and professional practice;
- The Prescription Medicines Code of Practice Authority (PMCPA) Code of Practice where applicable.

Media Activation Ltd does not accept responsibility for the regulatory compliance of creative content supplied by advertising clients but shall take reasonable steps to identify and decline campaigns that are manifestly non-compliant with applicable healthcare advertising regulations.

15. Changes to This Privacy Policy

Media Activation Ltd reserves the right to update or amend this Privacy Policy from time to time to reflect changes in our processing activities, legal obligations, regulatory guidance, or business operations. Material changes to this Policy will be communicated to advertising clients and relevant stakeholders by email or through our client-facing systems. The version date appearing at the head of this document indicates when the Policy was last reviewed and updated.

We encourage data subjects to review this Policy periodically. Continued engagement with our services following notification of material changes will constitute acknowledgement of the updated Policy.

16. Governing Law and Jurisdiction

This Privacy Policy is governed by and shall be construed in accordance with the laws of England and Wales. Any disputes arising in connection with this Policy or the data processing activities described herein shall be subject to the exclusive jurisdiction of the courts of England and Wales, without prejudice to the rights of data subjects to bring complaints before the Information Commissioner's Office.

Where Media Activation Ltd processes the personal data of individuals located in the European Economic Area, such processing shall additionally be subject to the applicable national data protection laws of the relevant EEA member state.

17. Definitions

In this Privacy Policy, unless the context otherwise requires:

- “Data Protection Act 2018” means the Data Protection Act 2018 of England and Wales, as amended from time to time;
- “HealthPoint TV” means the pharmacy-based digital screen advertising network operated across the United Kingdom in connection with which Media Activation Ltd provides campaign management services;
- “ICO” means the Information Commissioner’s Office, the supervisory authority for data protection in the United Kingdom;
- “PCR” means the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426), as amended;
- “personal data”, “processing”, “data controller”, “data processor”, and “data subject” have the meanings given to them in the UK GDPR;
- “UK GDPR” means Regulation (EU) 2016/679 as it forms part of domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018, as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 and any successor legislation.

— *END OF PRIVACY POLICY* —

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