

PRIVACY POLICY

Media Activation Ltd

In connection with Vistavue GP 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 Vistavue GP screen network ("Vistavue GP"), which operates digital screens across general practice surgeries, primary care centres, and NHS-affiliated healthcare facilities 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 Vistavue GP network operator agreements as applicable. Given the primary care setting of the Vistavue GP network, this Policy reflects heightened data protection obligations applicable to processing activities in clinical and patient-facing environments.

2. Scope of This Policy

This Policy applies to the following categories of data subjects whose personal data Media Activation Ltd may process in connection with the Vistavue GP network:

- Patients and members of the public attending GP surgeries and primary care premises at which Vistavue GP screens are installed;
- Employees, contractors, and representatives of advertising clients who engage Media Activation Ltd to plan and deliver campaigns on the Vistavue GP network;
- General practitioners, practice managers, clinical staff, and administrative personnel at network locations, to the extent their data is collected in connection with campaign delivery, network administration, or audience intelligence;
- NHS commissioners, integrated care board representatives, or other healthcare system stakeholders engaged in connection with the Vistavue GP network;
- 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 Vistavue GP.

This Policy does not apply to the separate data processing activities of individual GP practices, primary care networks, NHS trusts, or the Vistavue GP network proprietor, each of

whom is an independent data controller and is required to maintain its own privacy notices. In particular, GP practices processing patient health records and clinical data do so in their capacity as data controllers independent of any advertising activities facilitated by Media Activation Ltd.

3. Categories of Personal Data We Process

3.1 Audience Analytics Data

In connection with the delivery and measurement of advertising campaigns on Vistavue GP screens, we may process the following categories of audience data, subject in each case to strict privacy-preserving constraints appropriate to a primary care environment:

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

Media Activation Ltd recognises that GP surgeries and primary care premises are environments in which patients may reasonably have heightened expectations of privacy and dignity. Accordingly, audience measurement systems deployed on the Vistavue GP network are designed and operated to ensure that no personal data identifying individual patients is collected, retained, or processed by Media Activation Ltd. All audience analytics are conducted at an aggregated, statistical level only. No audience measurement data is linked to, or capable of being linked to, any patient's medical record or clinical information.

Any audience measurement technologies deployed by the Vistavue GP network operator within GP premises are subject to compliance with ICO guidance on surveillance in sensitive environments, the NHS Data Security and Protection Toolkit requirements applicable to the relevant data flows, and applicable guidance from NHS England and the Department of Health and Social Care.

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 GP Practice and Healthcare Professional Data

In connection with network administration and the onboarding of GP practice locations onto the Vistavue GP network, we may process contact data of practice managers, practice administrators, and other non-clinical staff acting as network liaisons. Such data is limited to professional contact information and is processed solely for the purpose of managing the

commercial and operational relationship between Media Activation Ltd and the relevant practice location. Media Activation Ltd does not process the personal clinical data of GPs or other healthcare professionals in connection with its advertising campaign management activities.

3.4 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.

3.5 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 on the Vistavue GP network.

We acknowledge that the deployment of advertising screens within GP surgeries and primary care premises creates heightened sensitivity around the potential inference of health information. A patient's mere presence in a GP waiting room could, in principle, be regarded as suggestive of health-related information. Media Activation Ltd therefore maintains the following specific safeguards in connection with the Vistavue GP network:

- No audience measurement data collected on the Vistavue GP network is used to infer, record, or derive any health-related characteristic of any identifiable individual;
- No advertiser is granted access to audience data at a granularity that could permit the identification of individual patients or the inference of health conditions from screen exposure data;
- All campaign creative and targeting strategies for the Vistavue GP network are reviewed to ensure they do not exploit the clinical context of the viewing environment in a manner that could be considered intrusive or contrary to patient dignity;
- Where any proposed campaign or measurement methodology could engage special category data considerations, Media Activation Ltd will conduct a data protection impact assessment (DPIA) in accordance with Article 35 UK GDPR and, where required, consult with the ICO prior to implementation.

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 on the Vistavue GP network;
- Maintaining professional contact information of client, practice liaison, 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. Given the sensitive primary care setting of the Vistavue GP network, particular weight has been given to the reasonable expectations of individuals present in GP waiting environments, and our processing is confined to the minimum necessary to fulfil the relevant legitimate purpose.

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

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

- Execute campaign delivery agreements, insertion orders, and network 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, as well as any obligations arising under NHS data security frameworks applicable to entities operating within NHS-affiliated premises.

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

Where consent is the appropriate lawful basis, for example in connection with opt-in marketing communications or the use of non-essential cookies on digital properties maintained by Media Activation Ltd, we 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 Vistavue GP screen network;
- Generating post-campaign performance reports and audience insight analysis for advertising clients;
- Managing contractual and commercial relationships with clients, agency partners, GP practice liaisons, and suppliers;
- Communicating with clients and partners regarding campaign status, scheduling, creative specifications, and financial administration;
- Onboarding and administering GP practice locations as screen network sites, including contact management and site performance tracking;
- Improving the planning tools, audience measurement methodologies, and campaign delivery systems operated by Media Activation Ltd;
- Complying with applicable legal, NHS, 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 Vistavue GP Network Operator

We share campaign data, audience analytics, and scheduling information with the operator of the Vistavue GP network as necessary for the delivery of campaigns and the fulfilment of network booking obligations. The Vistavue GP operator is an independent data controller in respect of its own GP screen network operations and its contractual relationships with participating GP practices.

6.2 GP Practices and Primary Care Organisations

To the extent necessary for the administration of screen installations and campaign scheduling, we may share relevant operational information with GP practice managers or site contacts. Such sharing is limited to non-clinical, logistical, and administrative data only.

6.3 Advertising Clients

Post-campaign reports, audience performance data, and relevant operational information are shared with advertising clients on whose behalf campaigns are managed. No patient-identifiable data or data capable of identifying individual GP surgery attendees is disclosed to advertising clients. Where clients are data controllers for particular processing activities, such sharing is governed by the terms of the relevant data processing agreement.

6.4 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. All technology providers operating in connection with the Vistavue GP network are required to demonstrate compliance with NHS Data Security and Protection Toolkit standards where applicable to their data flows.

6.5 NHS Bodies and Regulatory Authorities

Where required by law, NHS frameworks, or binding regulatory direction, we will disclose relevant data to NHS England, integrated care boards, the ICO, the Care Quality Commission, the Medicines and Healthcare products Regulatory Agency, or other competent authorities. We will also comply with any direction of the Secretary of State for Health and Social Care or NHS Digital (now NHS England) in respect of data flows within NHS-affiliated premises.

6.6 Professional Advisers

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

6.7 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. 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.

Given the NHS-affiliated context of the Vistavue GP network, Media Activation Ltd takes particular care to ensure that any international transfers of data arising in connection with network operations are consistent with NHS data sovereignty principles and applicable NHS contractual frameworks. 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, NHS, 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;
- GP practice site contact and liaison records: for the duration of the network site agreement and 6 years thereafter, in accordance with the Limitation Act 1980;
- Client and agency contact records: for the duration of the business relationship and 6 years thereafter;
- 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, with particular regard to the sensitivity of the primary care environment in which the Vistavue GP network operates. Our security measures include:

- 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 on data protection obligations, with specific awareness-raising in respect of the heightened sensitivity of NHS and primary care data environments;
- Supplier due diligence, including assessment of NHS Data Security and Protection Toolkit compliance where applicable, imposed on all data processors engaged in connection with the Vistavue GP network;
- Business continuity and data recovery procedures aligned to NHS Business Continuity Management standards where applicable.

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. Where a breach involves data flows within NHS-affiliated premises, we will additionally notify the Vistavue GP network operator and, where appropriate, the relevant NHS body or Data Security and Protection lead.

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. We note that, for patients whose data is processed solely by their GP practice or NHS trust in connection with clinical care, requests for access to medical records and patient data should be directed to the relevant practice or NHS organisation, not to Media Activation Ltd.

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 establishment, 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.

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):

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 welcome the opportunity to address any concerns before you approach the ICO and invite you to contact us in the first instance using the contact details in Section 10.8 above. Where concerns relate to data processed within an NHS context, you may also raise matters with the relevant NHS body's Data Security and Protection lead or the Parliamentary and Health Service Ombudsman.

12. Cookies and Digital Tracking Technologies

To the extent that Media Activation Ltd operates digital properties in connection with Vistavue GP (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 available controls, is set out in our Cookie Policy, 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 advertising campaign management 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.

Media Activation Ltd recognises, however, that GP surgery waiting rooms are environments routinely attended by children and their parents or guardians. Accordingly, the following safeguards apply specifically to Vistavue GP network campaigns:

- No audience measurement data collected from Vistavue GP network locations is used to identify, profile, or target children as an audience segment;
- Advertising content placed on the Vistavue GP network is subject to the CAP Code provisions restricting advertising directed at or likely to be seen by children, and Media Activation Ltd will decline or require amendment of campaign creative that is inappropriate for a general GP surgery audience that may include children;
- No advertiser data or campaign targeting parameters relating to the Vistavue GP network may be used to infer the health status or medical attendance patterns of children.

14. NHS Context, Healthcare Advertising, and Regulatory Compliance

14.1 NHS Data Security and Protection

Where Media Activation Ltd's operations involve data flows within or in connection with NHS-affiliated premises, we acknowledge the relevance of the NHS Data Security and Protection Toolkit and the data security standards established by NHS England. We require all technology partners and data processors operating in connection with the Vistavue GP network to maintain data security standards consistent with NHS requirements applicable to their role and the data they handle.

14.2 General Medical Council and Professional Obligations

Media Activation Ltd is not itself subject to General Medical Council (GMC) regulation; however, we recognise that GP practices hosting Vistavue GP screens remain subject to GMC standards and obligations as regards the professional environment they provide to patients. Media Activation Ltd will not act in any manner that could cause a participating GP practice to breach its professional regulatory obligations, including obligations relating to patient confidentiality and the integrity of the clinical environment.

14.3 Healthcare Advertising Standards

All campaigns managed by Media Activation Ltd on the Vistavue GP network are required to comply with:

- The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code), including the Healthcare section;
- The Medicines and Healthcare products Regulatory Agency (MHRA) guidance on the advertising of medicines, including the prohibition on advertising prescription-only medicines to the general public;
- The Medicines Act 1968 and the Human Medicines Regulations 2012;
- The Prescription Medicines Code of Practice Authority (PMCPA) Code of Practice in respect of any pharmaceutical company advertising;
- NHS England guidance on commercial activity in primary care premises;
- Any conditions imposed by individual GP practices or primary care networks on the nature of advertising content displayed on their premises.

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 or that are inappropriate to a GP surgery environment.

14.4 Patient Dignity and Clinical Environment Integrity

Media Activation Ltd acknowledges that GP surgery waiting rooms are sensitive clinical environments in which patients may be anxious, unwell, or in receipt of difficult health news. Campaign content placed on the Vistavue GP network will be reviewed to ensure it is appropriate to this context, does not cause distress or alarm to patients, does not undermine the clinical authority of the practice, and does not conflict with NHS public health messaging. Campaigns considered incompatible with a primary care environment will be declined regardless of their regulatory compliance in other contexts.

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, NHS frameworks, or business operations. Material changes will be communicated to advertising clients and relevant stakeholders by email or through our client-facing systems.

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.

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;

- “DPIA” means a data protection impact assessment conducted pursuant to Article 35 of the UK GDPR;
- “ICO” means the Information Commissioner’s Office, the supervisory authority for data protection in the United Kingdom;
- “NHS” means the National Health Service of England, Wales, and/or Scotland as the context requires;
- “NHS Data Security and Protection Toolkit” means the online self-assessment tool published by NHS England by which organisations processing NHS patient data demonstrate compliance with applicable data security and protection standards;
- “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;
- “Vistavue GP” means the digital screen advertising network operated across GP surgeries, primary care centres, and NHS-affiliated healthcare facilities throughout the United Kingdom, in connection with which Media Activation Ltd provides campaign management services.

— *END OF PRIVACY POLICY* —

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