

## PRIVACY POLICY

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### 1. INTRODUCTION

1.1 SourceBio International Plc ("we" "us" or "our") is committed to protecting and respecting your privacy. This policy (together with our Terms of Use and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

1.2 For the purpose of the applicable data protection legislation, the data controller is SourceBio International Plc of 1 Orchard Place, Nottingham Business Park, Nottingham, NG8 6PX.

### 2. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following personal data about you:

#### **Personal Data you give us.**

You may provide us with personal data about you when using our Products or Services or when corresponding with us by phone, e-mail or otherwise. This includes personal data you provide by filling in forms on this website and other websites operated by us or a member of our group (our "Websites"). This includes information provided at the time of registering to use our Websites, completing any transactions through our Websites, subscribing to any service that we offer, posting

material or requesting further services. The personal data you give us may include items such as your name, address, e-mail address, phone number, payment information, employer and job role. For the provision of some services, we may also process sensitive classes of information that may include information relating to medical or sexual health.

We rely on 'contractual necessity' as the lawful ground for the processing of your personal in such cases. In some specific cases we can process data with your consent (e.g. where you have ticked a box to receive information).

### **Personal Data we collect about you**

Regarding the processing of some specific items of personal data that assist us to improve our Products and to provide our services, we rely on 'legitimate interests' as the lawful ground for processing. This includes automatically collecting and using the following information:

- we may also ask you for information when you report a problem with our Websites;
- if you contact us, we may keep a record of that correspondence;
- we may ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- details of transactions you carry out through our Websites and of the fulfilment of your orders; and
- details of your visits to our Websites including, but not limited to, IP address, operating system and browser type, traffic data, location data, weblogs and other communication data (whether this is required for our own billing purposes or otherwise) and the resources that you access; and
- information generated in the provision/supply of products and services to you.

## **3. WHERE WE STORE YOUR PERSONAL DATA**

3.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

3.2 Where data is transferred outside of the EEA, the transfer will be safeguarded via 'standard contractual clauses'.

3.3 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

3.4 Where we have given you (or where you have chosen) a username and password which enables you to access certain parts of our Websites, you are responsible for keeping this username and password confidential. We ask that you not to share your username and password with anyone.

## 4. USES MADE OF THE INFORMATION

4.1 We use information held about you in the following ways:

- to ensure that content from our Websites are presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to carry out obligations arising from any contracts entered into between you and us;
- to help us identify you and any accounts you hold with us;
- administration;
- statistical analysis;
- customer profiling and analysing your purchasing preferences;
- fraud prevention and detection
- to allow you to participate in interactive features of our service, when you choose to do so; and
- to notify you about changes to our Websites and to the products and services that we offer.

4.2 We may also use your data for marketing and publicity purposes or to provide you with information about goods and services which may be of interest to you, and we may contact you about these.

- If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.
- If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

- We will not sell your data to any third parties or share your information with third parties for marketing purposes.

## 5. DISCLOSURE OF YOUR INFORMATION

5.1 We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 1159 of the Companies Act 2006.

5.2 We may disclose your personal information to third parties:

- in order to enforce or apply our Website Terms of Use or any other applicable terms (for example, any terms and conditions of supply);
- in order to supply any products or services that you ask us to supply either through our Websites or otherwise (for example, we may subcontract the provision of certain services which may necessitate the disclosure of your personal information);
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if SourceBio International, or any member of our group, is (or substantially all of its assets are) acquired by a third party, in which case personal data held by it about its customers may be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of SourceBio International, any member of our group, our customers, or others.

5.3 Disclosure may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 6. RETENTION OF YOUR PERSONAL DATA

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

Retention periods are determined by the type of data and relevant regulatory/legal requirements. These retention periods are documented in the SourceBio International Plc Information Asset Register.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

The security of your personal data is important to us. We comply with accepted industry standards to protect the personal data submitted to us. We use strict procedures and advanced security features to try to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of a Product, you are responsible for keeping this password confidential. You are not permitted to share a password with anyone.

## 7. YOUR RIGHTS

7.1 You have the following rights in relation to the handling of your personal data:

- You have the right to access personal data held about you
- You have the right to have inaccuracies corrected for personal data held about you
- You have the right to have personal data held about you erased, where allowed by law
- You have the right to object to direct marketing being conducted based upon personal data held about you
- You have the right to restrict the processing for personal data held about you, including automated decision-making
- You have the right to data portability for personal data held about you

You can exercise any of your rights outlined above by contacting us at [data.protection@sourcebiointernational.com](mailto:data.protection@sourcebiointernational.com). For questions on clinical information governance, please contact the Caldicott Guardian ([Caldicott.Guardian@sourcebiointernational.com](mailto:Caldicott.Guardian@sourcebiointernational.com)). Within one month of receiving a request made under these rights, we will action the request. Where we receive a large number of requests, or receive especially complex requests, this may be extended by a maximum of two further months. If we fail to meet these deadlines or if you feel your rights have not been adequately respected, you may complain to the Supervisory Authority and/or seek a judicial remedy.

7.2 Our Websites may, from time to time, contain links to and from the websites of advertisers, affiliates and relevant third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 8. INFORMATION ABOUT SOMEBODY ELSE

8.1 If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his or her personal data;
- receive on his/her behalf any data protection notices;
- give consent to the transfer of his/her personal data abroad; and

## 9. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## 10. CONTACT

Questions, comments or requests regarding this Privacy Policy are welcomed and should be addressed to [data.protection@sourcebiointernational.com](mailto:data.protection@sourcebiointernational.com) or on : +44 (0)115 973 9012. Enquiries relating to clinical information governance can be addressed to the Caldicott Guardian ([caldicott.guardian@sourcebiointernational.com](mailto:caldicott.guardian@sourcebiointernational.com)).