

## PRIVACY NOTICE

### 1 Who we are

We are Carcinotech Ltd, a company incorporated in Scotland with registered number SC604026 and having our registered office address at Roslin Innovation Centre, Easter Bush Campus, Edinburgh, EH25 9RG.

### 2 How to contact us

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

- By post: Roslin Innovation Centre, Easter Bush Campus, Midlothian, EH25 9RG.
- By email: [info@carcinotech.co.uk](mailto:info@carcinotech.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 3 Privacy Information

We are committed to protecting your personal data and your privacy. This privacy notice aims to give you information on how we collect and process your personal data through your use of our website <https://www.carcinotech.co.uk/> or any other website registered in our name ("**Website**"), including any personal data that you may provide through our Website, where we have a contract in place with you (please note that separate terms and conditions may also be applicable here), and through your other communications with us.

It is important that you read this privacy notice when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This version of our privacy notice was last updated on December 2021.

### 4 To whom does this privacy notice apply?

This privacy notice applies to:

- all individuals who visit our Website;
- all individuals who are or were our "**individual customers**" where you are a sole trader, partner in a traditional or limited partnership or member of an unincorporated association;
- all individuals who are current or former employees, workers, directors, officers, job applicants or otherwise related personnel of our corporate customer (being a corporate entity such as a limited company or limited liability partnership) or individual customer ("**customer-related individuals**");
- all individuals who are our "**business contacts**" where you or your organisation supply goods or services to us, provide professional services, have expressed an interest in us or have any other business relationship with us (including where your organisation is a public authority, an industry body or regulatory authority or similar); or

- all individuals who are our "**shareholders**" and/or "**investors**".

This privacy notice does not apply to employees, workers or other staff of Carcinotech Ltd.

## 5 **Information about our Website**

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

## 6 **Cookies**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly.

## 7 **Children**

Our Website is not intended for children and we do not knowingly collect any personal data relating to children.

## 8 **About the personal data that we collect and process**

"**Personal data**", or personal information, means any information about an individual from which that person can be identified. It does not include data where an individual's identity has been removed ("**anonymous data**").

The table set out in SCHEDULE 1 summarises the personal data we collect and process, how we use it ("**our processing purposes**") and why we use it ("**the lawful bases of processing**").

We may also collect, use and share "**Aggregated Data**" such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate data to calculate the percentage of individuals accessing a specific feature of our Website. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

As part of our business we may generate genetic data from anonymised human samples. In the event such genetic data is deemed to be special category personal data, then our lawful basis for processing shall be in accordance with Schedule 1 of the Data Protection Act 2018.

## 9 **How is your personal data obtained?**

We use different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us your identity, contact, financial, transactional or similar personal data when you correspond with us by post, phone, e-mail or otherwise, including when you complete a form on our Website or otherwise contact us via our Website.

- **Direct interactions with business contacts, individual customers and customer-related individuals.** You may give us your identity, contact, financial, transactional and other business related personal data when you correspond with us, including when:
  - you or your organisation negotiate and/or enter into a contract with us; or
  - you or your organisation provide services or products to us or your or your organisation receives services or products from us; or
  - you provide us with your business card.
- **Direct interactions with our investors and/or shareholders.** You may give us your identity, contact and other business related personal data in the process of investing in Carcinotech Ltd or where you communicate with us as a shareholder in Carcinotech Ltd.
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - where you are a business contact, your organisation or business may provide us with your identity and contact data.
  - where you are a customer-related individual, your organisation or business may provide us with your identity and contact data.
  - we may obtain identity and contact data from publicly available sources such as social media (such as LinkedIn or Twitter), Companies House or other organisations' websites.
  - we may obtain contact, financial and transaction data from providers of payment and credit card services.
  - we may obtain technical data (relating to the use of our Website) from analytics providers or search information providers.
  - where you are a member of an investment syndicate investing in Carcinotech Ltd the syndicate may provide your personal data to us as part of the transaction.

## 10 **Failure to provide personal data**

Where we need to collect personal data by law or under the terms of a contract we have with you (or are trying to enter into with you) and you fail to provide that data when requested, we may not be able to perform the contract. In this case, we may have to cancel a contract (but we will notify you if this is the case at the time).

## 11 **Marketing**

If you represent another business, we may provide you with direct marketing communications where we feel that this may be relevant to your business (provided that you have not opted out of such communications). When we use your personal data for such purposes, we do so on the basis that it is in our legitimate interests to pursue direct marketing, provided that it constitutes fair processing of your personal data to do so.

You can also opt-out or unsubscribe from all or some of these marketing communications at any time by contacting us at [info@carcinotech.co.uk](mailto:info@carcinotech.co.uk)

Where you opt out of receiving these marketing communications, this opt-out will not apply to personal data provided to us for any other purpose.

## 12 **With whom do we share your personal data?**

There may be circumstances in which we may also need to share your personal data with certain third parties (strictly on a confidential, business need-to-know basis). The third parties to which we may transfer your personal data include:

- Your business or organisation, for the purpose of providing our services or products to your business or organisation, or receiving products or services from your business or organisation.
- Our investors and/or shareholders.
- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, accountants, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Any relevant accreditation body or trade association.
- Any relevant regulatory authority or law enforcement agency, including HM Revenue & Customs, courts or tribunals who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Any sharing of your personal data will only take place either where we are legally obliged to do so, where it is necessary for the performance of a contract with you or where it is in our legitimate interests to do so, including as follows:

- to maintain network and information security;
- to provide services or products to our corporate customers;
- to develop and improve our services or products in order to remain competitive;
- to establish, protect and defend our legal rights;
- to pursue our commercial objectives where this does not override your rights and freedoms as a data subject.

## 13 **International transfers**

We generally do not transfer your personal data out of the UK. However, whenever we are required to transfer your personal data out of the UK (for example where a third party supplier is located outside of the UK), we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards are implemented, including any of the following:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.
- You have provided your explicit consent to the transfer of your personal data outside of the UK.
- The transfer is necessary for the purposes of performing a contract between us and you (the data subject).

#### 14 **Automated decision making and profiling**

We do not use automated decision-making (including profiling) to make any decisions which would produce a legal effect or similarly significantly affect a data subject.

#### 15 **How long do we retain your personal data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Personal data relating to Website users and business contacts will generally not be retained for longer than 12 months unless such data is relevant to ongoing services. Personal data relating to individual customers and customer-related individuals will generally not be retained for longer than 7 years after conclusion of the relevant services unless such data is relevant to any legal, accounting or reporting requirements. Please contact us at [info@carcinotech.co.uk](mailto:info@carcinotech.co.uk) for further details about our retention periods.

#### 16 **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of a breach where we are legally required to do so.

#### 17 **Your rights**

Your personal data is protected by legal rights, which include your rights to:

- **Request access to your personal data** (commonly known as a "**data subject access request**"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, following your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party (data portability).** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights, please contact us at [info@carcinotech.co.uk](mailto:info@carcinotech.co.uk).

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You also have the right to complain to the Information Commissioner's Office, which regulates the processing of personal data, about how we are processing your personal data.

## SCHEDULE 1

Personal data will be processed by us where you consent to the processing or where that processing is necessary for 1) the performance of a contract with you; or 2) compliance with a legal obligation to which we are subject; or 3) the purposes of our legitimate interests (or those of a third party).

**Legitimate interests** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [info@carcinotech.co.uk](mailto:info@carcinotech.co.uk) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
<b>Website users</b> <ul style="list-style-type: none"> <li>any visitor to our Website</li> </ul>	Technical data (including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website)  Usage data (including information about your visit and how you use our Website)	To improve the user experience and administer the functionality of our Website  To respond to general and specific enquiries	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to maintain network security and Website relevance for visitors to our Website)</li> <li>Necessary to comply with a legal obligation</li> </ul>
<b>Individual customers</b> <ul style="list-style-type: none"> <li>any sole trader, partner in a traditional or limited partnership, member of an unincorporated association or</li> </ul>	Identity data (including full name and title)  Contact data (including business and home address,	To process and deliver services/products to you and/or your organisation including:  (a) providing information about our services/products on request;	<ul style="list-style-type: none"> <li>Performance of a contract with you</li> <li>Necessary for our legitimate interests (to respond to your correspondence with us, to keep our records up to date, to recover debts due to us and to</li> </ul>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
<p>other individual who is or was a customer</p>	<p>email address and telephone numbers)</p> <p>Employment data (including job title and role)</p> <p>Transaction data (including information obtained by providing services/products to you, details about services/products provided by us to you, details of payments to and from you, and other details of our interactions including correspondence and conversations)</p> <p>Financial data (including bank account details and payment details)</p> <p>Marketing and communications data (including your preferences in receiving marketing from us and your communication preferences)</p>	<p>(b) carrying out our business;</p> <p>(c) managing payments, fees and charges;</p> <p>(d) collecting and recovering money owed to us;</p> <p>(e) dealing with any customer complaints and receiving feedback; and</p> <p>(f) corresponding with you in connection with our business.</p> <p>To manage our relationship with you</p> <p>To notify you about changes to our terms and conditions or privacy notice</p>	<p>manage customer relationships)</p> <ul style="list-style-type: none"> <li>Necessary to comply with a legal obligation</li> </ul>
<p><b>Customer-related individuals</b></p> <ul style="list-style-type: none"> <li>any actual, former or prospective employees, workers, consultants, job applicants and other personnel of a customer;</li> <li>any other individual related to a customer who is relevant to any services/products provided by us to such customer</li> </ul>	<p>Identity data (including full name and title)</p> <p>Contact data (including business and home address, email address and telephone numbers)</p> <p>Employment data (including job title and role)</p> <p>Transaction data (including information obtained by providing services/products to our customer, and other details of our interactions including correspondence and conversations)</p> <p>Financial data</p>	<p>To process and deliver services/products to your organisation including:</p> <p>(a) providing information about our services/products on request;</p> <p>(b) carrying out our business;</p> <p>(c) managing payments, fees and charges;</p> <p>(d) collecting and recovering money owed to us;</p> <p>(e) dealing with any customer complaints and receiving feedback; and</p> <p>(f) corresponding with you in connection with</p>	<ul style="list-style-type: none"> <li>Necessary for us to perform contracts with our corporate customers</li> <li>Necessary for our legitimate interests (to respond to your correspondence with us, to keep our records up to date, to manage customer relationships and to recover debts due to us)</li> <li>Necessary to comply with a legal obligation</li> </ul>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
	<p>(including bank account details and payment details)</p> <p>Marketing and communications data (including your preferences in receiving marketing from us and your communication preferences)</p>	our business.	
<p><b>Business Contacts</b></p> <p>actual, former or prospective business contacts, including:</p> <ul style="list-style-type: none"> <li>• staff or other contacts at our third party suppliers (including professional advisors)</li> <li>• individuals or representatives of organisations who have expressed an interest in our business, and</li> <li>• anyone else with whom we have contact in a business context</li> </ul>	<p>Identity data (including full name and title)</p> <p>Contact data (including business address, email address and telephone numbers)</p> <p>Employment (including job title and role, employer)</p> <p>Transaction data (including details about products and services provided by you (or your organisation) to us, details of payments to and from you (or your organisation) and other details of our interactions including correspondence and conversations)</p> <p>Marketing and communications data (including your preferences in receiving marketing from us and your communication preferences)</p>	<p>To manage our business relationships with suppliers and sub-contractors, professional advisors, regulatory authorities and others, which will include:</p> <p>(a) seeking or maintaining business relationships with various organisations, including accreditation and regulatory authorities;</p> <p>(b) assessing the suitability of any existing or potential supplier or other business relationship;</p> <p>(c) negotiating and entering into appropriate contracts for the supply of products or services to us, carrying out any obligations under such contracts (including obligations of payment) and if necessary enforcing any such contracts;</p> <p>(d) undertaking on-going monitoring and management of our relationship with suppliers and other professional and business contacts;</p> <p>(e) interacting with other organisations or persons (including partners, other advisers or sub-contractors) in the course of providing services/products to our customers; and</p>	<ul style="list-style-type: none"> <li>• Performance of a contract with you (where relevant)</li> <li>• Necessary for our legitimate interests (to manage third party relationships, to seek supply arrangements appropriate for our business, to run our business efficiently and profitably, to enhance, modify and improve our services, and to pursue our commercial objectives where this does not override your rights and freedoms as a data subject)</li> <li>• Necessary to comply with a legal obligation</li> </ul>

Whose personal data?	What personal data do we collect?	How do we use your personal data?	Why do we use your personal data?
		(f) investigating any complaints or enquiries.	
<b>Investors and shareholders</b> <ul style="list-style-type: none"> <li>• actual or prospective investors and/or shareholders</li> </ul>	Identity data (including full name and title)  Contact data (including business address, email address and telephone numbers)	To communicate with you with regard to matters relating to an investment in Carcinotech Ltd  To provide you with information about Carcinotech Ltd where we have given an undertaking to provide you with such information	<ul style="list-style-type: none"> <li>• Performance of a contract with you (where relevant)</li> <li>• Necessary for our legitimate interests (to manage our relationship with our investors and/or shareholders)</li> <li>• Necessary to comply with a legal obligation</li> </ul>

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [info@carcinotech.co.uk](mailto:info@carcinotech.co.uk)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.