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Introduction

Our Privacy Policy was last updated on 2nd December 2019.

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use our services and tells you about your privacy rights and how the law protects you.

Life Science Group Ltd (LSG) is committed to a policy of protecting the rights and privacy of individuals, in accordance with the UK General Data Protection Regulation (UKGDPR). UKGDPR contains provisions that the organisation will need to be aware of as data controllers, including provisions intended to enhance the protection of personal data.

Types of Data Collected

LSG needs to process certain information about its staff, customers, suppliers, and other individuals with whom it has a relationship for various purposes such as, but not limited to:

- The recruitment and payment of staff.
- The day to day purchasing and sales of goods
- The making or receiving of payments as part of day-to-day trading
- To contact you about a submission or request for information you have made.
- In relation to any correspondence, we receive from you or any comment or complaint you make about our products or services.
- Complying with legal obligations and government including local government.

To comply with various legal obligations, including the obligations imposed on it by UKGDPR, LSG must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

Tracking Technologies and Cookies

We use cookies and similar tracking technologies to track the activity of our service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse our service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on your device. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some parts of our service. Unless you have adjusted Your browser setting so that it will refuse cookies, our service may use cookies.
- **Web Beacons.** Certain sections of our service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the LSG, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser.

LSG uses both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: LSG

Purpose: These cookies are essential to provide you with services available through the website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

- **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: LSG

Purpose: These cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: LSG

Purpose: These cookies allow us to remember choices you make when you use the website, such as remembering your login details or language preference. The purpose of these cookies is to provide you with a more personal experience and to avoid You having to re-enter your preferences every time you use the website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These cookies are used to track information about traffic to the website and how users use the website. The information gathered via these cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the website. We may also use these cookies to test new pages, features, or new functionality of the website to see how our users react to them.

For more information about the cookies we use, and your choices regarding cookies, please visit our Cookies Policy (G-02-08), or the cookies section of our Privacy Policy (G-02-09).

Compliance

All members of staff are responsible for ensuring that any personal information which they hold is kept securely and not disclosed to any unauthorised third parties.

LSG will ensure that all personal information is accessible only to those who have a valid reason for using it.

LSG will have in place appropriate security measures to protect information physically and electronically.

As a matter of best practice, other agencies and individuals working with LSG and who have access to personal information, will be expected to read and comply with this policy. It is expected that departments who are responsible

for dealing with external bodies will take the responsibility for ensuring that such bodies sign a contract which among other things will include an agreement to abide by this policy.

Consent as a basis for processing information although not always necessary is the best way to ensure that information is collected and processed in an open and transparent manner. Consent is especially important when LSG is processing any sensitive information, as defined by the legislation.

LSG understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement. LSG also confirms consent cannot be inferred from the non-response to a communication.

This policy will be updated as necessary to reflect best practice in information management, security, and control and to ensure compliance with any changes or amendments to the UKGDPR and other relevant legislation.

This policy applies to all staff of LSG. Any breach of this policy or of the Regulation itself will be considered an offence and the Company's disciplinary procedures may be invoked.

Responsibility

LSG will be the 'data controller' under the terms of the legislation. This means it is ultimately responsible for controlling the use and processing of personal data. LSG has appointed a Data Protection Officer (DPO) who is available to address any concerns regarding the data held by LSG and how it is processed, held, and used.

The Senior Management Team is responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy and for developing and encouraging good information handling within the company.

The Senior Management Team is also responsible for ensuring that the Company's policy is kept up to date.

Compliance with the legislation is the personal responsibility of all staff at LSG who process personal information.

Individuals who provide personal data to LSG are responsible for ensuring that the information is accurate and up to date.

Data Protection Principles

To comply with its obligations, LSG undertakes to adhere to the eight principles:

1) Process personal data fairly and lawfully (the right to be informed)

LSG will make all reasonable efforts to ensure that individuals who are the focus of personal Identifying information (PII) are informed of the identity of the data controller, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

LSG will ensure that the data is adequate, relevant, and not excessive in relation to the purpose for which it is processed. LSG will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained.

LSG will process the data for the specific and lawful purpose for which it was collected and not further process the data in a manner incompatible with this purpose.

LSG will ensure that the reason for which it collected the data originally is the only reason for which it processes that data unless the individual consents to any additional processing before it takes place.

LSG undertakes not to disclose personal data to unauthorised third parties. Legitimate disclosures may occur in the following instances:

- Where the individual has given their consent to the disclosure.
- The disclosure is required for the performance of a contract. There are other instances when the legislation permits disclosure without the consent of the individual.

2) Subject Access Rights (SARs) (the right of access)

Individuals have a right to access any personal data relating to them which is held by LSG.

We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files. Any individual wishing to exercise this right should apply in writing to the Data Protection Officer.

Any member of staff receiving a SAR should forward this to the Data Protection Officer.

To ensure security we require you to prove your identity with 2 pieces of approved identification before any SARs request can be released.

3) Keep personal data accurate (the right to rectification)

It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and everyone should notify LSG if a change in circumstances mean that the data needs to be updated.

It is the responsibility of LSG to ensure that any notification regarding the change is noted and acted on.

4) Only keep personal data for as long as is necessary (the right to erasure)

LSG undertakes not to retain personal data for longer than is necessary to ensure compliance with GDPR legislation and other statutory requirements. This means LSG will undertake a periodic review of the information held and implement a purge process as required. LSG will dispose of any personal data in a way that protects the rights and privacy of the individual concerned.

5) Restrict the process of personal information. Individuals have the right to prevent processing of information while that information is subject to corrective action

At any time, a person can request to know what information is stored and request action to rectify, block, erase or destroy inaccurate information while that process is underway

6) Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

LSG will not transfer data to such territories without the explicit consent of the individual. This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the EEA - so LSG will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If LSG collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

7) The right to object allows an individual to prevent processing for purposes of:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).

- direct marketing (including profiling).
- processing for purposes of scientific/historical research and statistics.

8) Rights in relation to automated decision making and profiling

- automated individual decision-making (making a decision solely by automated means without any human involvement)
- profiling (automated processing of personal data to evaluate certain things about an individual). Incident Response UKGDPR introduces a duty to report certain types of personal data breach to the relevant supervisory authority.

Where feasible LSG will do this within 72 hours of becoming aware of the breach. If the breach is likely to result in a high risk of adversely affecting individuals’ rights and freedoms, LSG will also inform those individuals without undue delay.

For help or advice on any data protection or freedom of information issues, please do not hesitate to contact:

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Document history

Created / reviewed	Version	Main changes	Responsible
24 Oct 2022	01	To first official issue.	Andrew Littlewood