

## Privacy Policy

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## 1.0 PURPOSE AND SCOPE

This Privacy Policy details the data collection, processing and privacy measures operated by IGENOMIX UK, as required by the applicable privacy laws.

## 2.0 ROLES AND RESPONSIBILITIES

It is the responsibility of the management at IGENOMIX UK to control this document.

## 3.0 REFERENCES AND RELATED DOCUMENTS

UK\_EX\_013\_V2016\_REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ('GDPR')

UK\_EX\_003\_V5.0\_RCPATH The retention and storage of pathological records and specimens (5th edition)

UK\_M\_P\_006\_Management of Data and Information

## 4.0 DEFINITIONS

**Personal data ('data')** – *'any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person'*

*(GDPR, Article 4(1))*

**Special category data** – *'personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation'*

*(GDPR, Article 9(1))*

**GDPR** – The General Data Protection Regulation (GDPR) (EU) 2016/679 – *EU privacy legislation*

**IGENOMIX S.L.** – The headquarters of IGENOMIX international, based in Valencia, Spain.

## 5.0 POLICY

### 5.1 DATA CONTROLLER INFORMATION

<b><u>Controller</u></b>	<b>IGENOMIX UK</b> Igenomix UK Ltd Surrey Technology Centre 40 Occam Road Guildford, Surrey GU2 7YG	
	<b><u>Additional Controller</u></b>	IGENOMIX S.L.
	<b><u>IGENOMIX SL Representative</u></b>	<a href="mailto:privacy@igenomix.com">privacy@igenomix.com</a>
	<i>IGENOMIX UK receives guidance from IGENOMIX SL on data collection for testing completed by IGENOMIX SL ('Outsourced' tests)</i>	
<b><u>Our Representative</u></b>	<a href="mailto:info.uk@igenomix.com">info.uk@igenomix.com</a>	
<b><u>Data Protection Officer</u></b>	Roy Pascal Naja	
<b><u>Additional Processors</u></b>	<ul style="list-style-type: none"> <li>- Clinics to whom IGENOMIX UK provide their services</li> <li>- HubSpot, Inc. (CRM platform); in adherence to the EU-US Privacy Shield agreement</li> </ul>	

### 5.2 WHAT DATA WE COLLECT & PROCESS

The personal information that we collect and process will differ depending on our relationship with you:

#### 5.2.1 For Patients

If you undertake testing through IGENOMIX UK then the data that we collect will include your basic information such as name and contact details, and sensitive (so called 'special category') information, including ethnicity, health, and fertility information. Only data that is necessary for the completion of your requested test will be collected; data will be used for only the purposes of the requested testing. A full list of all of the information that IGENOMIX UK may collect from patients is given below. Please note that, for many tests, only a subset of this list will be collected.

Full name	Previous fertility information/treatments
Ethnic group	Weight & height
Data of Birth	Contact details (email, phone, address)
Gender	Pregnancy information

Current fertility treatments	Recent antibiotic treatments
Fertility cycle information	Family/personal history of genetic conditions
Any blood borne transmitted disease(s)	Family history/personal genetic conditions

### 5.2.2 For Providers

IGENOMIX UK will collect and process the information that you provide to facilitate the professional relationship between you (the provider) and IGENOMIX UK. This information may include data about your employees, about whom IGENOMIX UK will collect and process only the following data:

Full name	Employer
Position in company/job title	Work contact details

## 5.3 HOW WE COLLECT DATA

### 5.3.1 For Patients

We collect the data required to perform any requested services either directly from you (the patient) or through your clinic, who act as a processor for us in collecting your data. We do not collect data from any other parties.

### 5.3.2 For Providers

The only employee data that we collect is that provided by you (the provider), either when we enter into a commercial arrangement with you, or in the course of our commercial communications.

## 5.4 OUR LAWFUL BASES FOR PROCESSING DATA

### 5.4.1 For Patients

We (and our processors) will only collect and process your data with your explicit, informed consent to do so.

### 5.4.2 For Providers

We collect and process your employees' basic information in the pursuit of the legitimate interests of you, the provider; specifically, to enable us to offer you and your patients our services.

## 5.5 YOUR RIGHTS

A number of rights are granted to you, as an individual, by EU legislation:

Rights	Description
Access	You have a right to get access to the personal information we hold about you.
Rectification	You have a right to rectification of inaccurate personal information and to update incomplete personal information.
Erase	You have a right to request that we delete your personal information.
Restriction	You have a right to request us to restrict the processing of your personal information.
Portability	You have a right to data portability.
Objection	You have a right to object to the processing of your personal information.
Related to automated decision making	You have a series of rights pertaining to the use of automated decision making.  <b>IGENOMIX UK does not undertake any automated decision making.</b>

You, as an individual, may exercise any of your rights by contacting IGENOMIX UK either:

- In writing, attaching a copy of a nationally recognised identification document, addressed to Igenomix UK Ltd, Surrey Technology Centre, 40 Occam Road, Guildford, Surrey, GU2 7YG; or
- By e-mail, attaching a scan or picture of a nationally recognised identification document, to [info.uk@igenomix.com](mailto:info.uk@igenomix.com)

## 5.6 SHARING YOUR INFORMATION

### 5.6.1 For Patients

IGENOMIX UK does not share your information with any third parties, **except:**

- IGENOMIX S.L., only when necessary for the involvement of IGENOMIX S.L. in relation to your requested testing.
- HubSpot Inc. (CRM platform), if you complete the *contact form* on the IGENOMIX UK website. Only your basic information (name and contact details) are stored in this manner. HubSpot Inc. does not share your data with any other parties.

### **5.6.2 For Providers:**

IGENOMIX UK does not share your information with any third parties, **except:**

- HubSpot Inc. (CRM platform). HubSpot Inc. does not share your data with any other parties.
- With suppliers necessary to provide the service that you request (for example: providing the name of a member of staff for a courier delivery).

## **5.7 MARKETING & OPPORTUNITY COMMUNICATIONS**

### **5.7.1 For Patients**

We will only send marketing and opportunity information to patients who have opted-in to this communication.

### **5.7.2 For Providers**

Unless you have told us not to, we will send you marketing information relating to products, opportunities, and services that we believe may be of interest and relevant to you. If you want to opt-out of these marketing communications then you may do so by contacting us on [info.uk@igenomix.com](mailto:info.uk@igenomix.com), or by using the 'email preferences' option at the bottom of these emails.

## **5.8 HOW LONG WE KEEP YOUR INFORMATION**

### **5.8.1 For Patients**

Under guidance from the Royal College of Pathology (The retention and storage of pathological records and specimens (5th edition)), IGENOMIX UK will retain your data for 30 years.

### **5.8.2 For Providers**

We will keep data on you and your employees until you request that we erase this information.

## **5.9 SECURITY**

IGENOMIX UK is committed to ensuring that your information is secure with us. We use many tools, safeguards, and security protocols to ensure that your data remains confidential and accurate detailed in our Management of Data and Information policy (UK\_M\_P\_006\_Management of Data and Information) and we may record calls and emails to protect you and us.