

## Privacy Policy

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# 1 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 ROLES AND RESPONSIBILITIES

It is the responsibility of the management at IGENOMIX UK to control this document and ensure that staff are aware of and compliant with this document.

## 3 REFERENCES AND RELATED DOCUMENTS

The Data Protection Act (2018)

The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019

The Royal College of Pathology - The retention and storage of pathological records and specimens (5th edition)

[UK\\_EX\\_013\\_REGULATION \(EU\) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#)

## 4 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

DPA 2018 - The Data Protection Act (2018)

The UK GDPR – a generic term to include the regime of data protection regulations that will be established in legislation effective from the end of the UK EU exit transition period (i.e. post 31 December 2020). This primarily includes the Data Protection Act (2018) and associated amendments to incorporate EU GDPR standards into UK law.

Relevant Legislation – the UK GDPR

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

## 5 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:privacy@igenomix.com">privacy@igenomix.com</a>	
<b><u>Data Protection Officer</u></b>	Javier Cagigas Benlloch	
<b><u>Additional Processors</u></b>	- Salesforce.com (CRM platform), in adherence to the EU-US Privacy Shield agreement	

## 6 POLICY – FOR WEBSITE USERS & EMPLOYMENT ENQUIRIES

### 6.1 COLLECTING AND PROCESSING YOUR PERSONALLY IDENTIFIABLE INFORMATION

#### 6.1.1 PURPOSE

During your visit to our website, we automatically anonymize and store the name of your Internet service provider, the website from which you are visiting us, the pages of our website you are visiting, the websites that you go on to visit from our website, as well as the date and duration of your visit. We can evaluate this information anonymously. Other personally identifiable information is then collected and stored only if you give us express permission to do so. Our data protection notice applies only when you are visiting our website and does not apply to your activities on social networking websites or those of other providers that you access via links on our website. Please refer to the websites of these providers for information about their data protection policies.

We exclude, as far as legally possible, the liability for damages caused by the usage of linked websites. We store other personally identifiable information only if you provide this information to us in the context of a contact form, newsletter, employment, or an email, in these cases only insofar as we are permitted to do so on the basis of consent given by you or under Relevant Legislation. There is no legal or contractual obligation for you to provide your personally identifiable information. However, certain functions on our website may depend on the transfer of personally identifiable information. If you do not transfer personally identifiable information in these cases, these functions may be restricted or unavailable. Your personally identifiable information will be used only for the purpose for which you have voluntarily provided this information to us (Contact, Newsletter and Employment) and to protect our IT systems against attacks and other unlawful activity. Should you transfer other personally identifiable information, for example, in the context of an email, we will use this information for

answer the question, to the extent necessary in each case. Our employees and service providers are contractually bound to the strictest confidentiality.

## 6.2 DURATION OF DATA STORAGE

The time for which we will keep your data will depend on the purposes for which we process them, as explained below:

- **Contact/Email:** We will process your data for the time necessary to meet your request or application. We will process your data until you request that we cancel or limit the processing of your personal data.
- **Employment enquiries:** We will process your data for one year.
- **Newsletter:** We will process your data till you request that we cancel or limit the processing of your personal data.
- **Satisfaction Survey:** We will process your data in anonymous\* form and solely for purpose of the processing concerned.

\* Anonymised data are not subject to the Relevant Legislation, for the Igenomix Group your privacy is important and therefore we want to be as transparent as possible with our users.

## 6.3 LAWFUL BASES FOR PROCESSING

The legal bases by which we are permitted to process your personal data also depends on the purpose for which we process them, as explained below:

- **Contact/Email:** We consider that we have legitimate interest in answering the requests or consultations raised by you through the existing different contact channels. We understand that the processing of these data is also beneficial to you, as it enables us to assist you and answer your queries. In addition, by accepting our privacy policy you give us the consent to process your personal data.
- **Employment enquiries:** We consider that we have your consent for processing your data from the moment you send us your curriculum vitae. In addition, by accepting our privacy policy you give us the consent to process your personal data.
- **Newsletter:** We consider that we have your consent for processing your data from the moment you accept our newsletter. In addition, by accepting our privacy policy you give us the consent to process your personal data.
- **Satisfaction Survey:** We consider that we have your consent for processing your data from the moment you accept our privacy policy and answer the satisfaction survey. We understand that the processing of these data is also beneficial to you that it enables us to assist you adequately and improve our service.

## 6.4 DATA SHARING AND YOUR RIGHTS

We do not share your information with third parties except with the providers that need access to provide the contracted services. We only work with service providers that are bound by the strongest legal requirements for data protection.

A number of rights are granted to you, as an individual, by the Relevant 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.
Erasure	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	<p>You have a series of rights pertaining to the use of automated decision making.</p> <p><b>IGENOMIX UK does not undertake any automated decision making.</b></p>

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) and [privacy@igenomix.com](mailto:privacy@igenomix.com)

# 7 POLICY – FOR PATIENTS AND PROVIDERS

## 7.1 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:privacy@igenomix.com">privacy@igenomix.com</a>	
<b><u>Data Protection Officer</u></b>	Javier Cagigas Benlloch	
<b><u>Additional Processors</u></b>	- Salesforce.com (CRM platform), in adherence to the EU-US Privacy Shield agreement	

When you provide data to us through a third party – e.g. through a fertility clinic – then you also have a data protection relationship with that third party that is not included in the scope of this Privacy Policy.

## 7.2 WHAT DATA WE COLLECT & PROCESS

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

### 7.2.1 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
Date 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



### 7.2.2 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

## 7.3 HOW WE COLLECT DATA

### 7.3.1 FOR PATIENTS

We collect the data required to perform any requested services either directly from you (the patient) or through your clinic. We do not collect data from any other parties.

### 7.3.2 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.

## 7.4 OUR LAWFUL BASES FOR PROCESSING DATA

### 7.4.1 FOR PATIENTS

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

You may withdraw your consent at any time 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)

### 7.4.2 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.

## 7.5 YOUR RIGHTS

A number of rights are granted to you, as an individual, by the Relevant 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.
Erasure	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) and [privacy@igenomix.com](mailto:privacy@igenomix.com).

## 7.6 SHARING YOUR INFORMATION

### 7.6.1 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
- Salesforce.com (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. Salesforce.com does not share your data with any other parties.

### 7.6.2 FOR PROVIDERS:

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

- Salesforce.com (CRM platform). Salesforce.com 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)

## 7.7 MARKETING & OPPORTUNITY COMMUNICATIONS

### 7.7.1 FOR PATIENTS

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

### 7.7.2 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.

## 7.8 HOW LONG WE KEEP YOUR INFORMATION

### 7.8.1 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.

### 7.8.2 FOR PROVIDERS

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

## 7.9 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 and we may record calls and emails to protect you and us.

## 7.10 COMPLAINTS

### 7.10.1 DIRECT COMPLAINTS

You may complain directly to IGENOMIX UK by contacting us at [info.uk@igenomix.com](mailto:info.uk@igenomix.com) to request our complaints form.

### 7.10.2 COMPLAINTS TO SUPERVISORY BODIES

Should you feel it to be appropriate, you are able to lodge a complaint with the following supervisory bodies:

#### **Information Commissioner's Office**

[casework@ico.org.uk](mailto:casework@ico.org.uk)

0303 123 1113

#### **UKAS**

2 Pine Trees

Chertsey Lane

Staines-upon-Thames

TW18 3HR

[info@ukas.com](mailto:info@ukas.com)

01784 429000