

Our Data Protection Policy

This document explains how we use your personal data.

We are committed to safeguarding the privacy of our employees, customers, suppliers and potential candidates for job vacancies and other website visitors. This policy explains how we handle your personal data.

1. How we use your personal data

1.1 This section provides you with details about:

- (a) what personal data we may process;
- (b) in the case of personal data that we did not obtain directly from you, where we obtained that data from, and what types of data we have collected;
- (c) the purposes for which we may process your personal data; and
- (d) the legal grounds on which we process your data.
- (e) how you may seek access to or remedy of your personal data with us

1.2 **Profile data.** We may process information that you provide to us through our website ("**profile data**"). This profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details, employment history, immigration status, salary, curriculum vitae, job preferences and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services.

We may also process your profile data in relation to job vacancies that you have applied for, generally processing any job applications, facilitating the recruitment process and furthering our relationship with you. The legal basis for this processing is our legitimate interests in finding an appropriate person for a particular role.

Where you have provided your consent for us to do so, we may consider you for opportunities that you did not specifically apply for but which we think might be a good fit for your skillset.

Where you have given us consent to process your information for the purposes detailed above, we will enter the profile data into our central recruitment database.

1.3 **Contact data.** We may collect your details, that you have made available, from third-party sources such as websites on which our vacancies may be advertised, or through recruitment agencies. This information may include your name, email address, telephone number, and curriculum vitae ("**contact data**"). We may do this where we identify that you are suitable for an available vacancy with us. We may use the contact data to contact you to ask whether you would like to be considered for an appropriate vacancy. Our use of the contact data in these circumstances is limited to making contact with you to determine whether you are interested in working for us and applying for a role. The legal basis for this processing is our legitimate interest as a business in finding an appropriate person for a particular role.

1.4 **Usage data.** We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our

analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services.

The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

- 1.5 **Enquiry data.** We may process information contained in any enquiry you submit to us regarding our services or any available vacancies or career opportunities ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you, or for discussing available vacancies or career opportunities with you.

The legal basis for this processing is consent.

- 1.6 **Correspondence data.** We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

- 1.7 **Other processing activities.** In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we ask you to do so, for example an employment reference

2. Providing your personal data to others

- 2.1 **To our Group companies.** We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries, including Invicro LLC and Konica Minolta, Inc) insofar as reasonably necessary for the purposes set out in this policy.
- 2.2 **Our insurers/professional advisers.** We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 2.3 **For administrative services or staff benefits.** We may disclose employee personal data to third parties such as those administering our payroll system or staff benefits (this will include the providers of pension schemes or private medical insurance, or organisations associated with the Cycle To Work scheme or administering childcare vouchers).
- 2.4 **Where we provide your personal data to any third party.** Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.
- 2.5 **To comply with legal obligations.** In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

3. Transfers of your personal data outside of the European Economic Area

- 3.1 Where your personal data is transferred outside of the EEA, we will ensure that either (a) The European Commission has made an "adequacy decision" with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. This may include our Holding Company Invicro LLC based in the USA, whose data processing activities accord with the Privacy Shield. In all cases, transfers outside of the EEA will be protected by appropriate safeguards.
- 3.2 You acknowledge that personal data that you submit for publication through our website or services may be publicly available, via the internet, around the World. We cannot prevent the use (or misuse) of such personal data by others.

4. Retaining and deleting personal data

- 4.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.2 Unless we contact you and obtain your consent for us to retain your personal data for a longer period, we will retain and delete your personal data as follows:
- (a) Profile Data will be retained for 6 months following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
 - (b) Contact Data will be retained for 6 months following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
 - (c) Usage Data will be retained for 6 months following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
 - (d) Enquiry Data will be retained for 6 months following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
 - (e) Correspondence Data will be retained for 6 months following the date of our last contact or dealing with you, at the end of which period it will be deleted from our systems.
- 4.3 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Amendments

- 5.1 We may update this policy from time to time by publishing a new version on our website.
- 5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 5.3 We may notify you of changes to this policy by email.

6. Your rights

- 6.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) your request not being found to be unfounded or excessive, in which case a charge may apply; and

- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 6.2 We may withhold personal information that you request to the extent permitted by law, or where it might involve another individual's personal data
- 6.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 6.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.
- 6.5 The rights you have under data protection law are:
- (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 6.6 **Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and to have access to the personal data and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.
- 6.7 **Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.
- 6.8 **Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.
- 6.9 **Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing,

but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 6.10 **Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.
- 6.11 **Your right to object to direct marketing.** You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.
- 6.12 **Your right to object for statistical purposes.** You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.
- 6.13 **Automated data processing.** To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.
- 6.14 **Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 6.15 **Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 6.16 **Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

7. **Cookie Policy**

For information about how we use Cookies please see our Cookie Policy at www.invicro.com

8. **Our details**

- 8.1 This website is owned and operated by our parent company Invicro LLC.
- 8.2 Imanova Limited is registered in England and Wales under registration number 07516277, and our registered office is at Burlington Danes Building Imperial College London, Hammersmith Hospital, Du Cane Road, London, United Kingdom, W12 0NN.
- 8.3 You can contact us:
- (a) by post, using the postal address given above;

- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

9. Data protection officer

Our data protection officer is Matthew Chernesky who can be contacted via email dpo@invicro.com

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