

## Privacy Notice

### Who we are

CellCentric Ltd is a clinical stage biotechnology company focused on the development of the novel drug CCS1477 for specific cancers.

Our registered address is: Chesterford Research Park, Little Chesterford, Cambridge, CB10 1XL.

CellCentric Ltd are registered with the Information Commissioners Office as a Data Controller under registration number **ZB041648**.

### Your Privacy

Your privacy matters to us. We are committed to the highest data privacy standards, confidentiality and compliance with UK & European data protection laws. Our Privacy Notice includes the following:

- what data we collect from you
- how and why we process it
- who we share it with and why

We adopt the six core principles of data protection, as required by UK / EU GDPR and Data Protection Act 2018:

1. **Lawfulness, fairness and transparency** - we process personal data lawfully, fairly and in a transparent manner in relation to you, the data subject.
2. **Purpose limitation** - we only collect personal data for a specific, explicit and legitimate purpose. We clearly state what this purpose is in this Privacy Notice, and we only collect data for as long as necessary to complete that purpose.
3. **Data minimisation** - we ensure that personal data we process is adequate, relevant and limited to what is necessary in relation to the processing purpose.
4. **Accuracy** - we take every reasonable step to update or remove data that is inaccurate or incomplete. You have the right to request that we erase or rectify erroneous data that relates to you, and we will complete this task as soon as possible but guarantee to do so within a month.
5. **Storage limitation** - we delete personal data when we no longer need it. Whilst the timescales in most cases aren't set, we outline our retention strategy within this Privacy Notice.
6. **Integrity and confidentiality** - we keep personal data safe and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### Collection of Personal Data for which we are responsible as a Data Controller

We collect the personal information of our business clients, prospective clients, research partners, consultants and other interested parties via disclosure directly from them. This might be via our website, e-mail, telephone, face to face engagement or through contractual agreements.

We also collect pseudonymised (coded) personal data of individuals who take part in clinical trials which we sponsor and the personal data of individuals involved in organising, conducting, monitoring and regulating those trials.

### **Categories and Type of Personal Data collected and processed as Data Controller**

In our engagement with individuals directly as part of our business and research interactions we may collect:

- Names
- Telephone number(s)
- Work email addresses
- Work addresses

In our activities as the Sponsor of clinical trials we may collect the following information on individuals taking part in trials:

- Trail subject identifiers (Codes)
- \*Ethnicity, Gender, Age, Weight, Height
- \*Health & Medical information
- \*Medical samples
- \*Medical study results & reactions

In our activities as the Sponsor of clinical trials we collect the following information on individuals organising, conducting, monitoring and regulating them:

- Names / Signatures
- Telephone number(s)
- Work email addresses
- Work addresses
- Qualifications and experience
- Financial disclosures
- Gender
- Professional roles

\* We treat all personal data as sensitive but acknowledge that we are processing special category data. We recognise our obligations in ensuring that special category data is given particular protection.

### **Reason for Data collection and processing activities.**

Contact information is captured to enable us to work with clients, partners, consultants and contractors efficiently.

Information collected on those individuals taking part in our clinical trials is done so to provide us with the information required to establish the effectiveness of our product, its safety and in meeting our legal obligations for the development of a new drug.

Information collected from those organising, conducting, monitoring and regulating our clinical trials is done so to ensure that we have the required information to meet the legal obligations for clinical trails and the marketing of medical products.

### **Sharing of Personal Data**

During our engagement with you for business, research or clinical trial activities, we may share your personal data with other organisations who are critical for these purposes. These organisations will be contracted as our Data Processors. Under the terms of the contracts with them, they will have provided sufficient guarantees that they will process your data only as

instructed by us and throughout their processing activities will ensure that data is protected using appropriate technical and organisation measures.

These organisations are usually located within the UK and the European Economic Area (EEA), however there may be occasions where they are located in other countries, who do not have the same regulatory data protection standards as the UK or EEA. In this situation we will ensure that the appropriate safeguards for the protection of your personal data are in place before allowing transfer to these countries.

A full list of processors is available from our Data Protection Officer.

### **Securing and Processing of your Personal Data**

The personal data that we process is stored within our own internal IT systems, Offices and those of contracted electronic storage providers.

We have assessed the risks of the processing and storage of your personal data, to ensure we have implemented appropriate technical and organisational measures to protect it.

In the unlikely event that we lose personal data, or a device on which personal data resides, or it is accessed by someone unauthorised, we have a duty to inform those individuals affected immediately. If the loss or unauthorised access of personal data has potential to cause harm or impact the data rights of individuals, we will also report this to the Information Commissioners Office, who are responsible for regulating data protection legislation in the UK. <https://ico.org.uk/>

### **Our legal basis for processing your personal data ?**

Depending on the processing activity, we rely on the following lawful basis for processing data under UK GDPR:

- Article 6(1)(a) consent
- Article 6(1)(b) contract
- Article 6(1)(c) legal obligation
- Article 6(1)(d) vital interests
- Article 6(1)(e) public task
- Article 6(1)(f) legitimate interests

Our processing activities in respect to business, research and clinical trial management will be done so on a contractual relationship with you.

We could also process your data under our legitimate interests in respect to the effective management of business operations and also in order to meet our legal requirements.

The processing of clinical trial subject data is done so in order to meet our legal requirements.

Where special category of data is processed, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(i) for reasons of public interest in the area of public health

### **How long do we keep personal data for?**

We process personal data for the shortest duration needed to conduct our business operations and manage the successful clinical trials of the drug we've developed.

We will retain some personal data following expiry of any contractual agreement, in order to meet legal requirements, such as Financial accounting.

Information collected for the purpose of and used to satisfy the legal requirements of conducting clinical trials and marketing new medical products, will be retained for a minimum of 25 Years.

### **Your rights in relation to personal data**

Under the UK & EU GDPR, you have rights to access and control your personal data. These rights include:

- access to personal information
- correction and deletion
- withdrawal of consent (if processing data on condition of consent)
- data portability
- restriction of processing and objection
- lodging a complaint with the appointed supervisory bodies

You can exercise your rights by emailing our Data Protection Officer on:

[CellCentricDPO@Clinicaldpo.com](mailto:CellCentricDPO@Clinicaldpo.com)

If you took a part in one of our clinical trials, please refer to your Patient Information Sheet which provided further details on your data rights and the preferred way in which you should exercise your rights.

If you are unhappy with anything we have done with your data, you have the right to complain to the Information Commissioners Office in the UK or the supervisory body appointed in your own country or both.

To make a complaint to the Information Commissioners Office use the link below or call their hotline on Tel No.: 0303 123 1113.

<https://ico.org.uk/concerns/>

### **Use of cookies and other technologies on our website**

Cookies are a small text file sent to your computer by the web page you visit and enables us to monitor the number of visitors to our site and the pages which were viewed.

We only utilise Google Analytics on our website which is a tracking cookie and have this set up so that your IP address is anonymised; which therefore means we are not able to identify you or your individual browsing history or preferences. All information collected is used in this anonymised format and the cookies on your computer will be deleted when you close your browser.

### **How to contact us?**

For all data protection matters or questions relating to how we manage your data, you can contact our Data Protection Officer via these means:

Data Protection Officer:	Clinical DPO
Phone Number:	0203 411 2848
Email:	<a href="mailto:CellCentricDPO@Clinicaldpo.com">CellCentricDPO@Clinicaldpo.com</a>

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