



## **Privacy Notice**

### **Who we are**

CellCentric Ltd is a clinical stage biotechnology company focused on the research, development and potential commercialisation of investigational medicinal products for the treatment of cancer, in accordance with applicable regulatory frameworks and the ICH-GCP guidelines.

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

We are registered with the UK Information Commissioner's Office as a Data Controller under registration number ZB041648.

For the purposes of applicable data protection laws, CellCentric Ltd acts as a data controller (or equivalent term under local law).

### **Scope of This Notice**

This Privacy Notice applies to personal data collected via our corporate website and general business interactions.

It does not apply to:

- Clinical trial participants (covered by Informed Consent Forms and Participant Information Sheets)
- Investigators, site staff, or clinical personnel (covered by separate privacy notices)
- Employees and job applicants (covered by internal privacy notices)

### **Your Privacy**

Your privacy matters to us. We are committed to the highest data privacy standards, Confidentiality, and compliance with UK, European and global data protection laws and regulations.

We also apply ICH-GCP principles, particularly with respect to confidentiality, controlled access to data and data integrity and accountability.

### **Categories of Personal Data we Collect**

We collect personal data directly from you, when you contact us, submit information via our website, or otherwise communicate with us. We may collect the following personal information from you:

- Name
- Business contact details (email, telephone number)
- Organisation, role, and professional information
- Any information you submit via forms or correspondence which may include special category data.

We may also collect the following information automatically through your use of our website:

- IP address (with anonymisation where feasible)
- Device and browser information
- Website usage data (pages visited, duration, referring URLs)

We do not intentionally collect special category (sensitive) personal data via our website.

We may obtain your personal data from third parties, such as:

- Publicly available sources (e.g. professional profiles or company websites)
- Service providers supporting our website or IT systems
- Business partners or organisations you represent

We take reasonable steps to ensure that such data has been collected and shared in accordance with applicable data protection laws.

### **Automated Decision-Making**

We do not use personal data to make decisions based solely on automated processing, including profiling, that produce legal or similarly significant effects on individuals.

### **Reason for Data collection and Legal Bases.**

<b>Purpose</b>	<b>Legal Basis (UK/EU GDPR)</b>
Responding to enquiries	Legitimate interests; Consent (where applicable)
Managing business relationships	Legitimate interests; Contract
Providing corporate and scientific information	Legitimate interests
Website administration and security	Legitimate interests; Legal Obligation
Compliance with regulatory requirements	Legal Obligation
Establishing, exercising, or defending legal claims	Legitimate interests; Legal Obligation (where applicable)

We assess each use of personal data based on legitimate interests to ensure it is necessary and proportionate, and that it does not unduly impact individuals' privacy.

Where required under local laws, processing is based on meaningful consent or other recognised legal grounds.

### **Sharing of Personal Data**

We may share your personal data with other organisations:

- IT and website service providers
- Professional advisors (legal, compliance, auditors)
- Group companies or partners supporting operations

These organisations will be contracted as our Data Processors. Under the terms of the contracts with them, they 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.

We do not sell or share personal data for commercial advertising purposes.

### **International Data Transfers**

We may transfer personal data to countries outside the UK/EEA, who do not provide the same level of data protection.

Where required, we implement safeguards such as:

- EU Standard Contractual Clauses (SCCs)
- UK International Data Transfer Agreements (IDTAs)
- Transfers to jurisdictions deemed adequate
- Additional technical and organisational safeguards

For a copy of the applicable transfer safeguards, including the EU SCCs and the UK IDTA please contact [CellCentricDPO@Clinicaldpo.com](mailto:CellCentricDPO@Clinicaldpo.com).

### **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 implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- Access controls
- Encryption and secure systems
- Policies and training
- Incident response procedures

These measures align with both GDPR requirements and ICH-GCP expectations for confidentiality and data integrity.

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

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, and operational requirements.

Retention periods are determined based on:

- The nature, sensitivity, and volume of the data
- The purposes for which it is processed
- Applicable legal and regulatory requirements
- Limitation periods for legal claims
- Regulatory expectations applicable to the life sciences sector

Typical Retention Periods:

- General enquiries / correspondence: up to 2–5 years after last interaction
- Business contact data: duration of the relationship plus up to 6 years (for legal and compliance purposes)
- Website analytics data: typically retained for 12–26 months (depending on configuration)

We may retain data for longer where required to:

- Comply with legal or regulatory obligations
- Establish, exercise, or defend legal claims
- Demonstrate compliance with applicable laws

Where personal data is no longer required, it will be securely deleted, anonymised, or aggregated.

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

Under the UK GDPR, you have the right to:

- Access your personal information
- Request correction
- Request erasure
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent (if processing data on condition of consent)

You also have the right to lodge a complaint with a supervisory authority.

Individuals in other jurisdictions may have similar rights under applicable local laws. We will honour such rights where required by applicable legislation.

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

We use cookies and similar technologies to:

- Ensure website functionality
- Analyse website usage
- Improve performance

We use Google Analytics on our website, configured to minimise data collection and anonymise IP addresses where possible.

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

For any data protection questions or to exercise your rights, please contact:

Data Protection Officer: Clinical DPO

Phone Number: 0203 411 2848

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

If you are not satisfied, you may lodge a complaint with a supervisory authority.

In the UK:

Information Commissioner's Office (ICO)

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

### **Changes to this Privacy Notice**

We may update this Privacy Notice from time to time to reflect changes in our practices, legal or regulatory requirements, or for other operational reasons.

We encourage you to review this Privacy Notice periodically to stay informed about how we process and protect your personal data.