



Alba Science Ltd
24 Broughton Street
Edinburgh
EH1 3RH
United Kingdom

Tel. 0131 557 2066
www.albascience.com

Alba Science – Privacy Policy for Customers

Company	Alba Science Ltd.
Policy No.	IMS-POL-007
Issued	23 May 2018
Version	1.0
Status	Issued



CONTENTS

1	OVERVIEW	3
2	INTRODUCTION	3
3	TYPES OF PERSONAL DATA WE COLLECT	3
4	SENSITIVE PERSONAL DATA	3
5	PURPOSES FOR PROCESSING PERSONAL DATA	4
6	LEGAL BASIS FOR PROCESSING PERSONAL DATA	4
7	WHO WE SHARE YOUR PERSONAL DATA WITH	4
8	WHERE WE KEEP YOUR PERSONAL DATA	5
9	TRANSFER OF PERSONAL DATA ABROAD	5
10	DATA RETENTION	5
11	YOUR RIGHTS	5
12	ISSUES AND COMPLAINTS	6
13	UPDATES TO THIS POLICY	6
14	CONTACTING US ABOUT THIS PRIVACY POLICY	6

1 OVERVIEW

Alba Science Ltd. (“we”, “us” or “alba”) is committed to data protection and data privacy. With the General Data Protection Regulation (GDPR) becoming enforceable from 25 May 2018, we have undertaken a GDPR readiness programme to review our entire business, the way we handle data and the way in which we use it to provide our services and manage business operations.

We hold personal data on all our employees to meet legal obligations and to perform vital internal functions. This policy details the personal data we may retain, process and share with third parties relating to vital business operations. We are committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard and secure personal data we hold.

2 INTRODUCTION

We have issued this notice to describe how we handle personal information that we hold about our customers (collectively referred to as "you").

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This notice sets out the personal data that we collect and process about you, the purposes of the processing and the rights that you have in connection with it.

3 TYPES OF PERSONAL DATA WE COLLECT

During your association with us and for a period afterwards, we may process personal data about our customers:

The types of personal information we may process include, but are not limited to:

- Identification data - such as your name and gender
- Contact details - such as your business address, telephone no. and email addresses
- Job details - such as job title/position, office location, line manager

4 SENSITIVE PERSONAL DATA

Sensitive personal data (‘special categories of personal data’ under the General Data Protection Regulation) includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, or information about your health/sex life.

Generally, we try not to collect or process any sensitive personal information about you, unless authorised by law or where necessary to comply with applicable laws. In some circumstances, we may need to collect some sensitive personal information for legitimate business-related purposes

Version	Date	Document	Page
1.0	23 May 2018	IMS-POL-007	3

5 PURPOSES FOR PROCESSING PERSONAL DATA

5.1 PROCUREMENT OF SERVICES

If you are Procuring a service from us, we will need to be able to contact you, usually by either telephone or email. We will use your personal contact details for this.

Your contact details will be stored in our Customer Management System, called Live Clinical. We use this system as a directory of all our customers and associated contacts.

5.2 LEGITIMATE BUSINESS PURPOSES

We may also collect and use personal information when it is necessary for other legitimate purposes, such as to help us conduct our business more effectively and to collect business-oriented metrics.

5.3 LEGAL PURPOSES

We may also use your personal data where we consider it necessary for complying with laws and regulations, including collecting and disclosing personal information as required by law.

6 LEGAL BASIS FOR PROCESSING PERSONAL DATA

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the way we collect it. We will normally collect personal data from you only where we need it to perform a contract with you (i.e. to manage the customer relationship), where we have your freely given consent to do so, or where the processing is in our legitimate interests and only where this interest is not overridden by your own interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

7 WHO WE SHARE YOUR PERSONAL DATA WITH

We take care to allow access to personal data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the data is used in a manner consistent with this notice and that the security and confidentiality of the data is maintained.

7.1 TRANSFERS TO THIRD-PARTY SERVICE PROVIDERS

In addition, we make certain personal data available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data protection and data privacy laws.

For example, some personal data will be available third-party companies who provide us with finance and accounting services.

Version	Date	Document	Page
1.0	23 May 2018	IMS-POL-007	4

7.2 TRANSFERS TO OTHER THIRD-PARTIES

We may also disclose personal data to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process
- In response to lawful requests by public authorities (including for national security or law enforcement purposes)
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of our employees or another person
- In connection with the sale, assignment or other transfer of all or part of our business; or
- With your freely given and explicit consent

8 WHERE WE KEEP YOUR PERSONAL DATA

All personal data is retained on Alba Science's own servers based in the United Kingdom. Some elements of your personal data are stored in systems provided by Microsoft for the facilitation of database services.

9 TRANSFER OF PERSONAL DATA ABROAD

We may need to transfer personal data to countries outside of the United Kingdom. When we export your personal data to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal data outside the European Economic Area (EEA), such as to the United States, we will implement an appropriate data export solution such as entering into contracts with the data importer that contain EU model clauses or taking other measures to provide an adequate level of data protection.

10 DATA RETENTION

Personal data will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes described in this notice or as otherwise required by law.

11 YOUR RIGHTS

You may exercise the rights available to you under data protection law as follows:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

Version	Date	Document	Page
1.0	23 May 2018	IMS-POL-007	5

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can read more about these rights at:

<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

12 ISSUES AND COMPLAINTS

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This notice was drafted with clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner’s Office in their capacity as the statutory body which oversees data protection law - www.ico.org.uk/concerns.

13 UPDATES TO THIS POLICY

This policy may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, the most recent version will be available on our website.

14 CONTACTING US ABOUT THIS PRIVACY POLICY

If you have any queries regarding this notice, please contact the Data Protection Officer at Alba Science using the details below:

Data Protection Officer
Alba Science Ltd,
24 Broughton Street
Edinburgh
EH1 3RH

Telephone: 0131 297 0000

Email: dataprotection@albascience.com

Version	Date	Document	Page
1.0	23 May 2018	IMS-POL-007	6

END OF DOCUMENT

Version	Date	Document	Page
1.0	23 May 2018	IMS-POL-007	7