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## Alba Science – Privacy Policy for Suppliers

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## 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 suppliers (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 suppliers:

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

## 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

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## **5 PURPOSES FOR PROCESSING PERSONAL DATA**

### **5.1 PROVISION OF SERVICES**

If you are providing a service to 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 Supplier Management System, called Live Clinical. We use this system as a directory of all our suppliers 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 supplier 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.

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## 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.

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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](http://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](mailto:dataprotection@albascience.com)

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