

## **NuVision Biotherapies Limited – Privacy Policy**

NuVision Biotherapies Limited ("**NuVision**") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and will tell you about your privacy rights and how the law protects you.

This privacy policy aims to give you information on how NuVision collects and processes your personal data if you are:

- i. a visitor of our website (<https://www.nu-vision.co.uk/>);
- ii. a customer who purchases our products; or
- iii. one of our suppliers.

This privacy policy contains the following sections:

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **2. THE DATA WE COLLECT ABOUT YOU**

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

### **4. HOW WE USE YOUR PERSONAL DATA**

### **5. DISCLOSURES OF YOUR PERSONAL DATA**

### **6. INTERNATIONAL TRANSFERS**

### **7. DATA SECURITY**

### **8. DATA RETENTION**

### **9. YOUR LEGAL RIGHTS**

## 1. Important information and who we are

It is important that you read this privacy policy together with any other privacy policy or fair processing policy/notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This website is not intended for children and we do not knowingly collect data relating to children.

### ***Controller***

NuVision is the controller of the personal data it processes and responsible for your personal data.

We have appointed a Data Protection Manager (DPM) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please contact our DPM using the details set out below.

### ***Changes to the privacy policy***

We keep our privacy policy under regular review. This version was last updated in October 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### ***Third-party links***

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). Depending on whether you are a visitor to our website, a customer purchasing our products, a patient using our product(s), or, one of our suppliers, we will collect, use, store and transfer different kinds of personal data about you. The personal data which we collect from you may include:

- **Identity Data** may include first name, last name, user name or similar identifier, title, date of birth and gender of our customer and supplier contacts and patients.
- **Contact Data** includes email address and telephone numbers for our customer and supplier contacts.
- **Financial Data** includes bank account and payment card details.
- **Special Categories of Personal Data**, also known as sensitive personal data, which includes information about your physical or mental health, health conditions, including environmental, socio-economic, and other clinical metrics pertinent to health and wellness.

- **Technical Data** acquired further to you accessing our website and includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password if you are a customer that has agreed to contribute to the ROMEO database (*for more information on how personal data is processed within the ROMEO database, please see the ROMEO privacy policy which can be found at <http://romeo.e-dendrite.com>*), your preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

When we process **Special Categories of Personal Data** this data is normally pseudonymised. This means that our processing of data which relates to a patient's health data, including information about a patient's medical/social history and blood results, will be undertaken in such a manner that the personal data can no longer be attributed to the specific person without the use of additional information. The additional information is kept separately and securely.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Privacy Policy.

All your personal data will be processed in accordance with this Privacy Policy, and in compliance with all applicable confidentiality guidelines.

The lawful bases we rely on to process your personal data is article 6(1)(a), (b) and (f) of the UK GDPR, which allows us to process personal information where you have provided consent, when the processing is necessary for the performance of a contract with you and where the processing is necessary for the purposes of a legitimate interest pursued by us.

The lawful bases we rely on to process your Special Category Personal Data, is article 9(2)(a),(h) or (i) of the UK GDPR, which allows us to process health information where you have provided explicit consent, or the processing is for the purposes of preventative or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services or pursuant to contract with a health professionals.

### ***If you fail to provide personal data***

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products). In this case, we may have to cancel a contract you have with us but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you depending on whether you are a supplier, customer or patient, including through:

**Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- enquire about our products;
- make a purchase;
- enter into a contract with us for the supply of products;
- subscribe to our publications/updates;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

**Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy at [www.nu-vision.co.uk/cookie-policy/] for further details.

We also use Google Analytics, a third-party service provider, to monitor and analyse the use of our website. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Where we need to perform the contract** we are about to enter into or have entered into with you which requires us to process your data where it is necessary for the performance of such contract to which you are a party or to take steps at your request before entering into such a contract; and
- **Where it is necessary to comply with our legal or regulatory obligations**, including in the UK those managed by the Human Tissue Authority ('HTA') under the Human Tissue Act 2004;
- **Where it is necessary for our legitimate interests**, or those of a third party, and your interests and fundamental rights do not override those interests. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best and most secure on-line service and product. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate

interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Generally, we do not rely on consent as a legal basis for processing your personal data. When we do you have the right to withdraw consent (e.g. to marketing) at any time by contacting us (see our contact details below).

***Purposes for which we will use your personal data***

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate. We may be processing your personal data further to more than one lawful ground depending on the specific purpose for which we are using your data.



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To engage with you as a new customer	(a) Identity  (b) Contact information	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments  (b) Collect and recover money owed to us	(a) Identity  (b) Contact  (c) Financial  (d) Transaction  (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:	(a) Identity	(a) Performance of a contract with you

<p>(a) Notifying you about changes to our terms of supply or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products, to keep our website updated and relevant, to develop</p>

		our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products and grow our business)
To use special category personal data for products	(a) Identity (b) Technical (c) Usage	Where the information contains health information the lawful basis, we rely on to process it is article 9(2)(a), (h) or (i) of the UK GDPR, which is where you have provided explicit consent, where it is for the purposes of preventative or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services or pursuant to contract with a health professionals.

**Marketing and promotional offers**

You will receive marketing communications from us if you have requested information from us or if you are a customer that has previously purchased goods from us and you have not opted out of receiving that marketing. We use a marketing agency called Podymos to send marketing emails to our customers on our behalf.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **or** by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, service experience or other transactions.

**Change of purpose**



We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above:

- IT providers / website hosting companies (Clifton Media, HUG Graphics, Baker Baird etc.);
- Human Tissue Authority;
- HMRC;
- Podymos.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

Your personal data will be stored on systems with technical and organisational security measures and controls located within the UK.

Sometimes, we will need to share your personal data with third parties and suppliers outside the UK, such as suppliers and partners based in Europe.

In the event we need to transfer your personal data outside the UK, for instance to our third party service providers, we will ensure we have in place adequate safeguards to do so. Our safeguards ensure that your personal data receives the same protection as if it were being processed inside the UK. For example, our contracts with third parties stipulate the standards they must follow at all times.

Any transfer of your personal data will follow applicable laws and we will follow the guiding principles of this Privacy Policy.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to



your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### *How long will you use my personal data for?*

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are

required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to exercise any of the rights set out above, please contact us.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our Data Protection Manager using the following information:

Name: Adrian Del Arenal Martin

Email address: [info@nu-vision.co.uk](mailto:info@nu-vision.co.uk)

For further information on data protection, please visit the Information Commissioners Office (ICO) website.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

**NuVision Biotherapies**

**Last review: October 2024**