

Privacy Policy

Please take the time to read the following information carefully so that you fully understand our views and practices regarding your personal data and how we will use it.

1. WHO DOES THIS PRIVACY NOTICE APPLY TO?

This privacy notice applies to individuals who:

- decide to register with us, or make an enquiry, for the purposes of donating blood, blood derivatives or other bodily fluids for scientific or medical research purposes (known as “donors” under this privacy notice), and donors (or potential donors) who attend our donor events;
- visit clintrialslab.com (our **Site**); and
- enter competitions, promotions or giveaways, or complete a survey or give us feedback.

This privacy notice **does not** apply to genetic material personal data (namely blood, blood derivatives or other bodily fluids) that we collect from donors. This is because in such instances details of what personal data we will collect and how we will process such personal data will be set out in separate consent forms and privacy notices.

Other than in relation to answers you choose to give us (including when you book an appointment or in response to surveys), under this privacy notice, we do not collect any personal data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health or genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

This Site, registering/enrolling as donors, donor events, entering competitions, promotions or giveaways, or completing a survey or giving us feedback are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notices 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 personal data and what your rights are under the UK’s Data Protection Act 2018 and the UK’s General Data Protection Regulation (collectively referred to as **Data Protection Laws**). This privacy notice supplements other notices and privacy notices and is not intended to override them unless otherwise stated.

Referring a Friend: If you would like to “refer a friend” to become a donor, you will need to provide their name, email address and telephone number. Before providing us with another person’s details, you must obtain their prior consent to you sharing their personal data with us and we will let them know that you have supplied their details to us. Where you have referred a friend to us, we will send your friend an email and at most one reminder email inviting him or her to register/enrol as a donor. We store this information for the sole purpose of sending these emails and tracking the success of your referral (including so that we can give or send you any bonus or voucher that you are eligible to receive). If your friend requests that we remove their details from our systems, we will honour such request and only retain a copy of their email address on a “suppression list” in order to comply with their no-contact request (they are free to change their marketing choices at any time).

2. WHO ARE WE AND OUR DPO

This privacy notice is issued by Clinical Trial Laboratory Services Limited whose principal place of business is Scale Space, 2nd Floor, 58 Wood Lane, London, WC12 7RZ (**CTLS**). CTLS is the controller of your personal data along with our parent company, BioIVT LLC (whose principal place of business is 123 Frost Street, Suite 115, New York, NY 11590) (**BioIVT**). You can learn more about us [here](#).

When we refer to **BioIVT**, **we**, **us** or **our** in this privacy notice, we are referring to CTLS and, as applicable, BioIVT.

If you have any questions regarding this privacy notice or believe we have breached Data Protection Laws, please contact our data protection officer at privacy@bioivt.com or write to us at your local donating center (marked for the attention of our Data Protection Officer):

- Scale Space, 2nd Floor, 58 Wood Lane, London, WC12 7RZ; or
- Ground Floor, Fleming Pavilion, Todd Campus, West of Scotland Science Park, Glasgow, G20 0XA.

3. ABOUT THIS PRIVACY NOTICE

This privacy notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity of the individual has been removed (anonymous data).

This privacy notice is effective on and from 10 July 2023. We may amend this privacy notice at any time, and whenever we do so we will notify you by posting a revised version on our Site and/or emailing you. Please review this privacy notice each time you access our Site or any of the features available on it as it may have been updated since your last visit.

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 (see [Who We Are and Our DPO](#) above). 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.

4. REGISTERING/ENROLLING AS A DONOR / ATTENDING DONOR EVENTS

We collect personal data about you through the enrolment/registration process, either directly from you or sometimes from our Site, when you register/attend any of our donor events, if you place an enquiry to donate or contact us for other purposes through our Site (including to learn more about becoming a donor).

In connection with your registration/enrolment as a donor, registration/attendance at any of our donor events and/or any enquiries you make about our donor services/opportunities, we will collect, store and use the following categories of personal data about you:

- your full name;
- your contact details including email address and phone number(s);
- your gender;
- the donor center location you choose;
- whether you are a new or returning donor;
- what you are interested in donating;

- what donor events you have attended or are interested in attending;
- information about you when you interact with us on social media platforms or access our social media content (the information we may receive is governed by the privacy settings, policies, and/or procedures of the applicable social media platform, and we encourage you to review them);
- information you give us when you attend any of our donor events including any information you complete in feedback or survey forms; any other information you are asked to provide on appointment or donor event booking forms or enquiry form (including how you heard about us and if you are a University student which University you attend) or that you voluntarily provide to us (including when attending a donor center or any details you provide in any messages you send to us); and
- your device location or other geolocation information (including the post code or county from which you accessed our Site).

Donation Notifications: We may, with your consent, contact you via SMS text message or email regarding your eligibility to donate (either because the required wait period between specimen donations (e.g. whole blood) has ended, or because we have a special donation program for which we believe you may be qualified) and/or promotional offers available to our donors. In doing this, we may use your name, email address, phone number and information about the type of donations you have participated in. Please see **Marketing** below for further information on our approach to marketing.

Test Results: We may contact you, when required, to share information resulting from the viral testing done on blood/plasma that you have previously donated. Contacting you to provide you with the viral test information on your previous donation(s) is required by various governmental entities and you may not opt-out of it.

We may also collect, use and share aggregated data about donors such as statistical or demographic data for any lawful purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate information about donor location to calculate the percentage of donors. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice and/or any other privacy notice(s) we provide at the time.

If you also enter any of our competitions, promotions or giveaways, or complete a survey or otherwise give us feedback, please see **Entering competitions, promotions or giveaways / completing surveys and giving feedback** below.

If you have also visited our Site, please see **Visitors to Our Site** below.

If you have questions about your rights with respect to your personal data, please see **Your Rights** below.

5. VISITORS TO OUR SITE

With regard to each of your visits to our Site, we will automatically collect:

- technical information, including the Internet Protocol (IP) address used to facilitate your connection to the Internet, browser type and version, time zone setting, browser plug-in types and versions, and hardware information;
- your device location or other geolocation information (including the post code or county from which you accessed our Site); and

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); services, products, publications and articles you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as clicks) and methods used to browse away from the page.

If you contact us via our Site we may also collect (as applicable) your name, email address, phone number and any other details you give us (including any other information you provide when you complete a form on our Site).

We may also collect, use and share aggregated data such as statistical or demographic data, for any lawful purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate information about how you use our Site to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice and/or any other privacy notice(s) we provide at the time.

Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our Site and to compile statistical reports on website activity. You can read more about how we use cookies in our [Cookie Policy](#). You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at www.allaboutcookies.org.

If you have also registered/enrolled as a donor, or registered for our donor events, please see ***Registering/Enrolling as Donor / Attending Donor Events*** above.

If you also enter any of our competitions, promotions or giveaways, or complete a survey or otherwise give us feedback, please see ***Entering competitions, promotions or giveaways / completing surveys and giving feedback*** below.

If you have questions about your rights with respect to your personal data, please see ***Your Rights*** below.

6. ENTERING COMPETITIONS, PROMOTIONS OR GIVEAWAYS / COMPLETING SURVEYS AND GIVING FEEDBACK

If you enter any of our competitions, promotions or giveaways, or complete a survey or otherwise give us feedback, we will hold (as applicable) your name, email address, phone number, location, device location or other geolocation information (including the post code or county from which you accessed such), and any other details you give us (including the details you complete if you use a form on our Site or at a donor center to contact us, the details you provide on entry, survey and feedback forms, and any other information you choose to give us). We will not collect any personal data about you if our survey or feedback forms are being run on an anonymous basis.

If you have also registered/enrolled as a donor, or registered for our donor events, please see ***Registering/Enrolling as Donor / Attending Donor Events*** above.

If you have also visited our Site, please see ***Visitors to Our Site*** below.

If you have questions about your rights with respect to your personal data, please see **Your Rights** below.

7. HOW WE USE PERSONAL DATA ABOUT YOU

We will use your personal data for the following legitimate interests (whether ours or a third party's) and your interests and fundamental rights do not override those interests including (as applicable) to:

- communicate with you in relation to:
 - your registration/enrolment as a donor;
 - an existing scheduled appointment or to inform you about a cancellation or the need to reschedule an existing scheduled appointment;
 - other donation opportunities that you have expressed a wish to hear about or that we think might be of interest to you (unless your consent is required as stated in this privacy notice);
 - your eligibility to donate;
 - donor events you have registered to attend, expressed a wish to hear about or that we think might be of interest to you (unless your consent is required as stated in this privacy notice);
 - your enquiries about our donor services, events and/or opportunities;
 - your donation milestones and donation anniversaries (unless your consent is required as stated in this privacy notice);
- send you important updates about changes in research conditions, contact information changes and operational changes;
- organising, and following up on, our donor events that you have registered to attend;
- ensure we keep up-to-date records about you and to manage our relationship with you (including to notify you of any changes to this privacy notice);
- seek your feedback on, and help us to, improve, personalise and develop our Site and/or donor services, events and/or products;
- understand donor demographics;
- determine additional products and/or services that we think would be of interest to our donors (unless your consent is required as stated in this privacy notice);
- measure donor satisfaction with our products, events and/or services;
- understand interactions with our brand;
- understand our donors;
- create and tailor marketing tactics and campaigns based on what we learn about you;
- send you information about promotional campaigns and other marketing content or sales follow-up calls (unless your consent is required as stated in this privacy notice);
- protect the rights, property or safety of BioIVT, our donors, customers, suppliers or others (we will also use your information where we are required by law to do so);
- improve our Site and ensure that content is presented in the most effective manner for you and for your device(s);
- conduct research and analysis;
- carry out internal operations (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- measure or understand the effectiveness of our Site and/or any marketing we serve to you and others, and delivering relevant marketing to you;
- deal with any issues you have reported with our Site;
- deal with any issues, complaints or concerns that have been reported to us; and
- exercise legal rights and/or defend claims.

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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us (see **Who We Are and Our DPO** above).

We will use personal data you have provided to us when you enter any of our competitions, promotions or giveaways to perform the contract we are about to enter into, or have entered into, with you.

Where we need to collect personal data in order for you to donate, or to enter any of our competitions, promotions or giveaways, and you fail to provide that data when requested you may not be able to (as applicable) donate or enter any of our competitions, promotions or giveaways.

In some limited circumstances, we may also use your personal data in the following situations:

- where you provide us your consent (e.g. to inform you of other donation opportunities, send you newsletters, keep you updated on promotional offers or events available to our donors, and to include your image in marketing collateral); and/or
- where we need to protect your interests (or someone else's interests) (e.g., if you are at one of our donor centers and we have a concern for your safety or wellbeing, we may need to contact your emergency contact/next of kin and ask them to come to the donor center).

8. WHO WE WILL SHARE YOUR PERSONAL DATA WITH

We will only share personal data with third parties (but only the minimum amount they need) in the following instances:

- our employees, contractors, consultants and agents (but their use shall be limited to the performance of their duties and in line with the reason for processing);
- other affiliates in the BioIVT group (acting as controllers or processors) who are based in the USA, the EEA, the UK, Serbia, Turkey and India and who: (i) provide support and services in relation to our Site, donor services and/or products, competitions, promotions, giveaways, surveys or feedback; (ii) provide IT and system administration services; and/or (iii) undertake administration, management and/or leadership reporting;
- when information about you is processed by third parties (acting as processors or controllers) who we use to help provide donor services and/or products including suppliers and partners who work at our donor centers;
- when information about you is processed by third parties (acting as processors) who own, host and/or support software, tools, IT and/or related infrastructure that we use in order to operate our business including (without limitation):
 - customer relationship, donor management and other IT-related systems;
 - email, instant messaging, document/contract management and file-sharing;
 - email and SMS management and/or delivery;
- when information about you is processed by third parties (acting as processors or controllers) who provide services, support, software and/or tools in relation to our Site, marketing, advertising campaigns, marketing and business analytics, marketing strategies, marketing research, marketing content and social media;
- when information about you is processed by third parties (acting as processors or controllers) to enable us to facilitate and manage:
 - competitions, promotions or giveaways which you enter including third parties who: (i) we partner with, or who sponsor, the competitions, promotions or

- giveaways; and/or (ii) provide software and/or tools that we use in connection with such competitions, promotions or giveaways;
 - surveys and feedback including third parties who: (i) we partner with; and/or (ii) provide software and/or tools that we use in connection with such surveys and feedback;
 - donor events which you have registered to attend including third parties who: (i) we partner with, or who sponsor or host, our donor events; and/or (ii) provide software and/or tools that we use in connection with such events;
- when information about you is shared with:
 - professional advisers (acting as processors or controllers) including lawyers, bankers, auditors, and insurers who provide legal, banking, accounting and insurance services/advice to us;
 - our regulators and other authorities (acting as controllers) who require reporting of processing activities in certain circumstances;
 - potential buyers (and their agents and advisers) (acting as controllers or processors) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this privacy notice and/or any other relevant privacy notices;
- if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets (acting as controllers or processors);
- where we are required by law to do so; and
- our telephony suppliers (which would get to see phone numbers if we call you) and our broadband suppliers (which could see email addresses (but not the content of what you send us, if you encrypt it)) (acting as processors).

To the extent required by law, 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 third party service providers who are processors to use your personal data for their own purposes and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. HOW LONG WE WILL RETAIN YOUR PERSONAL DATA FOR

Your personal data is kept for so long as it is required for the purposes set out in this privacy notice, or as long as we are legally required or permitted to retain such information. When deciding how long to retain your personal data, we take into account our legal and regulatory obligations, 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 described above, and whether we can achieve those purposes through other means.

In relation to donors, we are required to keep your donation records for up to 30 years in the UK. Some records may need to be stored indefinitely for legal and regulatory purposes. For example, if you have been permanently deferred from participating in our donation programs. In relation to individuals who:

- visit to our Site, your personal data is kept for up to 2 years and will then be deleted automatically;
- enter competitions, promotions or giveaways, your personal data will be kept for the duration of our contract with you and then for 7 years thereafter in the event of legal claims;
- complete surveys or give us feedback, your personal data will be kept for 6 months and will then be anonymised;

- register and/or attend our donor events, your personal data will be kept for 6 months after the event and will then be anonymised; and
- make enquiries about our donor services/opportunities, your personal data will be kept for up to 2 years and will then either be anonymised or deleted.

However, we may also retain your personal data for longer:

- to investigate or defend against legal claims (including potential or prospective legal claims) in accordance with the limitation periods of countries where legal action may be brought; and/or
- if we are required by law to retain it for longer, we will retain it for the required period.

10. INTERNATIONAL TRANSFERS

We may transfer your personal data to various jurisdictions to perform our obligations under this privacy notice and related agreements including (without limitation) countries in which we operate such as the USA, the EEA, Serbia, Turkey and India. The applicable data protection laws of those jurisdictions may differ from the data protection laws of the UK and, in some cases, may not be as protective. Whenever we transfer your personal data outside your country, we will ensure a similar degree of protection is afforded to it as the data protection laws of your country. For example, your personal data may be transferred to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government. In other instances, we will ensure at least one other lawful safeguard is implemented, which may include the use of specific contracts approved by the UK Government.

If you have questions about, or need further information concerning, international data transfers, please contact us (see *Who We Are and Our DPO* above).

11. YOUR RIGHTS

It is important that the personal data we hold about you is accurate and current. Please contact us (see *Who We Are and Our DPO* above) if your personal data changes during your relationship with us.

In relation to personal data that we hold about you, under Data Protection Laws you may have the right to:

- where we process your personal data based on your consent, withdraw your consent easily and at any time (withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent);
- get access to your personal data that we hold and receive information about our processing of it;
- ask us to correct the record of your personal data maintained by us if it is inaccurate or to complete incomplete personal data;
- ask us, in certain instances, to erase your personal data or cease processing;
- object to us processing your personal data for direct marketing purposes (see *Marketing* below);
- challenge us processing your personal data which has been justified on the basis of our or a third party's legitimate interests;
- ask us, in certain instances, to restrict processing personal data to merely storing it;
- ask us, in certain limited instances, to transfer your personal data to another online provider;

- be notified of a personal data breach which is likely to result in high risk to your rights and freedoms; and
- not be subjected to automated decision-making (including profiling) in certain circumstances.

Under Data Protection Laws, you may have the right to make a complaint to the Information Commissioner's Office (**ICO**) about our collection and use of your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us (see **Who We Are and Our DPO** above) in the first instance. You can contact the ICO via www.ico.gov.uk or by calling 0303 123 1113.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you would like to exercise any of these rights, please contact us (see **Who We Are and Our DPO** above). 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 calendar month (starting from the day we receive your request). 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.

12. HOW WE PROTECT YOUR PERSONAL DATA

To help protect the privacy of personal data you transmit, we maintain physical, technical, and administrative safeguards and, to the extent required by law, require the same of any third parties with which we share your personal data. We update and test our security technology on an ongoing basis. In addition, we train our staff about the importance of confidentiality and maintaining the privacy and security of your personal data.

As you will be aware the transmission of information via the internet is not completely secure. Although we will take measures to protect your personal data as described above, no security measures are perfect, and we cannot guarantee the security of your personal data transmitted to our Site or otherwise provided to us; any transmission is at your own risk.

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

13. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To opt out of marketing communications, see **Opting out** below.

You have a choice about whether or not you wish to receive direct marketing communications from us. If you want to receive direct marketing communications from us then you can select your choices by ticking the relevant boxes situated on the form(s) on which we collect your personal data. Opting out of receiving marketing communications will not affect the processing of personal data for the provision of non-marketing communications, such as those about test results and your donation appointment.

For information on marketing communications relating to your eligibility to donate and/or promotional offers available to our donors, please also see [**Registering/Enrolling as Donor / Attending Donor Events**](#) above.

Third-party marketing: We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out: You can ask us to stop sending you marketing messages at any time by following the opt-out links in any marketing message we send you or by contacting us (see [***Who We Are and Our DPO***](#) above) any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us in relation to our donor services or products. Please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address on a "suppression list" in order to comply with your no-contact request.

14. LINKS TO THIRD PARTY WEBSITES

Our Site may, from time to time, contain links to and from the websites of third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Our Site uses interfaces with social media sites such as LinkedIn, Twitter and others. If you choose to "like" or share information from our Site through these services, you should review the privacy notice of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your Site visit to your personal data.