

DATA PROTECTION POLICY – EXTERNAL

*This Policy is for publication on Inify Laboratories' webpage.
Compliant with: UK GDPR + Data Protection Act 2018 + ICO supervision*

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1 Introduction

In this privacy policy you will find general information about how Inify Laboratories processes personal data. Inify Laboratories AB ("Inify", the "Company", "we", "us") takes your privacy and data protection seriously and ensure all processing complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This privacy policy is aimed at our patients, customers, you who visit and/or contact us via our website, represent an existing or potential customer or receive newsletters/marketing mailings. The policy explains how we collect and use your personal information. It also describes what rights you have and how you can use them.

2 Responsibility for Personal Data

Inify Laboratories Ltd is the Data Controller for personal data processed within our UK operations.

It is Inify Laboratories AB, with Corporate Identity Number 559345-4431, who is responsible for personal data and responsible for the personal data processing that takes place within all our operations in the Group. We are also responsible for ensuring that personal data is processed in accordance with applicable legislation. If you have questions regarding privacy and data protection, you can send a question to dataprotection@inify.com.

Under "contact" on the website there are also more contact routes.

3 Data Protection Officer

Inify Laboratories has a Data Protection Officer whose task is to monitor that we comply with the Data Protection Regulation and other relevant legislation.

You can contact the Data Protection Officer if you have questions regarding our personal data processing or if you want to exercise any of your rights regarding personal data processing. The easiest way to do this is to send an email to dataprotection@inify.com or a letter to:

Data Protection Officer, at Inify Laboratories AB, Scheeles väg 3, 171 65 Solna, Sweden.

4 Data Protection Policy

4.1 What is Personal Data and Processing?

Personal data is any kind of information that can be linked to an individual physical person. If the information can be linked to a living person, either directly or indirectly, individually or in combination with other information, it should be considered personal data. This can be, for example, name, address, social security number, photographs and sound recordings. Some personal data is considered sensitive, and these must be protected extra carefully.

Examples of sensitive personal data may be information about religious beliefs, political opinions, health and trade union membership. Processing of personal data is everything that happens with the personal data. Any action taken with personal data constitutes processing, regardless of whether it is carried out by automated means or not. Examples of common processing are collection, registration, organization, structuring, storage, processing, transfer and deletion.

4.2 Processing of Personal Data

Inify processes personal data primarily about four categories of data subjects: patients, customers, job applicants and visitors to our website. Below is a description of the personal data processing carried out for these categories.

4.2.1 Patients

Inify has several healthcare providers as customers, both public hospitals and private clinics. When you visit one of these actors for a doctor's visit and this visit results in samples being taken from you, which are to be analysed for some type of cancer, the healthcare provider sends a request to us. When this transfer takes place, it is only done with your consent. At this initial stage, the public or private healthcare provider is the data controller and thus responsible for the personal data processing that takes place until the request is sent to us. Inify is the data controller for the processing of personal data that is done within the framework of our business. When your doctor sends us a request with samples to be analysed, we collect this data and become the data controller for this processing. As a healthcare provider, Inify processes your personal data in order to provide healthcare by performing diagnostic examinations.

Processing of personal data: We process personal data when we receive requests for medical analysis, perform analysis, compile test results and send test results back to referring healthcare providers.

Purpose/purpose: The purpose of this personal data processing is that we should be able to investigate referred cancer diagnostics and obtain an analysis response to your request. This is done so that you as a patient can receive good care.

Categories of personal data: Data processed is the patient's name, social security number and state of health.

Legal basis: This personal data processing is based on consent between patient and requesting clinic.

Storage period and/or criteria: The analysis report containing your personal data is saved for 10 years.

4.2.2 Research and Quality Development

Processing: Use of tissue samples and digital images of tissue samples internally at Inify.

Purpose: Stored tissue samples, or digital images of tissue samples, may be used for research, development of analysis methods and quality monitoring by Inify's laboratory service.

Categories of personal data: Data processed is the patient's name, social security number and state of health. Patient data is pseudonymised and thus not directly visible to those within Inify Laboratories who work with research, development and quality assurance, but traceability between tissue samples and patient data is stored.

Legal basis: Tissue samples may be used for research purposes and quality development in accordance with the **Human Tissue Act**. If you do not want your samples to be stored and used for research and quality development, you must actively state this to the healthcare provider who performs the sampling.

Storage period and/or criteria: Tissue samples are stored for 10 years.

4.2.3 Customers

When other healthcare providers, such as hospitals, clinics and so on, are interested in our services and contact us in this regard, we process their personal data in different contexts. This is explained below.

Processing: Contact with you as a representative of a potential customer.

Purpose: For us to be able to market our services, identify new customers and create quotes in our sales process, we process your personal data as a representative of a potential customer. For example, we use compilations of public sources and databases as well as social media to identify representatives of potential customers.

Categories of personal data: We collect name, e-mail address, address, telephone number (work) and information about department affiliation and position. We also note if there is interest from the organization that you represent.

Legal basis: we base this processing, after a balance of interests, on our legitimate interest in identifying new customers to market our service offering to them.

Storage period and/or criteria: The personal data is saved in our CRM system and saved for a maximum of five years. As a representative of a potential customer, you can always ask us to unsubscribe.

4.2.4 Job Applications

Applications for employment with us, both from job advertisements and spontaneous applications.

Processing: Contact with you as a job seeker.

Purpose: To enable us to contact you in an ongoing recruitment process, and to have the opportunity to contact previous applicants if new opportunities for employment arise.

Categories of personal data: We collect your name, e-mail address, telephone number and your CV in cases where you have sent it to us.

Legal basis: We base this processing, after a balance of interests, on our legitimate interest in identifying new recruitment opportunities.

Storage period and/or criteria: Personal data is stored locally at our HR department, for a maximum of three years. You could request that we do not save your information.

4.3 Marketing

4.3.1 Mailings

Processing: Marketing mailings

Purpose: We process personal data to offer information and marketing mailings to representatives of existing and potential customers. Personal data is collected directly from representatives of existing and potential customers, for example in connection with events, or through public sources and databases. The information is provided by telephone, letter, e-mail, SMS and/or equivalent contact channels, as well as through advertising.

Categories of personal data: Personal data processed is name, e-mail address, address, telephone number (work) and information about department affiliation and position. We also process information about website visitors' usage, clicks on the website, traffic data (IP address and device model) and data traffic source (for example, if you clicked through to our website through campaigns) through cookies to optimize marketing.

Legal basis: The legal basis for this processing is our legitimate interest in being able to provide information about and market our services.

Storage period and/or criteria: The personal data will be saved until the purpose of these is fulfilled. You can always ask us to unsubscribe. We will then stop processing your personal data for this purpose.

4.3.2 Marketing Activities and Events

Processing: marketing activities and events.

Purpose: We may contact you as a representative of existing or potential customers to invite you to marketing activities (event, lecture, seminar or similar). We process personal data to the extent necessary to carry out the activity, to follow up participation and to be able to target marketing. In case meals are served during activities organized by us, we will ask if you have any specific dietary preferences.

Categories of personal data: We process your name, e-mail address, address, telephone number (work) and other relevant contact information that you have given us, which we have collected from public sources and databases, or from our CRM systems if you are an existing customer representative, in order to be able to send out notices, list of participants and material before and after the activity.

Legal basis: We process your personal data according to our legitimate interest in being able to inform about events that we organize, carry out the event and to be able to direct offers of our services to the participants.

Storage period and/or criteria: We process your personal data for as long as it is necessary to carry out the event. The participant list is saved for administration and follow-up so that we can target marketing to participants about our services. You may object to our processing of your personal data for this purpose at any time and we will then stop processing your personal data, unless we have a different purpose as set out in this Privacy Notice.

4.3.3 Media Production

Processing: Media production for marketing.

Purpose: To market and spread knowledge about our business, we may, if you have given consent, process personal data in the form of images, sound recordings, posts and links to social media and publication of articles on our intranet and on our websites.

Categories of personal data: Personal data that we process includes images, videos, sound recordings, information contained in articles that we publish (such as name and title and social media username) and that we collect directly from you or through photographers that we engage.

Legal basis: We base the processing on your consent, and you have the right to withdraw your consent at any time.

Storage period and/or criteria: the processing will take place until we have fulfilled the purpose or until the consent has been withdrawn. In cases where media have been published on social media and the like, and you withdraw your consent, we will remove the information from the channels that we have control over and are responsible for. However, we are not responsible for media that have already been published and disseminated on additional pages, which are under the control and personal responsibility of third parties.

4.3.4 Website

We have contact forms that can be filled in via our website in case you actively wish to contact us.

Processing: To communicate with and answer questions from you.

Purpose: We process your personal data for the purpose of communicating with you and answering questions from you when you actively interact with us, for example if we receive a question from you regarding our service offering.

Categories of personal data: We collect your name, e-mail address, address, telephone number (work) and other information that you provide to us.

Legal basis: The legal basis for this processing is a balance of interests to satisfy our legitimate interest in being able to communicate with you and handle questions from you. On the website, you are asked if you accept cookies and can always opt out. What cookies we collect is stated on the website.

Storage period and/or criteria: We process your personal data for as long as it is necessary to fulfil our purpose and will then delete the personal data unless we have another purpose according to this privacy notice.

4.3.5 Campaign Management and Personalization of our Website

Processing: Campaign management and personalization of our website.

Purpose: When visiting our website, information from the browser/device may be retrieved and stored, usually through cookies, to optimize both the function and experience of the website.

Categories of personal data: The information consists of the visitor's preferences and information about the device from which the visit takes place. Such information may include information about the use of the website, traffic data (such as IP address and device model) and data traffic source (for example, if you clicked through to our website through campaigns).

Legal basis: This personal data processing is based on our legitimate interest. You can object to this processing at any time by adjusting your cookie preferences.

Storage period and/or criteria: Unless you have adjusted your cookie preferences, we process your personal data for as long as it is necessary to fulfil our purpose and will then delete the personal data.

4.3.6 Usage, Error Handling and Statistics Related to our Webpage

Processing: Collection on data related to usage, error handling and statistics for our webpage.

Purpose: We process certain information on visitors of our webpage to optimize the webpage, collect statistics and perform error handling.

Categories of personal data: Personal data is collected through cookies and consists off IP-address, unit model and data traffic source. (e.g. if you find the path to our webpage through a marketing campaign)

Legal basis: This personal data processing is based on our legitimate interest. You can object to this processing at any time by adjusting your cookie preferences.

Storage period and/or criteria: Unless you have adjusted your cookie preferences, we process your personal data for as long as it is necessary to fulfil our purpose and will then delete the personal data.

4.4 Who May we Share your Personal Data with?

In cases where necessary, we share your personal data with companies that in one way or another are subcontractors to us. These subcontractors are called personal data assistants. A **Data Processor** is a company that processes information on our behalf and according to our instructions. We have data processors who help us with:



- IT services (companies that handle the necessary operation, technical support and maintenance of our IT solutions).
- Training and events.

When your personal data is shared with data processors, it is only for the purposes we have specified. We check all data processors to ensure that they can provide sufficient guarantees for the security and confidentiality of personal data. We have written agreements with all data processors in which they guarantee the security of the personal data processed and undertake to comply with our security requirements as well as restrictions and requirements regarding the international transfer of personal data. We never pass on your personal data to any other third party.

4.5 Where do we Process your Personal Data?

We strive to process all data within the UK and EU but may in some cases transfer personal data to recipients in countries outside these areas that do not have the same level of protection for personal data. To ensure that personal data is adequately protected, we will take the necessary measures, for example by entering the legal UK standards and the EU Commission's standards for contractual clauses or ensuring that there are other appropriate safeguards in place.

4.6 How Long is your Personal Data Stored?

Your personal data is not stored longer than necessary and follows clear deletion routines. Data is processed for different periods of time to provide the opportunity to fulfil our legal obligations or offer as good a service as possible. Information about storage time is given at the start of the treatment and if you have questions about processing time, you can contact your question to the e-mail address: dataprotection@inify.com

4.7 Your Rights

Inify is responsible for ensuring that your personal data is processed in accordance with applicable legislation. According to the General Data Protection Regulation, you have certain rights in relation to how we process your personal data. Below you will find these rights. If you have questions about how your personal data is processed or want to exercise any of your rights, please contact us by e-mail or letter, contact details are below.

You have the right to **access your personal data** (right to a so-called register extract). This means that you have the right to request information about what personal data we process about you, this can be done by requesting a register extract.

You have the right to **rectification** if you believe that personal data about you is incorrect or incomplete. Once your personal data has been corrected, we will notify everyone to whom we have disclosed the personal data that correction has taken place.

In some cases, you have the right to be **deleted**, for example, if your personal data is no longer necessary for the purpose for which it was collected or if you believe that the processing is not compatible with data protection legislation. However, there may be legal obligations for us to retain your personal data, which means that we cannot delete your information.

There may be situations where you have the right to **demand restriction** of the processing of your personal data. If you believe that your personal data is incorrect, you can demand that we restrict the processing of your personal data while we check this.

Furthermore, you may also have the right to **data portability**. Data portability means a right, under certain conditions, to obtain and transfer your personal data in a structured and machine-readable format to another personal data controller.

In some cases, you have the right to **object**. This applies, for example, when we process your personal data based on the legal basis legitimate interest. If such a circumstance exists, we may only continue processing the data if it can be shown that there are compelling legitimate reasons why the data must be processed.

If you have given your **consent** for personal data processing to be carried out, you have the right to **withdraw your consent**. You can withdraw your consent at any time and if you do, we will immediately stop processing your data.

The EU and UK's General Data Protection Regulation and other countries' personal data laws provide special rights for data subjects. A good explanation of these can be found on the UK data protection authority ICO, at <https://ico.org.uk>

4.8 Security of your Personal Data

To protect the privacy of your personal data, we take appropriate technical and organizational safeguards to ensure that all information we process is protected from unauthorized access, alteration and destruction.

We continuously update and test our security technology. We limit access to your personal data to those employees who need to know it to perform their work. In addition, we educate our employees on the importance of confidentiality and maintain the integrity and security of your information. We commit to take appropriate disciplinary action to uphold the privacy responsibilities of our employees.

4.9 Complaints

If you are not satisfied with how we process your personal data, we would like you to contact us by e-mail or letter at the address below.

You also have the right to lodge a complaint with the UK Legal authority **Information Commissioner's Office (ICO)**, [Make a complaint | ICO](#).

4.10 Contact Details

Our contact information for questions, inquiries and complaints:

Inify Laboratories AB

Corporate identity number: 559345-4431

Postal address: Scheeles väg 3, 171 65 Solna, Sweden

Email Address: dataprotection@inify.com

4.11 Additional Information

We recognize that data protection and privacy issues are a long-term responsibility, which is why we may update this Privacy Policy from time to time, the valid version is available on our website.