

Privacy Policy

1. Introduction

- 1.1. CellBxHealth plc and its subsidiaries (“CellBxHealth”) are committed to protecting and respecting your privacy.
- 1.2. This Privacy Policy (the “Policy”) applies to current and former CellBxHealth employees and workers, consultants and contractors working on behalf of CellBxHealth and all individuals who apply for positions with CellBxHealth, whether successful or unsuccessful.
- 1.3. The Data Protection Act 1998 contained rules about how personal data should be collected and processed. It was replaced by the UK GDPR and Data Protection Act 2018 which is the UK implementation of the EU General Data Protection Regulation (GDPR). This Policy takes account of GDPR. We will keep it under review and let you know of any changes.
- 1.4. Under data protection laws, we are the data controller in relation to your personal data. This means we are responsible for deciding what information to collect about you and how it is used.
- 1.5. Personal data broadly means information about an individual who can be identified from that information directly or indirectly (for example, if it is combined with other available information).
- 1.6. In this Policy, “CellBxHealth”, “we”, “us” and “our” refer to CellBxHealth plc and its subsidiaries. For more information about us, see Section 9.

2. Data protection principles

2.1. In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment or engagement in ways that have been explained to you
- only use it in a way that we have told you about
- ensure that it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

3. How we use your personal data

3.1. In this Section 3 we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

3.2. The categories of personal data we collect about you in connection with your employment or engagement with CellBxHealth may include:

- Name, home address, mobile and/or home telephone number, email addresses, date of birth, marital status, details of immediate family, emergency contact details;
- Medical conditions and allergies;
- Driver's licence, car registration number, evidence of motor insurance for business use, valid MOT certificate of own car;
- Residency, nationality, work permit status, passport information;
- National Insurance number, other taxpayer ID numbers, banking details;
- Sick pay, pensions, insurance, other benefits information;
- Work history, CVs, cover letters, interview notes, references, educational and professional records and certificates, training records, appraisals, timesheets;
- Photographs, CCTV footage, usernames, information for IT and workplace security;
- Information related to termination of employment;
- Information we collect to comply with requests and directions of regulatory bodies, law enforcement bodies or court orders.

3.3. We use your personal data for the following purposes and under the following legal bases:

1. *In connection with your contract of employment with us.* We hold your personal data because we need it to meet our contractual obligations in connection with your engagement by CellBxHealth. This includes providing pay and benefits, making sure we can correspond with you and information about your health, including any medical condition and sickness records.
2. *In connection with our legal responsibilities.* We are required by law to collect and hold certain personal data, for example tax codes and National Insurance numbers to comply with the requirements of HM Revenue and Customs. We may also be obliged to share your personal data to comply with demands or requests by relevant regulators or government bodies, for example, the Home Office in relation to immigration status. It may also be necessary to collect personal data relevant to any claims or legal disputes, in relation to your employment or otherwise. In addition to this, we may also collect information related to criminal convictions and offences.
3. *In connection with our management responsibilities and legitimate interests.* Our management responsibilities are those necessary for the effective functioning of the business and to support our people. This includes recruitment, training and development, absence, disciplinary matters, health and safety, security, employee performance and reward. We may also require certain information in order to protect the rights and health and safety of other employees or third parties. This would be within our legitimate interests.

3.4. We may process any of your personal data identified in this Policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business

against risks. 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.

- 3.5. In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data (without your knowledge and consent) where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.6. One of the reasons for processing your data is to allow us to carry out our duties in line with your contract with us. If you do not provide us with the data needed to do this, we will be unable to perform those duties e.g. ensuring you are paid and taxed correctly. We may also be prevented from confirming, or continuing with, your employment/engagement with us in relation to our legal obligations if you do not provide us with this information, for example confirming your right to work in the UK or, where appropriate, confirming your legal status for carrying out your work via a criminal records check.
- 3.7. Please do not supply any other person's personal data to us, unless we ask you to do so.

4. Providing your personal data to others

- 4.1. We may disclose your personal data to any member of our group of companies (this means our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Policy.
- 4.2. We may disclose your personal data to our insurers and professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3. We use a third-party payroll agency to process the CellBxHealth payroll each period, which includes calculating net pay and tax deductions for each employee, and reporting tax deductions to HM Revenue and Customs. The legal basis for this is performance of contract and legal obligations.
- 4.4. We may disclose your personal data specifically in relation to academic qualifications to HM Revenue and Customs or other Government bodies to comply with “knowledge intensive” rules to comply with Tax or Grant incentive arrangements.
- 4.5. We use third parties to administer our health insurance and life assurance policies. They have access to the personal data you provided when completing the health insurance application, and the personal data CellBxHealth provided in order for them to take out appropriate policies. The legal basis for this processing is performance of contract.
- 4.6. In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

- 5.1. In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.2. We have offices and facilities in the United States of America (“USA”). The European Commission has made an "adequacy decision" with respect to the USA data protection laws and transfers to the USA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- 5.3. Our hosted email servers are situated in the USA. Any email received or sent from or to a CellBxHealth email address will therefore pass through the USA. The European Commission has made an "adequacy decision" with respect to the data protection laws of this country. Transfers to this country will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en
- 5.4 All our third-party providers and other entities in the group are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Protecting your data

- 6.1. We are aware of the requirement to ensure that your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such, which are set out in our Data Protection Policy and Acceptable Use Policy (IT Systems).
- 6.2. Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with current data protection requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

7. Retaining and deleting personal data

- 7.1. The Data Retention Policy is designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2. Notwithstanding the other provisions, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use that information without further notice to you. Once you are no longer an employee, worker or contractor of CellBxHealth, we will retain and securely destroy your personal data in accordance with our Data Retention policy OR applicable laws and regulations.

8. Amendments

- 8.1. We may update this Policy from time to time by publishing a new version on the CellBxHealth intranet.
- 8.2. You should check this document occasionally to ensure you are happy with any changes to this Policy.

9. Your rights

- 9.1. In this Section 9, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 9.2. Your principal rights under data protection law are:
 - (a) the right to be informed;
 - (b) the right of access;
 - (c) the right to rectification;
 - (d) the right to erasure;
 - (e) the right to restrict processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent where given.
- 9.3. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data within 1 month of a formal request being received unless an exception applies. The first copy will be provided free of charge (so long as the information requested is not manifestly unfounded or excessive) but additional copies may be subject to a reasonable fee.
- 9.4. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. 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 working relationship with us.
- 9.5. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- 9.6. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 9.7. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 9.8. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 9.9. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 9.10. You have the right to receive your personal data from us in a structured, commonly used and electronic format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 9.11. If you consider that our processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling +44 (0)303 123 1113 or go online to www.ico.org.uk/concerns. If you are based outside the UK, but within the EU, you have the right to lodge your complaint with the relevant data protection regulator in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 9.12. To the extent that the legal basis for our processing of your personal data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 9.13. You may exercise any of your rights in relation to your personal data by written notice to us.

10. Breach notification

- 10.1. It is CellBxHealth's policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the applicable legislation, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, where required the relevant supervisory authority will be informed within the specified

timeframe (for example, for the GDPR within 72 hours). If acting as a data processor, CellBxHealth shall notify the data controller of the data breach security incident.”

10.2. If you need to report an actual or suspected data breach, please do so as soon as possible and notify CellBxHealth’s data protection officer at DPO@cellbxhealth.com.

11. Our details

11.1. CellBxHealth plc is registered in England and Wales under registration number 04985171, and our registered office is at 10 Nugent Road, Surrey Research Park, Guildford, Surrey, GU2 7AF, UK.

11.2. Our principal place of business is at the above address.

11.3. Our subsidiaries (by whom you may be employed) include CellBxHealth Europe Limited and CellBxHealth Inc.

11.4. You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

12. Data Protection Officer

12.1. You can contact our data protection officer by writing to:

Data Protection Officer
CellBxHealth plc
10 Nugent Road
Surrey Research Park
Guildford
Surrey
GU2 7AF
United Kingdom

Or by emailing: DPO@cellbxhealth.com

Document Revision History

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A1	16 Jan 2025	Drafted	James Smith
B	16 Jan 2025	Final Version Published	James Smith
C	16 May 2025	Updated to cover job candidates and interview data	James Smith
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