

Title: **Privacy Policy (External)**

Doc No.: **POL004**

Version No.: **02**

Effective Date: **08/11/2021**

## **Introduction**

Welcome to the Nova Bio-Pharma Holdings Limited's privacy notice. This privacy notice applies to all companies within Nova's group (**Nova**).

Nova respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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

### 1.1 PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Nova Laboratories collects and processes your personal data through your use of this website, including any data you may provide through our website. Unless you specifically complete the contact form and opt in, we do not hold any data on you just from visiting our website.

This website is 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 notice or fair processing 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 privacy notice supplements the other notices and is not intended to override them.

### 1.2 CONTROLLER

Nova Bio-Pharma Holdings Limited is made up of different legal entities, details of which can be found here. This privacy notice is issued on behalf of the Nova Group so when we mention "Nova", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Nova Group responsible for processing your data. Nova Laboratories Limited is the controller and responsible for this website.

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

**Our full details are:** Nova Laboratories Limited (Company Number: 02875110)

**Full name of legal entity:** Nova Laboratories Limited

**Name or title of DPO:** Aaron Edge

**Email address:** DPO@novalabs.co.uk

**Postal address:** Martin House, Gloucester Crescent, Wigston LE18 4YL

**Telephone number:** +44 (0) 116 223 0100

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

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### 1.3 CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in November 2021 and historic versions can be obtained by contacting us.

The data protection law in the UK changed on 6 June 2018.

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.

### 1.4 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 notice 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name and last name.
- **Contact Data** includes company billing address, delivery address, email address and telephone numbers.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing information from us and our third parties and your communication preferences.
- **Health Data** information about your health you have provided to us as part of an adverse event report, medical information inquiry or product quality complaint.

We do not collect the following **Special Categories of Personal Data** about you race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

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- **Direct interactions.** You may give us your Identity, Contact and Health Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - subscribe to our service or publications;
  - request marketing information to be sent to you;
  - share adverse events or medical information inquiries with us

#### 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.
- 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.
- Where we need to comply with a legal or regulatory obligation.
- Report the adverse events you notify us about

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [DPO@novalabs.co.uk](mailto:DPO@novalabs.co.uk).

##### 4.1 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please see the table below and section 10.1 if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests

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(a) Manage payments, fees and charges (b) Collect and recover money owed to us	(c) Financial (d) Transaction (e) Marketing and Communications	(to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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) (b) Necessary to comply with a legal obligation
Record-keeping regulatory monitoring and reporting obligations, including those related to adverse events, product complaints and product safety;	(a) Identity (b) Contact (c) Health	(a) Necessary to comply with a legal obligation

## 4.2 MARKETING

We will only contact you if you have asked us to and we will only hold your data for so long as is necessary and lawful.

## 4.3 THIRD-PARTY MARKETING

We will not share your personal data with any company outside the Nova group of companies for marketing purposes.

## 4.4 OPTING OUT

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You can ask us to stop sending you messages at any time by contacting us at [DPO@novalabs.co.uk](mailto:DPO@novalabs.co.uk).

Where you opt out of receiving these messages, this will not apply to personal data provided to us as a result of a purchase.

#### **4.5 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 have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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**

We do not transfer your personal data outside the UK or European Economic Area (EEA).

#### **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.

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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 necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [Request erasure] below for further information.

In some circumstances we may 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. Please click on the links below to find out more about these rights:

- [Request access to your personal data].
- [Request correction of your personal data].
- [Request erasure of your personal data].
- [Object to processing of your personal data].
- [Request restriction of processing your personal data].
- [Request transfer of your personal data].
- [Right to withdraw consent].

If you wish to exercise any of the rights set out above, please contact the DPO as set out in paragraph 1.2 above.

### **9.1 NO FEE USUALLY REQUIRED**

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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 may refuse to comply with your request in these circumstances.

## 9.2 WHAT WE MAY NEED FROM YOU

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.

## 9.3 TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may 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.

## 10. GLOSSARY

### 10.1 LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### 10.2 THIRD PARTIES

#### Internal Third Parties

Other companies in the Nova Group and who are based in the United Kingdom and provide IT and system administration services.

#### External Third Parties

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- Service providers acting as processors based within the UK who provide IT, system administration, pharmacovigilance and medical information services. Please contact us at [DPO@novalabs.co.uk](mailto:DPO@novalabs.co.uk) for a current list of providers.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based within the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] based [in the United Kingdom] [who require reporting of processing activities in certain circumstances].

### 10.3 YOUR LEGAL RIGHTS

You have the right to:

1. **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.
2. **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.
3. **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.
4. **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.
5. **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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase

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it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

6. **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.
7. **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.

DO NOT COPY