



Edison

Privacy and Cookie Policy

PDM203



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Preamble

Perspectum Diagnostics Ltd (“we” or “us”) is committed to safeguarding the privacy of individuals. The provisions of this Privacy and Cookie Policy (the “Policy”) will apply to registered users of Edison, our cloud-based customer portal (“Edison”) (“you”). This Policy sets out the basis on which any personal data that you provide to us or that we collect from you will be used by us. It also provides you with information about our use of cookies. **By using Edison or otherwise providing us with any personal data you consent to our using, storing and transferring such personal data in accordance with this Policy, and you consent to our use of cookies in accordance with this Policy.** Please read this Policy carefully and ensure you understand our rights and responsibilities under it.

If you are a registered user Edison then additional terms of use will apply to your use of Edison, which should be read together with this Policy.

1. Who We Are

For the purposes of the General Data Protection Regulation (the “Regulation”) the data controller is Perspectum Diagnostics Ltd, a company incorporated and registered in the United Kingdom under number 08219473, with its registered office address at Beaver House, 23 - 38 Hythe Bridge St, Oxford OX1 2ET, England.

2. Personal Data We Collect

We may collect, retain and use the personal data that you provide to us:

- through the “Report a Problem” form on Edison
- through correspondence with you
- which you provide to us in registering for our services or otherwise in connection with any contract between you and us or
- which you may include in data submitted to us via Edison from time to time. **Please note that you must not in using Edison submit to us any personal data relating to your patients or trial or study participants unless we have provided express written approval. Without our approval, we require that all such data provided to us in your use of Edison, and in particular any sensitive medical data (such as MRI images), has been anonymised so that it no longer constitutes personal data and no individual is identifiable to us from it.** In any data provided by you to us, only non-personal identifiers (such as numbers or keys) should be used, and we must not be given any information which would, in combination with those identifiers, allow the individuals concerned to be identified. If we do accept identifiable patient or participant Personal Data we shall process it in accordance with applicable legislation, including the Regulation and the Health Insurance Portability and Accountability Act and shall only process it for the purposes of providing our services to you.

The personal data we collect, retain and use may include your (or your personnel’s) name, email address, telephone number and other contact details, individual passwords and logins and any other personal information you provide to us. It may also include similar data in relation to third parties. **If you provide us with any personal data relating to any person other than yourself, you warrant that you have obtained that person’s consent to the disclosure of that personal data to us, and to our using, storing and transferring it in accordance with this Policy.**

We may also collect, retain and use certain technical information regarding your visit to the Site or Edison. This may include the Internet Protocol (IP) address from which you visit the Site and non-identifying information regarding your usage of the Site or Edison (including browsing and click-stream activity and your chosen browser and internet service provider. You should also see Section 8 below (headed “Cookies”) for information about the cookies which we may use to collect such technical information.

3. Our Use of Personal Data

We use the personal data that you provide to us in order to correspond with you, provide services to you in accordance with any contracts we have agreed with you, and to exercise our rights under those terms’ contracts. We may also use your personal data to notify you of news relating to our business, or to any of our products and services which are similar to those which you have previously purchased or about which you have previously enquired.

As discussed above, unless expressly approved by us in writing, we require data provided to us through Edison which relates to patients, or to participants in trials or studies, to be anonymised so that it no longer constitutes personal data from which any individual may be identified. Unless we have agreed otherwise in any contract with you (in which case the position in that contract shall apply) we may use such anonymised data for our internal business purposes, including without limitation the improvement of our products and services. For example, we may retain anonymised MRI data for the purposes of testing, validating and improving our imaging software. **Even though we require such data to be anonymised, we still follow rigorous physical, network and process security measures and safeguards in relation to it, intended to prevent unauthorised access or disclosure.** This is to provide an extra layer of security in case you erroneously submit sensitive personal data to us.

The technical information regarding your visit to the Site or Edison is used by us to ensure that the Site or Edison is presented compatibly with your device and operating system and for also for anonymised analytics activities. You should also see Section 8 below (headed “Cookies”) for information about how we use cookies.

4. Sharing Your Personal Data

We may share your personal information with any member of our group of companies (which means our subsidiaries, our ultimate holding company and its subsidiaries) from time to time.

We may share your personal information with our business partners, service providers and sub-contractors to the extent necessary for the performance of any contract we enter into with you, or for the performance of such services as those third parties may provide to us. In particular, our service providers may include (without limitation):

- Amazon Web Services, who provide us with hosting services and who will in the course of hosting come into possession of your personal information (together with our general business information and software)
- any other hosting service providers in relation to Edison, who may in the course of hosting come into possession of technical information regarding your visit to and use of the Site;

- Microsoft, Inc., who provides us with their cloud-based Microsoft 365 service as well as their cloud-based Dynamics customer relationship management (CRM) service. Microsoft will host our emails as well as various of our internal documents on its servers, and their CRM service is used by us to keep track of our correspondence and contact with our clients and commercial prospects; and
- Zoho Corporation., who provides us with a cloud-based customer relationship management (CRM) service which we use to keep track of our correspondence and contact with our clients and commercial prospects.

Each of these service providers may further provide your personal information to their own service providers who provide necessary support functions (for instance, the third parties who host their servers). However, such disclosure will again only be for the purpose of providing the relevant services to us or the performance of any contract between you and us.

We may also disclose your personal information to third parties:

- to any prospective acquirer of all or part of our business or assets (in which case our accumulated data, including your personal data, may be comprised in our business or assets);
- where relevant, to any prospective seller of any business or assets which we wish to purchase (for example, if we were purchasing some technology to support our service offering, we might ask the prospective seller to demonstrate its efficacy by using one of our data sets); or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any contract between you and us or to protect our rights, property, and safety or those of our customers or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Otherwise, we will not provide your personal data to any third parties. In particular, we do not provide your personal data to third parties for marketing purposes.

5. Where Your Personal Data Is Stored

Your personal data may be transferred to and stored outside the European Economic Area (EEA) and/or the USA, and processed by individuals outside the EEA and/or the USA who work for us, a member of our corporate group, or one of our business partners, service providers, or sub-contractors. By providing us with your personal data, you consent to such transfer, storage and processing.

6. Third Parties and Security

The Site contains links to third party websites and refers to third party service providers and other entities. If you follow a link to any third party website or deal with any third party entity referred to on the Site, then you should note that these third parties will have their own privacy and cookie policies, and that we are not responsible for their use of any personal data which you may provide to them. You should ensure that you have read and understood any relevant policies.

Although we do our best to ensure the security of personal data provided to us (and to use only reputable

service providers), any transmission of data via the Internet is by its nature insecure and we cannot guarantee the security of any personal data you provide to us. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or disclosure.

Where we have given you (or where you have chosen) a password or login information which enables you to access certain parts of the Site, or Edison, you are responsible for keeping this password or login information secure and confidential and must not share it with anyone.

7. Your Rights

Under the Regulation you have the right to access any information held by us about you. In order to exercise that right, please contact us at support@perspectum-diagnostics.com or otherwise at our postal address.

You also have the right to ask us to stop processing your personal data (and in particular not to use it for marketing purposes or to provide you with news). You can exercise that right at any time by contacting us.

8. Cookies

Edison uses cookies. A cookie is a file which is stored on the device which you use to access the Site or Edison. You can read more about cookies at <http://aboutcookies.org>. The cookies we use allow us to monitor the use of Edison and to improve our service offering. We use these kinds of cookies:

Strictly Necessary Cookies: These are required for the operation of Edison and allow you, for instance, to log into areas which require any form of log-in.

Analytical/Performance Cookies: These allow us to recognise and count visitors to or users of Edison and analyse their actions and movements on Edison. This helps us improve Edison (for instance by ensuring that users can find key functions easily).

Functionality Cookies: These are used to remember visitors and users to Edison and choices they have made, allowing us (for example) to personalise content and remember preferences.

9. Blocking Cookies

You may block cookies by activating settings on your browser which allow you to refuse the setting of some or all cookies. If you choose to block all cookies (including essential cookies) you may not be able to access all or some parts of Edison.

Most cookies we use are known as session cookies. These cookies will expire whenever you close your browser or shut down your computer, and such cookies need not be blocked. Other cookies used for specific purpose will expire when that purpose is no longer required.

You can find out more about blocking cookies in specific browsers at <http://aboutcookies.org>.

10. Contact Us

If you have any questions, comments or requests regarding this Privacy and Cookie Policy or our use of any personal data you provide to us, please contact us at support@perspectum-diagnostics.com.