

Edison

Privacy and Cookie Policy

PDM203

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Welcome to our Privacy and Cookies Policy

At Perspectum Diagnostics Ltd (“we” or “us”), we are committed to safeguarding your privacy.

This policy applies to users (“you”) of our cloud-based customer portal, Edison. It explains how we process your personal data (your “information”), sometimes called personally identifiable information, and our use of Cookies.

Please read this policy

We recommend that you read this information and ensure you understand the rights and responsibilities described. If you are a registered user of Edison additional terms of use will apply, which we recommend you also read.

Who is responsible for this policy?

For the purposes of data protection laws, the data controller of your information 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.

What information could we collect

We may collect your information:

- if we register you as a user of Edison
- if you correspond with us
- if you provide information to us via Edison from time to time

Types of information

Information we collect, retain and use about you may include name, email address, telephone number and other contact details, individual passwords and logins, and any other personal information you provide to us.

If you provide us with any information relating to any other person, you confirm that you have obtained that person’s consent to the disclosure for our use in accordance with this policy.

Technical information

We may also collect, retain, and use certain technical information. This may include your Internet Protocol (IP) address and non-identifying information regarding your use of Edison (including browsing and click-stream activity and your chosen browser and internet service provider).

Patient Data

Unless we have expressly agreed with you or your employer to the contrary, you must not submit information which identifies your patients or study participants.

We require that patient information is de-identified. 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 us to identify any individual.

If we do accept identifiable personal data we shall process it in accordance with all applicable laws, including, where relevant, the General Data Protection Regulation 2016, Data Protection Act 2018, and the Health Insurance Portability and Accountability Act 1996. We confirm that we shall only process the data for the purposes of providing our services.

Our use of your information

We use your information in accordance with:

- our legitimate interests, including providing, and controlling access to, our services; and
- any contracts we have agreed with you or your employer, including exercising our legal rights.

We may notify you of news relating to our business, or to any of our products and services which are similar to those which you or your employer has previously purchased or previously enquired, unless you ask us not to.

Sharing Your Personal Data

The Perspectum Group

Where necessary to provide our services, we may share your information with any member of our group of companies from time to time. Companies in our group include: Perspectum Diagnostics Ltd, Perspectum Asia PTE Ltd and Perspectum Diagnostics Inc.

Our Business Partners

We may also share your information with business partners, service providers, and sub-contractors but only to the extent necessary for the performance of our services.

Our service providers include (without limitation):

- Amazon Web Services, who provide us with hosting services
- 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
- 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 service provider may provide your information to their service providers to receive necessary support functions (for instance, the third parties who host their servers).

Third Parties

We may disclose your information to third parties, including (without limitation):

- 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)
- 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 organisations for the purposes of fraud protection and credit risk reduction

No third-party marketing

We do not provide your personal data to third parties for their marketing purposes.

Where Your Information Is Stored

Your information 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 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.

We will only use providers who put in place appropriate technical and organisation measures to protect your information.

Third Parties and Security

Edison 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, note the third parties will have their own privacy and Cookie policies, and we are not responsible for their conduct. You should ensure that you have read and understood any relevant policies.

Nature of the internet

We do our best to ensure the security of personal data provided to us and use reputable service providers, however transmission of data via the internet is by its nature insecure and we cannot guarantee the security of your information. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access or disclosure.

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

Your Rights

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 at our postal address, addressing the letter for the attention of our Data Protection Officer.

You also have the right to ask us to stop processing your information (and in particular not to use it for marketing purposes). You can exercise that right at any time by contacting us using our details shown above. If you have any concerns about our use of your information, please get in touch and we will do our best to provide a resolution. If we are unable to, you may contact the Information Commissioner's Office, or equivalent data protection regulator if you are not based in the EEA.

Cookies

Edison uses Cookies. A Cookie is a file which is stored on the device you use to access Edison. You can read more about Cookies at <http://aboutcookies.org>.

We use Cookies to monitor use of Edison and to improve our services, including:

- **Strictly Necessary Cookies:** Required for the operation of Edison and to allow you, for example, to access areas which require log-in
- **Analytical/Performance Cookies:** Allow us to recognise and count visitors and users, and analyse their actions and movements. This information helps us improve our services
- **Functionality Cookies:** Used to remember visitors and users and choices they have made, allowing us (for example) to personalise content and remember preferences

You may block Cookies by activating settings on your browser. If you choose to block all 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.

Want to block Cookies?

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

Contact Us

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