



PRIVACY STATEMENT

1. INTRODUCTION

Blue Earth Therapeutics respects your privacy and is committed to protecting your personal data. This privacy statement sets out how we use and protect your personal data that you or others provide to us, including data from your use of our website and tells you about your privacy rights and how the law protects you.

Purpose of this Privacy Statement

This privacy statement aims to give you information on how Blue Earth Therapeutics collects and processes your personal data through your use of this website, including any data you may provide through this website when you fill out a Contact Form; use the website to message any of our staff; contact us by phone to request information on our products and services (e.g., request a reader training session); make an application for employment with us; if you reply to our direct marketing campaigns (e.g., filling in a response or contact form); if you report an adverse event to us; when we scan your badge at our symposia; or when you register to receive information on goods and services (e.g., marketing).

This website is not intended for children and we do not knowingly collect data relating to children. If you are under 16 please do not provide information to us unless you have the permission of a parent to do so.

It is important that you read this privacy policy, together with any other privacy policy 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 policy supplements any other such notices and is not intended to override them.

Controller

Blue Earth Therapeutics will be the controller for your data when you interact with us. This means that we are responsible for deciding how we hold and use personal information about you. Blue Earth Therapeutics is responsible for this website.

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Protection Officer using the details set out below.

Contact Details

Full name of legal entity: Blue Earth Therapeutics Limited

Email address: dataprivacy@blueearthtx.com

Postal address: Blue Earth Therapeutics Limited, The Oxford Science Park, Magdalen Centre, Robert Robinson Avenue, Oxford, OX4 4GA
ICO registration number: ZB552616

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Version of our Privacy Policy

This version of our Privacy Policy was updated on 10th April 2024.

Your Duty to Inform Us of Changes

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.

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 statement of every website you visit.

2. THE DATA WE COLLECT

Personal data, or personal information, means any information about a living 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, last name, title, username or similar identifier, date of birth and gender
- **Contact Data** includes email address, employer/academic institution and position, invoice address and telephone number
- **Financial Data** includes bank account details
- **Transaction Data** includes details about payments to and from you
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- **Profile Data** includes your purchases or orders made by you, your interests, preferences, feedback, username, and password
- **Usage Data** includes information about how you use our website, products, and services
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data by law, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data (so that it can directly or indirectly identify you), we treat the combined data as personal data, which will be used in accordance with this privacy statement.

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

If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you, but we will notify you if this is the case at the time.

3. HOW YOUR PERSONAL DATA IS COLLECTED

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms, at in-person events, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you do any of the following.
 - Negotiate and/or enter into a contractual arrangement with us
 - Request information be sent to you
 - Give us your business card
 - Request that we contact you
 - Apply to work for us
 - Give us feedback

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [Cookie Policy](#) for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Identity and Contact Data from publicly available sources such as Companies House
- Contact, Financial and Transaction Data from
- providers of technical and payment services such as banks

4. HOW WE USE YOUR INFORMATION

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

- Where you have consented to the use (you will have been presented with a consent form and you may withdraw your consent at any time by contacting the DPO – please see the Contact Section)

Click [here](#) to the ICO website and find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which We Will Use Your Personal Data

We have set out in the table below, a description of the ways we plan to use your personal data, depending on the type of data subject you are, 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 contact us 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 below.

Data Subject	Purpose/Processing Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
Applicants for Employment	To contact you about your application for employment or to answer any questions about roles with us	(a) Identity (b) Contact	Necessary for our legitimate interests (as it would be beneficial to us to appoint someone to that role)
Marketing Email Subscribers	To contact you with news, events, potential scientific collaborations, services, and research updates that may be of interest to you	(a) Identity (b) Contact (c) Marketing and Communications (d) Technical Usage Profile	Necessary for our legitimate interests (to develop our services and grow our business) Consent to receive marketing emails
Suppliers, collaborators, service providers and customers	To manage our relationship with you To manage payments, fees, and charges, if any	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
Health Care Professionals	To manage our relationship with you. To provide you with a service and respond to queries, and requests for information relating to our products. To	(a) Identity (b) Contact (c) Financial (d) Marketing and Communications (e) Professional details including qualifications	Performance of a contract with you Necessary for our legitimate interests to comply with a legal or regulatory obligation.

	comply with a legal or regulatory obligation.	(f) Transfer of Value related information.	Consent to receive marketing emails in your area of interest
IIT Investigator (Investigator Initiated Trial)	To process your request for IIT support. To manage our relationship with you. To ensure that we provide you with information that is relevant to your interest, expertise and preference.	(a) Identity (b) Photographs of you (b) Contact (c) Financial (c) CV (d) Professional details including qualifications (e) Medical License (f) Information about your use of our information and communication systems. (g) details of interactions with us. e.g. meetings we have held.	Performance of a contract with you. Necessary for our legitimate interests to comply with a legal obligation. Necessary for public interest or official purposes. Necessary for the protection of your interests (or someone else's interests)
Event Attendees	To administer the event	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)
Website visitors	To notify you about changes to our terms or privacy statement To ask you to provide feedback or input	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to understand how you use our services and website)
	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	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
	To deliver relevant website content to you and measure or	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers

	understand the effectiveness of the content we serve to you	(d) Usage (e) Marketing and Communications (f) Technical	use our services and to develop them, to grow our business and to inform our marketing strategy)
	To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want, or what may be of interest to you. This is how we decide which events, news, information, or services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information or services from us, or if you provided us with your details through the website or at an event and, in each case, you have not indicated a change to your marketing preferences. You will not receive marketing communications from us as a non-corporate subscriber unless you have 'opted-in' to receive such communications.

Third-Party Marketing

We will not share your personal data with any company outside Blue Earth Therapeutics for marketing purposes, unless you specifically request that we do so.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

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 would like 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 share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. "Third parties" includes the following:

Internal Third Parties

Other companies in the Bracco group acting as joint controllers or processors and who are based inside or outside the EEA and provide services to Blue Earth Therapeutics, including IT and system administration services, and for the purpose of leadership reporting.

External Third Parties

- Service providers acting as processors based inside and outside the EEA
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers based inside and outside the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based inside and outside the EEA who require reporting of processing activities in certain circumstances.
- Third-party service providers, acting as processors, (including contractors and designated agents) and other entities within our group based both inside and outside the EEA; professional advisors, acting as processors or joint controllers, based both inside and outside the EEA; HM Revenue & Customs, the Information Commissioner's Office and other regulators and authorities, acting as processors or joint controllers, based both inside and outside the EEA.

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 share your personal data within the Bracco Group. This will involve transferring your data outside the UK. We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA SECURITY

We have implemented technical and organisation security measures to protect your personal information against manipulation, loss, destruction, and access by third parties.

When we use a third-party service provider, that provider will be carefully selected and required to use appropriate measures to protect the confidentiality and security of personal information. We use a variety of security technologies and procedures to help protect personal information from unauthorised access, use or disclosure. 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.

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

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.

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 the Information Commissioner's Office website (www.ico.org.uk) to find out more about these rights:

- [Right of access](#)
- [Right to rectification](#)
- [Right to erasure](#)
- [Right to restrict processing](#)
- [Right to data portability](#)
- [Right to object](#)

If you wish to exercise any of the rights set out above, please contact us.

No Fee Usually Required

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.

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.

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.

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