
THERIUM ACCESS.

Website Privacy Policy

1 March 2019

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Introduction

Welcome to the Therium Access' privacy policy.

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

Please use the *Glossary* below to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Therium Access collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or contact us.

This website is not intended for children and we do not knowingly collect data relating to children. Where a case or project involves children, wherever possible we ask that data relating to them is anonymised.

It is important that you read this privacy policy 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 policy supplements the other notices and is not intended to override them.

Controller

Therium Access Limited (referred to below as "Therium Access," "we," "us" or "our") is the controller and is responsible for your personal data and this website.

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

Contact details

Our full details are:

Full name of legal entity: Therium Access Limited

Name and title of data privacy manager: Emma Naisbitt

Email address: contact@theriumaccess.org

If you have any queries about this policy, or our privacy practices, please do not hesitate to contact our data privacy manager using the details above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) if you are based in the UK (as the UK supervisory authority for data protection issues, www.ico.org.uk), or the Office of the Information Commissioner if you are based in Jersey (as the Jersey supervisory authority for data protection issues, www.oicjersey.org). We would, however, appreciate the chance to deal with your concerns before you approach the regulator so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

This version was last updated on 1 March 2019 and historic versions can be obtained by contacting us at contact@theriumaccess.org. 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 notice or policy 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 as follows:

- **Identity Data** includes organisation name, first name, last name and title.
- **Contact Data** includes postal address, email address, telephone numbers, website address and social media accounts.
- **Technical Data** includes internet protocol (IP) address, your login data, 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 interests, preferences, applications you have made or which have been made on your behalf, feedback and survey responses.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may also collect and use **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 in law as this data will **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 policy.

We do not usually 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) unless it is specifically relevant and an integral part of your Application, case and/or project that we are looking at funding. We will collect information about criminal convictions and offences and bankruptcy or insolvency status, however this will only be used to evaluate applications for funding and not for any other purpose.

3. How is your personal data collected?

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

- **Direct interactions.** You or your authorised legal representatives may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our newsletter or other publications;
 - request marketing to be sent to you;
 - enter a survey; or
 - give us some 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 and other similar technologies. Please see our Cookie Policy for further details.
- **Publicly available sources.** We may receive personal data about you from various publicly available sources, such as Identity and Contact Data from third party websites and/or from third parties authorised by you to make applications for a grant award on your behalf.
- **Technical Data** may be obtained from analytics providers, such as Google based outside the EU.

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 (e.g. a Grant Award agreement).
- 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.

We have set out below more detail about the types of lawful basis that we will rely on to process your personal data.

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. You have the

right to withdraw consent to marketing at any time by contacting us at contact@theriumaccess.org.

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 contact us at contact@theriumaccess.org 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <p>(a) notifying you about changes to our terms or privacy policy</p> <p>(b) asking you to confirm your interest in certain content, your Application or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (e.g. Grant Award Agreement)</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how visitors use our website)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how visitors use our website, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, visitor relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of visitors to our website, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To evaluate your Application for funding</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p>	<p>Performance of a contract with you (i.e. Application evaluation for eligibility for a Grant Award agreement or performance of the Grant Award agreement itself)</p>

	(d) Special Categories of Data	
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

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

You will receive marketing communications from us if you have requested information from us or if you otherwise provided us with your details and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third-party for marketing purposes.

Opting out

You can ask us (or third-parties) to stop sending you marketing messages at any time by contacting us at contact@theriumaccess.org.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us for a different purpose.

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 the Cookie Policy on our website.

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 at contact@theriumaccess.org.

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 described in the *Glossary*).
- External Third Parties (as described in the *Glossary*).

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 may share your personal data within the group of companies to which Therium Access belongs (e.g. for the purposes of evaluating an Application for a Grant Award). In certain circumstances, this may involve transferring your data outside the European Economic Area (**EEA**).

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

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see the section on the European Commission website (www.ec.europa.eu) entitled 'Adequacy of the protection of personal data in non-EU countries'.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see the section on the European Commission website (www.ec.europa.eu) entitled 'Model contracts for the transfer of personal data to third countries'.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see the section on the European Commission website (www.ec.europa.eu) entitled 'EU-US Privacy Shield'.

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

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 is reasonably necessary to fulfil the purposes

we collected it for, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe litigation may be in prospect in relation to our relationship with you for any reason.

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, regulatory, accounting or reporting requirements.

Please contact us at contact@theriumaccess.org for details of retention periods for different aspects of your personal data.

In some circumstances you can ask us to delete your data: see the *Request Erasure* section in the *Glossary* 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 the following rights under data protection laws in relation to your personal data.

- To request access to your personal data.
- To request correction of your personal data.
- To request erasure of your personal data.
- To object to processing of your personal data.
- To request restriction of processing your personal data.
- To request transfer of your personal data.
- To withdraw consent.

Please see the *Legal Rights* section of the *Glossary* below to find out more about these rights.

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

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.

10. Glossary

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 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 at contact@theriumaccess.org.

Performance of a 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 (e.g. a Grant Award Agreement or the application for the same).

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

Third-Parties

Internal Third-Parties

Other companies in the group of companies of which Therium Access is a part of acting as joint controllers or processors and who are based in the United Kingdom, Jersey, the USA, Germany, Norway, Australia and Luxembourg and provide services to Therium Access.

External Third-Parties

- Service providers acting as processors based in the United Kingdom, Jersey, the USA, Germany, Spain, Italy, Norway, Australia and Luxembourg who provide IT, system administration and marketing services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom, Jersey, the USA, Germany, Spain, Italy, Norway, Australia and Luxembourg who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities acting as processors or joint controllers based in the United Kingdom, Jersey, the USA, Germany, Spain, Italy, Norway, Australia and Luxembourg who require reporting of processing activities in certain circumstances.
- Advisory Committee members and Board members whose job it is to evaluate and approve or reject applications for grant funding, based in the UK and Jersey.

Your Legal Rights

You have the right to:

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.

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.

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.

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.

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 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.

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.

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.