

Privacy policy

This Privacy Policy sets out the basis on which Cumulus Oncology will process Data which we collect from users of our website <https://cumulusoncology.com>. This Policy applies to use of any and all Data collected by Cumulus Oncology through users' interactions with the website.

This policy does not cover data collected from our other products, applications or services.

Cumulus Oncology is a "Data Controller" with respect to Your Data. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

Your Data

Your 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). Examples of Your Data include, but are not limited to, Your name, telephone number, e-mail address, coarse location (you network provider's location) and IP address information.

Data Collection

We may collect the following Data about you or your interaction with our website:

- Data from you if you choose to contact us via the website form and the careers application form. If applying for a career with us, you will directly supply us with your first name, last name, email address and CV.
- Data that is collected automatically from your usage of our site. This data is transmitted from your browser and includes your IP address, the date and time of the visit, the pages you accessed, the access status/HTTP status code, your browser type, your operating system/interface, and the language of your browser.

How we use Your Data

We will only use Your Data when the law allows us to. Most commonly, we will use Your Data in the following circumstances:

1. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.
2. Where you have consented for us to do so e.g. through an employment application.
3. We may also use your Data in the following situations, which are likely to be rare:
 1. Where we need to protect your interests (or someone else's interests).

2. Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information in the Data Collection section above primarily to allow us to improve our website and to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process Your Data are listed below.

- To conduct data analytics studies to test, review and better understand the use of our website so that we can improve it.
- To monitor your use of our website to ensure compliance with our use policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To contact you, where you have requested us to do so, either in line with a query you have submitted or an employment application via our careers pages.
- To consider your employment application in line with our employment policies (a separate document is available upon request)

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Change of purpose

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated Decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you or update this policy if this position changes.

Retention of Your Data

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of supporting our website, correcting bugs or other errors discovered from time to time.

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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Links to other websites

Cumulus Oncology's website may provide links to other websites; we are not responsible for the way in which your data may be used respectively. This Privacy Policy does not extend to those external sites.

Cookies

This website may place and access Cookies on a user's computer. We use Cookies to improve your experience in using our website. We have carefully chosen these Cookies, and have taken steps to ensure that your privacy is protected and respected at all times, in accordance with legal requirements.

Before the website places Cookies on your computer, you will be presented with pop-up banner requesting consent to enable Cookies. By providing consent to placing of cookies, this enables us to provide a better experience and service to you. We consider that you have provided consent for cookies when a visitor takes one of the following actions:

- Navigating past your consent notification
- Dismissing your cookie banner
- Clicking your "I agree" button

This website may place the following cookies:

1. **Strictly necessary cookies:** These are cookies that are required for the operation of our website and will always be enabled i.e. you cannot turn them off.
2. **Cookies enabling visitor analysis:** These allow recognition and count of the number of visitors, and to see how visitors move around the website when they are using it. This helps us to improve the way our website works, for example by ensuring that users are finding what they are looking for easily. We have a 'self set' cookie enabled which allows us to keep track of users accepting or denying the Google Analytics cookie; more on this below.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site may use Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page. You can either accept or deny this cookie.

You may enable or disable Cookies in your internet browser(s). By default, most internet browsers accept cookies, but this can be changed.

Security of Your Data

We have put in place both technical and procedural measures to protect the security of your data. Details of these measures are available on request.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your Rights Of Access, Correction, Erasure, And Restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us e.g. during an employment application.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to

establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact www.cumulusoncology.com/contact

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Changes To This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact www.cumulusoncology.com/contact