



## **ADNOVATE CLINICAL DEVELOPMENT STRATEGIES LTD. DATA PRIVACY POLICY**

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of Your information when you use our services and tells you about Your Privacy Rights and how the law protects You.

### **1) Privacy Statement and Controller contact details**

Adnovate Clinical Development Strategies Ltd is the controller for the personal information we process, unless otherwise stated. You can contact our Executive Administrator via email at [execadmin@adnovateclinical.com](mailto:execadmin@adnovateclinical.com).

We take privacy and the protection of personal and sensitive information seriously and are committed to protecting your data and complying with the data regulations to their full extent. Our Privacy Policy explains how we use and protect your personal information, to show that we are adhering to the GDPR/UK GDPR and are guided by the data protection principles within that legislation.

In summary, these principles require that personal data is:

- Processed fairly, lawfully and in a transparent manner.
- Data is used only for limited, specified stated purposes, and is not used or disclosed in any way incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and, where necessary, up to date.
- Not kept for longer than necessary
- Stored and processed safely and securely.

## **2) Policy Scope and ICO Registration**

This Privacy Policy applies to information we collect about individuals who interact with our organization. It explains what personal information we collect and how we use it. The UK GDPR requires every organization that processes personal information to be registered with the Information Commissioner's Office (ICO). Our registration number is ZB331462 and you can find us on the Information Commissioner's register and search for us by using our registration number.

## **3) Our promise to You**

- We will keep your personal information secure and confidential
- You are in control of how we communicate with you – you can opt in or out or change your preferences at any time.
- We will not sell your data to a third party.
- We will not swap your data with a third party.
- We will ensure our staff are aware of how to manage your information appropriately and in line with regulations.
- We pass information to trusted partners to do some specialist processing work e.g. invoicing and financial transactions. All these companies comply with Data Protection laws.

#### **4) Personal Data that we process**

Information we collect and store depends on the service you have requested or how we will be interacting with you. We always aim to collect the minimum data necessary for the purpose of the services requested. For more information about the individual categories and purposes of data we collect including the legal basis of processing please see below.

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Service enquiry
  - Contracting our services
  - You have applied for a job or consultancy opportunity with us
  - You are representing your organization
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- Enquiring about our services

If you enquire about our services we will collect your name, email address, telephone number, organization you work for, your Job title and your message.

This will be collected either via email or telephone depending on your preferred contact method. As it is necessary for us to collect that data to enable us to respond to your enquiry in the way you would expect we have a legitimate interest to process that data. You can request for your information to be deleted at any time, however we might not be able to provide you with our services or a reply if you request deletion.

- Contracting us

If you do take one of our service offerings we will be entering into a contractual relationship with you and our legal basis for processing will be contract. We will collect your organization's details, your contact details and any details of contacts you provide us with to enable us to fulfil our contractual obligations towards you. In addition we will process commercial, confidential and sensitive information that you provide us with for the purposes specified in the contract and data processing agreement. We will also process financial details for the purpose of invoicing and financial transactions.

- Employment and Consultancy opportunities

Our purpose for processing information in relation to job and consultancy opportunities is to assess your suitability for a role you have applied for within Adnovate Clinical Development Strategies Ltd or to assess your suitability to provide a consultancy service to our clients and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal information relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010 the lawful basis we rely on for processing this information is to comply with our legal obligations under the UK GDPR.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information relates to our obligations in employment and the safeguarding of your fundamental rights and the processing for employment purposes.



<b>Types of personal data we may collect and store</b>	<b>Primary Purpose for collection and use of data.</b>
General employee data including but not limited to full name, title, contact address, telephone numbers, email addresses, date of birth, gender and National Insurance/social security number, evidence of right to work, medical information, disability information (where applicable).	We have a legitimate interest in using your information to support business and administration functions.
Financial information including bank account details, payroll and share plan records and tax status information.	We use this data to administer the contract we have entered into with you e.g., to pay you.
Career history data including but not limited to former employers, work experience, length of time in role(s) and business(es). Education data including curriculum vitae/resume details, qualifications, areas of expertise, training history, professional memberships and honours and awards.	We will share this information with clients with whom we wish to provide client services to assess qualifications/experience for a particular job or task (to pursue legitimate business interest). We also obtain details about education, training to assess for development requirements and decisions about promotions. We may also use this data for recruitment purposes.



<p>Position information including job title, employee number, role and function, work history, working hours, annual leave and other leave entitlement, details about absence from work, employee claims, complaints and disclosures information, training records, reporting structure, date of hire, notice period, departments, salary details, pay grade, pension and benefits information. Responses to internal surveys. Details of any absences (other than holidays) from work including time on statutory parental leave and sick leave.</p>	<p>Conduct performance reviews, managing performance and determining performance requirements. Make decisions about salary reviews and compensation. Ascertain your fitness to work. Manage sickness absence.</p>
<p>Information about your use of our information and communications systems including IP address. System and resource access and usage activity.</p>	<p>Monitor your use of our information and communication systems to ensure compliance with our IT policies. Ensure network and information security, including preventing unauthorized access to our computer and electronic communications system.</p>
<p>Where authorized by law and consent provided voluntarily we may also collect, store and use the following "special categories" of personal data, including information about: Your race or ethnicity, religious beliefs, sexual orientation and political opinions.</p>	<p>Undertake equal opportunities monitoring.</p>



Adnovate Clinical Development Strategies Ltd limit access to your personal information to those employees, 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.

## **5) Cookie Policy**

### Cookies and usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket and counting the number of people looking at a website. We use Google Analytics for this purpose.

Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available [here](#).

### Cookies we use -

#### Essential Cookies

These cookies enable core functionality such as security, verification of identity and network management. These cookies can't be disabled.

#### Marketing Cookies

These cookies are used to track advertising effectiveness to provide a more relevant service and deliver better ads to suit your interests.

#### Functional Cookies

These cookies collect data to remember choices users make to improve and give a more personalised experience.

### Analytics Cookies

These cookies help us to understand how visitors interact with our website, discover errors and provide better overall analytics.

For all other cookies your informed consent is required by choosing your preference in the cookie setting pop up banner. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website.

### 6) International Transfers

When we are the data controller, we do not normally transfer personal data outside the EEA. However from time to time there may be a specific service need (e.g. clients are located outside of EEA). Where possible we will ensure that we put appropriate safeguards in place to secure this data transfer.

### 7) Information Sharing, Security and Retention

We will not share your information with any third parties for the purposes of direct marketing. We use data processors who are third parties who provide elements of services for us. We have contracts and data processing agreements in place with our data processors.

We have security controls in place which meet international business standards.

We conduct regular reviews to ensure we keep your personal information no longer than necessary.

### 8) Your Data Protection Rights

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this right here](#)





You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this right here.](#)

You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this right here.](#)

You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this right here.](#)

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests. [You can read more about this right here.](#)

Your right to portability only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organization to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. [You can read more about this right here.](#)



9) How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us via email at [execadmin@adnovateclinical.com](mailto:execadmin@adnovateclinical.com).

You can also complain to the ICO if you are unhappy with how we used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 030 123 1113