

MeOmics Precision Medicine Ltd
Data Privacy and Fair Processing Policy

Our contact details:

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Company registration number: 13767770

Registered address: International House, 10 Churchill Way, Cardiff, CF10 2HE

Registration number with the ICO: ZB421823

Introduction and General Terms

We are committed to protecting your personal information, and you can be assured that it will only be used in accordance with this Privacy Notice. This Privacy Notice relates to our use of your personal information when we contact you, or you contact us in relation to our services/research. We may contact you to provide you with the full range of services, and we sometimes need to collect information about you. This Privacy Notice explains the following:

- What information we may collect about you and the legal basis for doing so.
- The source of where we receive personal information.
- How we will use information we collect about you and why.
- How long we will retain your personal information.
- Whether we will disclose your details to anyone else.

We are committed to safeguarding your personal information. We are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, these laws are referred to collectively in this Privacy Notice as "data protection laws".

Who are we?

MeOmics is a bio-tech company, focused on developing academic research to provide a Precision Psychiatry Platform for improved drug discovery and prediction of optimal therapies for patients. MeOmics is Ualask-based and is funded by UKRI and private investors. When we refer to "we" or "our", we are referring to MeOmics. MeOmics Precision Medicine Ltd is registered with the UK Information Commissioner's Officer, registration reference: ZB421823.

The type of personal information we collect.

To provide services and communications either to address your needs or to carry out research to improve the diagnosis and treatment of mental health illnesses, we require information about you. For the purposes mentioned in this Privacy Notice, we collect and hold information for the following groups:

- A. **Employees (current, former and applicants).** This will include *Personal Data* (e.g., name, age, company, address, telephone number, email address, IP address, location, conversations (e.g., video conference meetings & chat) and other information when making an application for a role within MeOmics. This may include **special personal data** (e.g., race, ethnic origin, religious or philosophical beliefs and reasonable adjustments you require under the Equality Act 2010).
- B. **Customers, potential customers and suppliers.** This will include some personal data required for business transactions, such as customer information (e.g., name and contact details), suppliers list and data from cookies.
- C. **Clinical and demographic data relating to individuals who have donated cells to MeOmics.** This data will be supplied to the company from third-party institutions (“donating Institutions”) as de-identified data that is labelled with a unique ID number. The ID number provides the link to the donor’s cell samples. The de-identified data will be supplied to MeOmics only where there is informed consent, a record of which is held by the donating institution. MeOmics will not be able to reidentify an individual donor. The de-identified data will be used for population-level modelling and processing to stratify clinical populations to improve the testing of drugs for mental illnesses. De-identified data remains in the scope of the UK GDPR legislation; however, once the key that links the unique ID number to the donor has been deleted by the donating institution, re-identification will be virtually impossible; at this point, the data will be considered as effectively anonymised.

Lawful Basis for Processing

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

Data Grouping	Lawful Basis	Data Retention
A	<p>The lawful bases for processing are set out in Article 6 of the UK GDPR:</p> <p>(a) Consent: the individual has given clear consent to process their personal data for a specific purpose.</p> <p>(b) Contract: the processing is necessary for a contract with the individual, or because they have</p>	<p>We will hold your personal data on our systems for as long as is necessary to maintain our relationship. Unless you choose to withdraw your personal details before this time, your personal data will be held in accordance with our data retention policy, unless</p>

	<p>asked you to take specific steps before entering into a contract.</p> <p>(c) Legal obligation: the processing is necessary for you to comply with the law.</p>	<p>required to be retained longer by law.</p>
B	<p>The lawful bases for processing are set out in Article 6 of the UK GDPR:</p> <p>(a) Consent: the individual has given clear consent to process their personal data for a specific purpose.</p> <p>(b) Contract: the processing is necessary for a contract with the individual, or because they have asked you to take specific steps before entering into a contract.</p> <p>(c) Legal obligation: the processing is necessary for you to comply with the law</p>	<p>We will hold your personal data on our systems for as long as is necessary to maintain our relationship. Unless you choose to withdraw your personal details before this time, your personal data will be held in accordance with our data retention policy, unless required to be retained longer by law.</p>
C	<p>Under Article 6 (1) (f): We have a legitimate interest in processing and retention of this data because it is necessary to achieve the objectives of our research.</p> <p>Article 9(2)(a) permits us to process special category data, because the data subject has given explicit consent to the processing of pseudo-anonymised data with potential linkage to personal data held by the donating institute for the specific purpose of research into neuronal cells and who have completed an express statement of consent to participate in the research.</p> <p>Article 9 (2) (i): Processing is necessary for reasons of public interest in the area of public health, such as protecting against ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of UK law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject.</p>	<p>We will keep your de-identified data in perpetuity or until the corresponding iPSC is destroyed.</p> <p>We do not hold the key that links the de-identified clinical and demographic data to a named individual, so are unable to delete information for a specific person.</p>

	<p>Article 9(2)(j): Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes and complies with Article 89 (1) of the UK GDPR.</p> <p>We also rely on the Data Protection Act 2018, Schedule 1, which describes conditions for processing in:</p> <p>Part 1 which describes conditions for processing personal data for health, public health, social care, and research purposes and;</p> <p>Part 2 sets out the conditions for processing personal data on the grounds of substantial public interest.</p>	
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How we store your personal data?

We securely store personal information on cloud servers provided to us by Google. Details on the security features of Google Cloud can be found at this link: <https://cloud.google.com/trust-center>.

Who do we share your data with?

With reference to data groupings A & B in the table above, we will keep your personal data within MeOmics and will only share it where you have requested it, required by law, or given your consent. Where we use data processors who are third parties who provide services for us, we will have contracts in place that mean they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

With reference to data grouping C in the table above, we will only share aggregated or summary data with medical companies and scientific organisations. Aggregated data only will be shared, no individual-level data will be shared.

Sending data outside the UK

The UK now controls our own data protection legislation and regulations (since leaving the EU). We ensure our data protection regime is as good as it can be in line with the UK Government's Ten Tech Priorities. We fully support a world-leading digital economy and society whilst underpinning the trustworthy use of data.

We may transfer personal information relating to Groups A and/or B to countries outside of the United Kingdom ("UK"), which may not have the same data protection laws as those of the UK. Where we transfer personal information relating to these Groups to countries outside of the UK, we will take appropriate steps to ensure the personal information is afforded the same level of protection as required by the UK

GDPR regulations and ICO recommendations regarding the data protection laws of those countries. No personal data from Group C will be sent outside of the UK. We rely on adequacy decisions or any adequate data transfer mechanisms, in line with Section 109 of the Data Protection Act 2018.

Your data protection rights.

Under the UK General Data Protection Regulations (UK GDPR), you have the following rights:

Your right to be informed – You have the Right to request to be informed about the personal data we process in certain circumstances.

Your right of access – You have the right to request us for copies of your personal data in certain circumstances.

Your right to rectification – You have the right to request us to rectify personal data you think is inaccurate in certain circumstances. You also have the right to ask us to complete information you think is incomplete in certain circumstances.

Your right to erasure – You have the right to ask us to erase your personal data in certain circumstances.

Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Your right to object to processing – You have the the right to object to the processing of your personal data in certain circumstances.

Your right to data portability – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, the UK GDPR states that we have one month to respond to your verified request, unless our assessment of your request concludes to be complex. If that is the case, we will notify you without undue delay.

Please get in touch with us at info@meomics.tech, if you wish to make a request.

Cookies

When you interact with our website, we try to make that experience straightforward and meaningful. Cookies are small pieces of information that are issued to your computer or mobile device when you visit a website and that store and sometimes track information about your use of the website.

Some Cookies are strictly necessary to make our website available to you.

("Essential Cookies"). For example, to remember your consent and privacy choices. We cannot provide our Services without these Essential Cookies.

We also use Cookies for functional purposes in order to maintain and improve our services or improve your experience, and for marketing purposes (collectively "Nonessential Cookies"). Some of the Non-Essential Cookies used are set by us, to collect and process certain data on our behalf, and some are set by third parties and our Social Networking Services.

A banner is displayed giving a) clear information about the purpose, storage & access to the cookie and b) you have given consent in line with Article 4(11) of the UK GDPR, before it captures data. Further information in our cookies policy

How to complain

If you have any questions or concerns about how we use your data, contact our Data Protection Officer via email: info@meomics.tech.

If you are dissatisfied with the outcome of any review carried out by us in relation to information that we hold about you, you may wish to appeal to the UK Information Commissioner (ICO) who oversees the UK General Data Protection Regulations. If you wish to do this, please write to the Information Commissioner's Office as soon as possible after receiving the outcome of your review.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Changes to our Privacy Notice

This Privacy Notice may be updated from time to time so you may wish to check it each time you submit personal information to us. The date of the most recent revisions will appear on this page. If material changes are made to our Privacy Notice(s), for instance affecting how we would like to use your personal information, we will provide a more prominent notice.

Contacting us

If you have any questions or comments regarding the content of this Privacy Notice, please contact info@meomics.tech.

Document Control

Document Owner

Name	Title
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Adrian Harwood Director

Document approval

Approved assumes review undertaken prior to approval

Version	Date	Name	Title	Approval Status (Pending/Approved)
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