



Privacy Policy

Version date: May 2024

Contents

1	Policy Information	2
2	How we collect personal data.....	2
3	Personal data protection principles	2
4	What type of information is collected from you	3
5	How is your information used?	3
6	Who has access to your information	3
7	How you can access your information.....	3
8	How long is your data held by us?	4

1 Policy Information

This policy should be read alongside the company's Information and Data Protection Policy and Procedures, which describe how we process all confidential and sensitive data, including personal data, in line with current legislation.

This Privacy Policy sets out how we process personal data that may be provided to us by our clients, or directly from UK and EU citizens in the course of our business activities.

2 How we collect personal data

We collect personal data in a number of ways – by email, online forms, telephone, face to face, or in writing. This includes consent forms, surveys, interviews and workshops, and electronic media (such as databases and spreadsheets).

This may be when you have contact with a staff member of Apteligen, or a staff member of an organisation we are providing services to (our clients).

Before we collect any personal data we will ensure that you have provided explicit consent for us to collect it, including setting out the purpose for which it will be used, or that there is a lawful basis for it to be processed.

Our clients will typically only provide personal data to us if you have previously consented to this.

3 Personal data protection principles

We adhere to the principles relating to Processing of Personal Data set out in the UK GDPR which require Personal Data to be:

1. Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
2. Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
4. Accurate and where necessary kept up to date (Accuracy).
5. Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
6. Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
7. Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).

8. Made available to Data Subjects and Data Subjects allowed to exercise certain rights in relation to their Personal Data.

4 What type of information is collected from you

In order to fulfil our contractual obligations with our clients, we may hold the following information about you:

- Personal information: Your name, address, and contact details (including phone number and email address), and your views and opinions about certain issues
- Personal sensitive information: Demographic details such as age, gender and ethnicity, lifestyle and social circumstances, physical or mental health, employment, financial details, education and training details, financial details, religious or other Beliefs of a similar nature, and offences (including alleged offences).

5 How is your information used?

Your information is used solely to enable us to meet our contractual obligations with our clients. This includes for the purposes of research and evaluation. We may also use your personal details to contact you directly to invite you to take part in our work on a particular project, if you have previously consented for us to do this. You are free to withdraw this consent at any time.

We will only use your information for the project that your information relates to, and for no other purpose or for any other project or business activity. We will never use your personal data for marketing purposes.

6 Who has access to your information

Only the staff of Apteligen, our subcontractors, and our contracted third-party suppliers (such as cloud storage and online survey providers) will have access to the personal information we hold. All staff and subcontractors are bound by the policies and procedures we have in place to protect your personal data.

We ensure that any third party suppliers are fully compliant with current data protection law, including in cases where personal data may be transferred and stored outside the UK.

7 How you can access your information

If you would like to access a copy of the personal data we hold about you, email your request to corporate@apteligen.co.uk, or speak to a member of staff.

8 How long is your data held by us?

Your data will be held by us for as long as it is needed to fulfil our contractual obligations with a client.

It will then be kept for a period of up to two years in order to respond to any questions or disputes that arise in relation to the materials or deliverables connected with that contract.

Under the UK General Data Protection Regulation (GDPR) you can request for your data to be removed from our system at any time.