

Welcome to the HIVE BIO Life Sciences LTD and/or any related entities (hereinafter referred to as HIVE BIO) privacy policy.

We understand and respect Your privacy and are committed to protecting Your personal data. This privacy policy will inform you how your personal data is used and shared online and according to the agreement of services entered into with HIVE BIO.

We endeavour in respecting the value of the privacy of all who visit our website and enter into agreement for services provided by HIVE BIO and ensure that we only collect and retain personal data in ways described in this Policy, and in a manner that adheres with the Company's obligations and rights under the law. Under the General Data Protection Regulation 2016/679 (GDPR or Regulation) and other applicable legislation HIVE BIO is required to comply with data protection including procedures so as to ensure that your data is safeguarded at all times and processed in a manner that your rights are protected. HIVE BIO takes these obligations very seriously and ensures that it has taken all the technical and organisational measures to safeguard your privacy. HIVE BIO encourages you to read this Privacy Policy and make sure that you understand it. Prior to submitting an enquiry or engaging us for our services you shall be requested to read and accept this Privacy Policy. HIVE BIO strives to provide you with optimal service and shall ensure that it will abide by the legal requirements when doing so. Your non-acceptance of the Privacy Policy means that you decline submitting any queries or engage us for our services and you should stop using our website immediately. HIVE BIO understands the importance of the data subject's personal data and how it is used and shared online.

#### **Owner and Data Controller**

HIVE BIO is made up of different legal entities, of which HIVE BIO Life Sciences Ltd is the parent entity.. This privacy policy is issued on behalf of HIVE BIO so when we mention HIVE BIO, "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the HIVE BIO Group responsible for processing your data. We will let you know which entity will be the controller for your data when you provide data to us for a specific purpose.

HIVE BIO Life Sciences Ltd is the data controller of this website:

HIVE BIO Life Sciences LTD Company Number: 12533706

271 Royal College Street, London, England, NW19LU

Our privacy officer can be contacted by email at info@hive.bio or by Post at the address indicated above.

# Types of Data collected

The owner does not provide a list of Personal Data types collected.

Your personal data may be processed only if you have unambiguously given your consent or the processing is necessary for the performance of a contract to which you are party or in order for you to be able to enter into contract obligation or for compliance with legal obligations as in the case of Anti Money Laundering and Terrorist Financing Regulations (AML/TF) and any other interest carried out in the public interest or in the exercise of official authority vested in HIVE BIO or a third party with whom the personal data is disclosed except where such interest is overridden by the interest to protect the fundamental rights and freedoms that arise from the righty of privacy.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website. Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

### Mode and place of processing the Data

# Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

# Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

# **Download information**

When you visit our website, the following information will automatically be processed and this solely for the use of HIVE BIO:

- 1. The requested web page or download;
- 2. Whether the request was successful or not;
- 3. The date and time when you accessed the site;
- 4. The Internet address of the website or the domain name of the computer from which you accessed the site;
- 5. The operating system of the machine running your web browser and the type and version of your web browser and other similar security features which are used for authentication purposes and account access.

#### **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

#### **Data Retention**

HIVE BIO shall collect, process and retain personal data only for the extent necessary for the specific purposes for which You have been informed and for the retention period as specified under the heading "Data Retention".

HIVE BIO ensures that it will not retain your personal data for any longer than it is necessary and for the purposes for which the personal data was originally collected, retained and processed. When your personal data is no longer required we shall take all reasonable steps to ensure that all personal data retained is disposed of in a timely manner. Retention periods may vary between a few months with regard to simple enquiries to over ten years due to legal obligations which arise from different applicable laws and/or court orders.

#### Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

#### Cookies

Cookies are small pieces of data that the site transfers to the user's computer hard drive when the user visits the website. We use cookies to facilitate and improve your experience of our website and to improve our products and services. This website makes limited use of cookies.

## The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data
  and ask for it to be updated or corrected. HIVE BIO shall at your request immediately
  rectify, block or erase your personal data that has not been processed according to
  the GDPR and Data Protection Act or processed unlawfully and where applicable
  proceed with notifying any third party about the measures undertaken.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right
  to receive their Data in a structured, commonly used and machine readable format
  and, if technically feasible, to have it transmitted to another controller without any
  hindrance. This provision is applicable provided that the Data is processed by
  automated means and that the processing is based on the User's consent, on a
  contract which the User is part of or on pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

# Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this policy.

## **Data Portability**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this policy. These requests can be exercised free of charge, subject that it is not excessive and does not affect the right of other individuals' personal data and will be addressed by the Owner as early as possible and always within one month.

# Right to be forgotten

Upon request, you have the right to have your personal data erased by us. HIVE BIO acting as a controller will take all necessary actions (including technical measures) to inform third-party data processors to comply with the request unless your personal data needs to be retained to comply with legal obligations or court orders.

# Additional information about Data collection and processing

## Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

#### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

#### System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) and use other Personal Data (such as the IP Address) for this purpose.

# Response to personal data breach incidents

When we learn of a suspected or actual personal data breach, we shall perform an internal investigation and take appropriate remedial measures in a timely manner. Where there is any risk to your rights and freedoms, we shall notify the relevant Supervisory Authorities

without undue delay and, when possible, within 72 hours from when we learn of such breach.

## **Accountability**

HIVE BIO shall be responsible for and be able to demonstrate compliance with the principles outlined in this Privacy Policy.

### International data transfer

We shall ensure that before transferring personal data out of the European Economic Area (EEA), adequate safeguards will be used including but not limited to the signing of a Data Transfer Agreement/Addendum, as required by the European Union. Authorisation may be obtained from the relevant Data Protection Authority where required. Furthermore, the entity receiving the personal data shall comply with the principles of personal data processing set forth in Cross Border Data Transfer Procedure.

# How "Do Not Track" requests are handled

This Website does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

## Changes to this privacy policy

We may update this Privacy Policy from time to time in response to changing legal, technical and/or business development. If there are any changes to this Privacy Policy, we will replace this page with an updated version. When we update our Privacy Policy, we shall take appropriate action and inform you accordingly by a Privacy Notice consistent with the significant changes we would have made. However, it is in your own interest to check the "Privacy Policy" page from time to time by accessing our website so as to be aware of any changes which may have occurred.

### **Definitions and legal references**

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

## **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Website, the URI addresses (Uniform Resource Identifier),

the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Latest update: 07th September 2022