

BIOSCRIPT GROUP WEBSITE PRIVACY NOTICE

1 INTRODUCTION

1.1 Purpose of this privacy notice

- (a) This notice applies to personal data collected via our website <https://bioscriptgroup.com> and limited related interactions, e.g., enquiries and recruitment via the website.
- (b) It is important that you read this privacy notice carefully so that you are fully aware of how and why we are using your data.

We are committed to ensuring that your privacy is protected and we comply with the EU and UK General Data Protection Regulation and other applicable data protection rules (including the Data Protection Act 2018 and marketing and cookie laws, together with associated guidance) (the “Data Protection Laws”). We only collect personal data that is necessary for the purposes described in this notice.

1.2 Who this notice applies to

- (a) For the purposes of the Data Protection Laws, we are the data “controller” and we are responsible for the personal data of visitors of the <https://bioscriptgroup.com> website.
- (b) This privacy notice applies to:
 - users of our website
 - individuals who apply for jobs with us
 - individuals whose personal data we process in connection with our services.

1.3 Contact details

If you have any questions about this privacy notice or our privacy practices, please contact us at: DPO@bioscriptgroup.com

1.4 Changes to the privacy notice and your duty to inform us of changes

- (a) We keep our privacy notice under regular review.
- (b) It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.
- (c) We may update or amend this website and our Privacy Notice from time to time to reflect changes in our practices, legal requirements or for other operational, legal or regulatory reasons. We encourage you to review this page periodically to ensure that you are aware of any updates or changes. Your continued use of the website constitutes your acknowledgement of any such changes.

1.5 Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about

you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2 THE DATA WE COLLECT ABOUT YOU

2.1 Data categories

- (a) Personal data, or personal information, means any information about an individual from which that person can be identified, directly or indirectly.
- (b) We may collect, use, store and transfer different kinds of personal data about you that we have grouped together as follows:

- (i) **Identity data** includes first name, last name and title. This may be collected when you fill out a contact form or if you correspond with us on any matter.
- (ii) **Contact data** includes email address, postal address and telephone numbers, including the professional contact details of our business contacts and representatives of our suppliers.

- (iii) **Website data** includes:

- (A) **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- (B) **Usage data** includes information about how you use our website and any online surveys or facilities available on our website.

We collect some of the website data by use of cookies.

- (iv) **Marketing and communications data** includes your preferences in receiving marketing from us and your communication preferences. When you receive email communications (e.g., newsletters and other updates about our services), we may:

- (A) collect information from your **device** and **applications** used to view emails, including your IP address, device attributes (for example: hardware model, operating system, web browser version), connection information (for example, name of your mobile operator or ISP, language and time zone, and mobile phone number) and device information (for example, Wi-Fi information)
- (B) collect information from page tags (also known as web beacons or pixels) about **email engagement**, such as when you receive our emails, if and when you open our emails, how long you spend reading our emails and whether or not you click a link contained in our emails.

- (v) **Recruitment data** includes any personal data you may give to us as part of a recruitment process, including your identity data, contact data, your CV and your responses to application form questions or assessment questions. For some roles we may also be required to run a credit check and/or a disclosure check against you; however, you will be informed if this applies to you. This may involve the collection and use of information about criminal convictions and offences and may include information provided to us by third parties in the context of a credit check and/or a disclosure check (where applicable).
- (c) We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data that will be used in accordance with this privacy notice.
- (d) We do not collect any **special categories of personal data** about you through the website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Except in the context of recruitment data as noted above, we do not collect any information about criminal convictions and offences.

2.2 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to consider your job application or to respond to your enquiry).

3 USE OF ARTIFICIAL AND AUTOMATED TECHNOLOGIES

- 3.1 We may use artificial intelligence ("AI"), machine learning technologies, and other automated software tools provided by approved third-party service providers to support the delivery of our services, improve operational efficiency, enhance quality, conduct research and analysis, generate content, summarise information, manage knowledge, and assist with administrative, business, and technical activities.
- 3.2 Where such technologies process personal data on our behalf, they will do so under our instructions and subject to appropriate contractual, technical, and organisational safeguards designed to protect your personal data and maintain confidentiality.
- 3.3 The personal data processed through these technologies may include contact details, professional information, correspondence, publicly available information, and other personal data that is necessary for the relevant business purpose. We will take reasonable steps to ensure that only the minimum personal data required is processed.

- 3.4 We do not rely solely on AI systems to make decisions that produce legal effects concerning individuals or similarly significantly affect individuals. Any such decisions will involve meaningful human review and oversight in accordance with applicable data protection laws.
- 3.5 Where AI or other technology providers process personal data outside the United Kingdom or European Economic Area, we will implement appropriate safeguards in accordance with applicable data protection laws, including the use of adequacy regulations, international data transfer agreements, or standard contractual clauses where required.

4 HOW WE USE YOUR PERSONAL DATA

- 4.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 4.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Category of Individuals	Purpose/activity	What information is collected?	Lawful basis for processing
Website users	To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) To deliver relevant website content to you and measure or understand the effectiveness of advertising To monitor use of our website and to use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Website data as referred to above including your IP address	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy) Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Individuals who enquire about our services	To respond to requests made via our website, social media channels, or by email, telephone or post and provide information about our services	Name, email address and any information provided in your message to us	Necessary for our legitimate interests (to respond to enquiries from potential clients and other interested parties) Necessary to perform our contract with you (where you are communicating with us in connection with our services)
Individuals who receive our services and we market to them similar services or products or when we send marketing messages to businesses (and not individuals)	To send marketing materials to those individuals about our services or events that we feel may be of interest to you	Name, email address, job title and role	Necessary for our legitimate interests (to promote our services and events to interested parties who have not declined or opted out of receiving communications from us)
Business contacts	To evaluate potential service providers, and to enter into and perform contracts with our service providers	Name, contact details and job title	Necessary for our legitimate interests (where we have engaged a third-party service provider, we require to be in contact with representatives of that service provider in order to receive the full benefit of their services)
Job applicants	To recruit members of staff to fulfil vacant positions and to undertake equal opportunities monitoring	Name, email address, contact details, details you provide in our application forms and in your CV, the details of necessary background checks, information from referees and right to work documentation	Necessary for us to take required steps before potentially entering into an employment contract with you Necessary for our legitimate interests (to keep a record of applications in the event of a claim)
Other	As part of our delivery services	Publicly available information	Necessary for our legitimate interests (for running our business)

Notify you about changes	We may contact you where necessary in order to update you about any changes to the Bioscript Group or information relating to our services that affects you, including updates to our website terms and privacy notice	Name, email, job title	Necessary in our legitimate interests (to update you about our services and events) Necessary in order for us to comply with our legal duties
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4.3 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

4.4 Change of purpose

- (a) We will only use your personal data 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.
- (b) If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.
- (c) Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 DISCLOSURES OF YOUR PERSONAL DATA

5.1 We may share your personal data with the categories of third parties set out below:

- (a) Other companies within the Bioscript Group.
- (b) Third parties who we work with in order for us to deliver our services to you such as market research companies.
- (c) Service providers who provide IT, administration and HR services to us.
- (d) Professional advisers including funders or potential funders, lawyers, bankers, auditors, tax advisers and insurers who provide consultancy, banking, legal, insurance, tax and accounting services.
- (e) Regulators and other public authorities who regulate our activities in the jurisdictions in which we operate.
- (f) Fraud prevention agencies and crime prevention agencies.

- (g) Third parties to whom we sell, acquire, transfer or merge parts of our business or our assets.
- (h) providers of artificial intelligence, software-as-a-service (SaaS), cloud-hosted applications, analytics platforms, automation tools, and other technology services that support the operation of our business and delivery of our services.

5.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6 INTERNATIONAL TRANSFERS

- 6.1 The Bioscript Group entities are based in the United Kingdom; however, we offer our services in the European Economic Area (EEA; as well as in the UK).
- 6.2 We may transfer personal data to countries other than the country in which the data was originally collected (for example, outside the UK/EEA) in order to provide you with our services. These countries may not have the same data protection laws as the country in which you initially provided the information and may not provide the same level of protection.
- 6.3 If we transfer personal data to countries outside of the UK or EEA, we may rely on a decision from the European Commission or UK Information Commissioner's Office determining that the country provides an adequate level of protection to the Data Protection Laws. Alternatively, we may rely on appropriate safeguards in respect of transfers of personal data to a country outside of the UK, for example, by entering into international data transfer agreements or the UK/ European standard contractual clauses.
- 6.4 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and how this is protected.

7 DATA SECURITY

- 7.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 7.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 DATA RETENTION

8.1 How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Subject to the above, our general retention periods are as follows:

- a) Users of the website: up to 6 years.
- b) Job applicants: where your application is unsuccessful, we shall not store your personal data for longer than 24 months. If successful your data will be retained in accordance with our employee privacy policy.

9 YOUR LEGAL RIGHTS

9.1 Under certain circumstances, you have rights under Data Protection Laws in relation to your personal data:

- (a) **The right to access personal data we hold about you:** you can contact us to request a copy of the data we hold about you, as well as why we process that data, who has access to it and where we got it.
- (b) **The right to correct, restrict and update the personal data we hold about you:** if the data we hold about you is out of date, incomplete or incorrect, please let us know and we will ensure that it is updated.
- (c) **The right to have your personal data erased:** in some circumstances if you no longer wish us to process your data, you can request that we erase it. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.
- (d) **The right to object to processing of your personal data:** you have the right to request that we stop processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have lawful grounds to continue, for example if the data is required to allow us to provide you with services or to comply with legal or regulatory obligations. If data is no longer processed, we may continue to hold your data to comply with your other rights.
- (e) **The right to data portability:** you have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.
- (f) **Automated decision making, profiling and AI-assisted processing:** We may use AI and other automated technologies to assist with our business operations and service delivery. However, you have the right not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. Where AI tools are used to support decision-making, appropriate human oversight will be maintained.
- (g) **The right to complain:** you have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues (ico.org.uk). We would, however,

appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Marketing – opting out

- (a) You can ask us to stop sending you marketing messages at any time by contacting us at any time, or (where the communication is an email) you can click the "unsubscribe" link contained in the email.
- (b) Please note it may take up to 28 days in order for us to action your request within our systems.
- (c) Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of our services.

9.2 If you wish to exercise any of the rights set out above, please contact us at the details set out above.

9.3 What we may need from you

When you exercise your data subject right to access your data, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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