

Website Privacy Notice

1. INTRODUCTION

Welcome to Sygnature Discovery's Website Privacy Notice.

Sygnature Discovery respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Notice is provided in a layered format, so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Notice.

2. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of This Privacy Notice

This Privacy Notice aims to give you information on how Sygnature Discovery collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter.

In particular, we collect and use personal data for the following primary purposes:

- Operating and securing our website;
- Responding to enquiries and providing our services;
- Marketing and business development communications (where permitted by law);
- analysing website usage and improving our digital services; and
- recruitment and talent acquisition (where you apply for roles through the website).

This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them.

Controller(s)

Sygnature Discovery Limited and our subsidiaries are data controllers and are responsible for your personal data (collectively referred to herein as "Sygnature Discovery", "we", "us" or "our").

Depending on your location and the nature of your interaction with us, your personal data (or "personal information" for Quebec residents) is controlled by one or more of the following entities:

- **Sygnature Discovery Limited** a company incorporated in England and Wales, acts as data controller for individuals located in the United Kingdom and the European Economic Area; **NuChem Sciences Inc. (doing business as Sygnature Discovery™)** acts as the entity responsible for personal information for individuals located in Québec, Canada,
In some circumstances, these entities may act as **joint controllers** (or jointly responsible persons) where systems, services or business operations are shared.

We have appointed a data privacy manager (in the UK) and a personal information officer (in Quebec) who are responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please use the details set out below.

Contact Details

Title: *Data Privacy Manager*

Company: *Sygnature Discovery Limited*

Address: *The Discovery Building, BioCity, Pennyfoot Street, Nottingham, NG1 1GR, United Kingdom*

E-mail: BusDev@sygnaturediscovery.com

Telephone: +44 (0)115 9415 401

Title: *Personal Information Officer*

Company: *NuChem Sciences Inc. (doing business as Sygnature Discovery™)*

Address: 2350 Cohen Street, Saint-Laurent, Qc, H4R 2N6, Canada

E-mail: andre.giroux@sygnaturediscovery.com

Telephone: 514-416-5659 extension 1208

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or Commission d'accès à l'information (CAI) du Québec (CAI), the supervisory authority for data protection issues in Québec. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or the CAI so please contact us in the first instance.

Your Duty to Inform Us of Changes

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.

Third-Party Links

This 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.

3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes e-mail address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, 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.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does 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 which will be used in accordance with this Privacy Notice.

We do not collect any Special Categories of Personal Data about you (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). Nor do we collect any information about criminal convictions and offences.

Some of our website analytics and marketing tools may involve the use of personal data to analyse preferences, interests or behaviour in order to improve our website content and marketing effectiveness. This does not involve automated decision-making that produces legal or similarly significant effects on individuals.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and contact data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you request our services or request marketing to be sent to you.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.

5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Where permitted by applicable law, and subject to jurisdiction-specific requirements,, we do not generally rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via e-mail. You have the right to withdraw consent to marketing at any time by Contacting us or by following the consent withdrawal procedure referenced in the direct marketing communications we may have sent to you.

To whom do we disclose your personal information?

In certain circumstances, we rely on our parent company, our affiliated companies, or suppliers to help us serve you. Before disclosing your personal information to them, we take reasonable measures to ensure that they commit to respecting this policy. We may disclose your personal information to suppliers who assist us in the following categories:

Categories of Third Parties & Explanations

- Parent Company or Affiliated Companies

We sometimes share personal information with our parent company and our affiliated companies to centralize the management of certain operations.

- Technology Service Providers

We use technology providers to supply, host, and maintain our Website and our online services. For example, the service provider hosting the Website and performing Website maintenance services could potentially access users' personal information in the course of performing specific services under confidentiality obligations.

- Communication Service Providers

We use third-party service providers to assist us with the management of our product promotions and communications. For example, we use a third-party provider to send you email communications such as our newsletter.

- Analytical and Performance Service Providers

We engage third-party service providers to monitor and analyze the use of our Website. For instance, we use providers that offer audience analysis tools or performance reports on individuals who view advertisements or announcements, or who conduct online searches based on preferences, interests, demographic settings, or from geographical areas, enabling us to target similar audiences for advertising purposes.

- Social Platform

When you interact with our social media accounts, your data may be shared with social media providers. When you share our content through social media pseudonyms on our website, these social media platforms are also responsible for your personal information and may use it for other purposes, so please consult their privacy policies displayed on their respective domains.

- Professional Advisors

We may communicate your personal information to our legal, financial, accounting, or other consultants as necessary to operate our business activities and comply with applicable laws.

- Police and Governmental Agencies

We may receive requests from the police or other governmental authorities to access your personal information. We ensure the request is legitimate before responding.

In the event of a significant change in our business structure, we may disclose personal information about you to the other party to conclude the business transaction.

Purposes for Which We Will Use Your Personal Data

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.

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.

Purpose/Activity	Type of data	Lawful Basis for Processing
To provide you with services	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which may include notifying you about changes to our terms or Privacy Policy	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of admin and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to develop client base, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our services and grow our business)
To receive job application	(a) Identity (b) Contact (c) Curriculum Vitae (CV)	(a) Necessary for our legitimate interests

Marketing

We may use your Identity, Contact, Technical and Usage to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details during conferences and other events and, in each case, you have not opted out of receiving that marketing.

Opting Out

You can ask us to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase.

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.

Where required by law, we obtain your consent before placing non-essential cookies on your device. You can manage or withdraw your cookie preferences at any time using our cookie management tool or through your browser settings.

Recruitment

We operate a separate website for our recruitment activities, please use this link to access the site: <https://careers.sygnaturediscovery.com/>

The privacy policy for our recruitment website is available here <https://careers.sygnaturediscovery.com/data-privacy>.

Change of Purpose

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

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.

7. INTERNATIONAL TRANSFERS AND DATA HOSTING

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we transfer personal data outside the United Kingdom, the European Economic Area or Québec, we implement appropriate safeguards to ensure an adequate level of protection, including:
 - standard contractual clauses or international data transfer agreements approved under UK or EU data protection law; and
 - contractual and organisational measures designed to provide protection equivalent to that required under Québec privacy legislation.

We also carry out risk assessments where required by applicable law.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Depending on where you are accessing our website from, we may host your personal information in Quebec, Canada. However, our parent company, Sygnature Discovery Limited, is located in the United Kingdom, and our service providers may be located elsewhere in the world, and thus, may host your personal information in another jurisdiction to provide their respective services. Therefore, they are subject to the laws of the country or state where they are located and may be subject to disclosure to governments, courts, or law enforcement or regulatory agencies therein. However, before we disclose your personal information to a third party outside of Quebec, we take reasonable measures to ensure that the information will be as protected as if it were in Quebec.

Our practices concerning your personal information are at all times governed by this policy and the applicable laws on the protection of personal information.

8. DATA SECURITY

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.

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.

9. DATA RETENTION

How Long Will You Use My Personal Data For?

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Information contained within CVs of unsuccessful candidates will normally be deleted within fifteen (15) months of receipt of the respective job application.

By law we have to keep basic information about our clients (including Contact and Identity Data) for six (6) years after they cease being clients for tax purposes.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data;
- Right to withdraw consent.

Individuals located in Québec also have rights under applicable provincial privacy legislation, including the right to be informed of a confidentiality incident involving their personal information, the right to request information about how their personal information is used to make decisions, and the right to data portability, subject to applicable legal conditions.

For further information, please refer to the Glossary set out below. If you wish to exercise any of the rights set out above, please contact us.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need from You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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.

Time Limit to Respond

We try to respond to all legitimate requests within one (1) month. Occasionally it may take us longer than one (1) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY

Lawful Basis

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

- **Service providers** acting as processors who provide IT, system administration and marketing services. To access such third-party service providers' privacy statements, please use the links provided below:

DocuSign: [DocuSign Privacy Policy](#)

Google Analytics: [Google Privacy Policy](#)

HubSpot: [HubSpot Privacy Policy](#)

Microsoft: [Microsoft Privacy Statement](#)

- **Professional advisers** acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- **HM Revenue & Customs (or equivalent), regulators and other authorities** acting as processors or joint controllers based in the United Kingdom and Canada who require reporting of processing activities in certain circumstances.

Your Legal Rights

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.