

## PRIVACY AND COOKIE POLICY

This privacy and cookie policy sets out how **Oxford Gene Technology (Operations) Limited (OGT, we, our or us)** processes your personal data when you access and use the NGS Interpret™ cloud services (**Services**). We may process your personal data for other purposes outside the scope of these Services, as we explain in our general privacy policy (found [here](#)). Please read the following carefully to ensure you understand our views and practices regarding your personal data.

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### 1. IMPORTANT INFORMATION AND WHO WE ARE AND SAAS AGREEMENT

**Controller.** OGT is the controller and responsible for your personal data when you access and use the Services under a SaaS Agreement (as defined below).

**SaaS Agreement.** OGT will have entered into an agreement with the organisation that you represent (**Organisation**) for the use of the Services (**SaaS Agreement**). Please note that the information that the Organisation and/or you provide to us (whether it is personal data or not) will also be governed by the SaaS agreement. If you have any questions about the Organisation's processing activities, we recommend that you check the Organisation's privacy policy.

### 2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

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

- **Identity Data** includes first name, last name and email address .
- **Contact Data** includes information about the Organisation you represent and your email address and phone number.
- **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, device ID and other technology on the devices you use to access the Services.
- **Profile Data** includes your email address and password.

- **Usage Data** includes information about how you interact with and use the Services.

We (and our service providers) may also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we (and our service providers) may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **Your interactions with us.** You may give us your personal data by corresponding with us. This includes personal data you provide when validating the account you have with us to use the Services or contact us.
- **Your Organisation.** As part of the SaaS Agreement, the Organisation will provide us with your name and email address to allow us to set up your user account.
- **Automated technologies or interactions.** As you interact with the Services, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see for further details *below*.

### 4. HOW WE USE YOUR PERSONAL DATA

**Legal basis.** The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business, perform and administer the contract we enter into with your Organisation and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

**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 the various categories of 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.

Purpose/Use	Type of data	Legal basis
To register you as a user	(a) Identity (b) Contact (c) Profile	Legitimate Interest (to allow us to perform the obligations under the SaaS Agreement with your Organisation).
To enable you to access and use the Services	(a) Identity (b) Contact (c) Profile	Legitimate Interest (to allow us to perform the obligations under the SaaS Agreement with your Organisation).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms of use or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d)	Legitimate interests (to keep our records updated and manage our relationship with you and to allow us to perform the obligations under the SaaS Agreement).
To administer and protect our business and the Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Profile (c) Technical	(a) 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). (b) Necessary to comply with a legal obligation.
To use data analytics to improve the Services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep the Services updated and relevant, to develop our business and to inform our marketing strategy).

**Cookies.** The Services use cookies to distinguish you from other users and to enable you to access the Services. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of the Services. These essential cookies are always enabled because the Services will not work properly without them. They include, for example, cookies that enable you to log into the Services. You can switch off these cookies in your browser settings but you may then not be able to access the Services.
- **Functionality cookies.** These are used to recognise you when you return to the Services. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**You can find information about the individual cookies we use and the purpose for which we use them in the table below:**

<b>Cookie Title Cookie Name</b>	<b>Purpose</b>	<b>More information</b>
JSESSIONID	Session management	N/A

**Choices about cookies.** Strictly necessary cookies are always active. You can change your mind about the use of functionality cookies at any time by updating your browser settings. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Services.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We will share your personal data with group companies. We may also disclose your personal data to the following third parties for the purposes set out in the table above

- to service providers who support our operations (such as cloud service provider).
- to professional advisers such as including lawyers, bankers, auditors and insurers.
- to legal and regulatory authorities, any government agencies and law enforcement bodies.
- We may provide information to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets (or with whom we may discuss any such activities) or who choose (or contemplate) to invest in us. 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 policy.

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**

Whenever we transfer your personal data out of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

- We use specific standard contractual terms approved for use in the UK by the UK government and/or the EEA by the European Commission, in both cases which give the transferred personal data the same protection as it has in the UK and/or the EEA (as applicable).
- We will only transfer your personal data to countries that have been to provide an adequate level of protection for personal data by the UK government or European Commission, as applicable.

Please [contact us](#) if you want further information on the measures used for this purpose.

## **7. 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.

## **8. DATA RETENTION**

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.

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, regulatory, tax, accounting or other requirements. If you would like further details, please let us know.

In some circumstances we will 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.

## **9. YOUR LEGAL RIGHTS**

You have a number of rights under data protection laws in relation to your personal data. Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as making 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 rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **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 exercised your right to object to processing (see below).
- **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.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal data to another party.

If you wish to exercise any of the rights set out above, please [contact us](#). If any legal limitations to your rights apply, we will explain these to you.

**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 could 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 month. Occasionally it could take us longer than a 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.

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, for example a new address or email address.

## 10. COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.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.

## 11. CONTACT DETAILS

If you have any questions about this privacy and cookie policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Contact us form: <https://www.ogt.com/contact/contact-general/>
- Postal address: Unit 5, Oxford Technology Park, 4A Technology Dr, Kidlington OX5 1GN, UK

## 12. THIRD-PARTY LINKS

The Services 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 the Services, we encourage you to read the privacy policy of every website you visit.

## 13. CHANGES TO THIS PRIVACY AND COOKIE POLICY

We keep our privacy and cookie policy under regular review. This version was last updated on 12 August 2025.