



Privacy Policy

Introduction

LifeArc respects your privacy and is committed to protecting your personal data. This privacy policy sets out how we use and protect your personal data that you or others provide to us, including data from your use of our website and tells you about your privacy rights and how the law protects you.

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You can download a PDF version of our policy [here](#).



1. Important Information and Who We Are

Purpose of This Privacy Policy

This privacy policy aims to give you information on how LifeArc collects and processes your personal data through your use of this website, including any data you may provide through this website when you fill out a 'Contact Us' or 'Get In Touch' form; use the website to message any of our staff; apply for an award, grant or other funding; make an application for employment with us; contact us about services we are providing to you; or provide feedback about this 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 policy, together with any other privacy policy 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 policy supplements any other such notices and is not intended to override them.

Controller

The "LifeArc Group" is made up of LifeArc and LifeArc Innovations Limited. This privacy policy is issued on behalf of the LifeArc Group so when we mention "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the LifeArc Group responsible for processing your data. We will let you know which entity will be the controller for your data when you interact with us. LifeArc is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact Details

Full name of legal entity: LifeArc

Title of data privacy manager: General Counsel & Company Secretary

Email address: dataprivacy@lifearc.org

Postal address: LifeArc, Lynton House, 7-12 Tavistock Square, London, WC1H 9LT

ICO registration number: Z6907935

Telephone number: +44 (0) 20 7391 2700

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

Version of our Privacy Policy

This version of our Privacy Policy was updated on 12th September 2018.



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 policy of every website you visit.

2. The Data We Collect About You

Personal data, or personal information, means any information about a living 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, title, date of birth and gender
- **Contact Data** includes email address, employer/academic institution and position, invoice address and telephone number
- **Financial Data** includes bank account details
- **Transaction Data** includes details about payments to and from you
- **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
- **Profile Data** includes your website feedback
- **Usage Data** includes information about how you use our website and interact with LifeArc
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We may 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 by 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 policy.

We do not collect any **Special Categories of Personal Data** about you (see the Glossary for a definition of this kind of data).

Criminal Convictions Data

If you apply for employment with us, we may collect information about criminal convictions, in the form of a DBS certificate, as part of the pre-employment screening process, but only where we have obtained your consent to do so. We will only collect this if it is appropriate, such as for a role that requires a high degree of trust and integrity. If collected, we will use this information as a condition of an offer of employment. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

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 provide you with services). In this case, we may not be able to perform the contract you have with us or otherwise fulfil your request, but we will notify you if this is the case at the time.

3. How Your Personal Data Is Collected

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms, at in-person events, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you do any of the following:
 - Apply for grants or awards
 - Negotiate and/or enter into a contractual arrangement with us
 - Request information be sent to you
 - Give us your business card
 - Request that we contact you
 - Apply to work for us
 - Give us feedback.
- **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, server logs and other similar technologies. Please see our cookie policy [here](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity and Contact Data from publicly available sources such as Companies House (based inside the EEA)
 - Contact, Financial and Transaction Data from providers of technical and payment services such as banks (based inside or outside the EEA).

4. 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.

Generally, we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending marketing communications to non-corporate subscribers via email. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which We Will Use Your Personal Data

We have set out in drop-down tabs below, a description of the ways we plan to use your personal data, depending on the type of data subject you are, 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 below.

Data Subject	Purpose/Processing Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
Applicants for Awards, Grants or Funding	To contact you about your application for awards, grants or funding, such as from our Philanthropic Fund or LifeArc Awards, or to answer any questions you may have about such awards, grants or funding. Your personal data may be disclosed to and processed by external peer reviewers, professional advisors and other research bodies, some of whom may be based outside the EEA.	(a) Identity (b) Contact	Necessary for our legitimate interests (as it would be beneficial to us to provide such awards, grants or funding)
Applicants for	To contact you about your application for employment	(a) Identity (b) Contact	Necessary for our legitimate interests (as it

Employment	or to answer any questions about roles with us		would be beneficial to us to appoint someone to that role)
LifeArc Technology Transfer and Charity Clients	<ul style="list-style-type: none"> (a) To deliver services that you have contracted to receive from us (b) To manage payments, fees and charges, if any (c) To collect and recover money owed to us, if any 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
Marketing Email Subscribers	To contact you with LifeArc news, events, and calls for funding applications, potential scientific collaborations, services and research updates that may be of interest to you	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications (d) Technical (e) Usage (f) Profile 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to develop our services and grow our business) (b) Consent to receive marketing emails
Event Attendees	To administer the event.	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to develop our services and grow our business)
Website Visitors	<ul style="list-style-type: none"> (a) To notify you about changes to our terms or privacy policy (b) To ask you to provide feedback or input 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Marketing and Communications 	<ul style="list-style-type: none"> (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 and to understand how you use our services and website)
	To administer and protect our business and this website (including troubleshooting, data analysis, testing, system	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of

	maintenance, support, reporting and hosting of data)		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 deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our services and to develop them, to grow our business and to inform our marketing strategy)
	To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Marketing

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

You will receive marketing communications from us if you have requested information or services from us, or if you provided us with your details through the website and, in each case, you have not indicated a change to your marketing preferences. You will not receive marketing communications from us as a non-corporate subscriber unless you have ‘opted-in’ to receive such communications.

Third-Party Marketing

We will not share your personal data with any company outside the LifeArc Group for marketing purposes, unless you specifically request that we do so.

Opting Out of Marketing

You can ask us to stop sending you marketing messages by [contacting us](#) at any time. If you opt out of



receiving these marketing messages, this will not apply to personal data provided to us as a result of a contract you have with us, a service that we provide to you, or other transactions.

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. For more information about the cookies we use, please see our Cookie Policy [here](#).

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 would like 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.

5. Disclosures of Your Personal Data

We may have to share your personal data with the **External Third Parties** set out in the Glossary, for the purposes set out in the table in Section 4 above.

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

Some of our External Third Parties are based outside the European Economic Area (EEA) so their processing of your personal data will 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:

- the transfer of your personal data is to a third party in a country that has been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- a specific contract, approved by the European Commission, is in place with a third party, to give personal data the same protection it has in the EEA. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- where a third party is based in the US, we may transfer data to them if they are part of the EU/U.S.



Privacy Shield, which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [contact us](#) if you want further information on the specific mechanism we use when transferring your personal data out of the EEA.

Applicants for Funding and Marketing Email Subscribers

We store your data on a databased called Salesforce. Salesforce is based in the United States and has certified its compliance with the EU-U.S. Privacy Shield.

7. Data Security

We have put in place appropriate technical and organisational 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 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.

In some circumstances you can ask us to delete your data: see Section 9 - Your Legal Rights below for further information.

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.

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)

- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Object to processing of your personal data](#)

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 month. Occasionally it may 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.

10. Glossary

Data Subject

A data subject is a living individual, who is identified or identifiable, about whom we hold personal data.

External Third Parties

- Service providers, acting as processors, based both inside and outside the EEA who provide IT, human resources, finance, system administration and other services.
- Professional advisors, acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based both inside and outside the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, the Information Commissioner's Office and other regulators and authorities, acting as processors or joint controllers, based in the United Kingdom, who require reporting of processing activities in certain circumstances.

GDPR

The EU General Data Protection Regulation ((EU) 2016/679).

Legitimate Interest

The interest of our business in conducting and managing our business to enable us to give you 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](#).

Processing

Processing of personal data is defined very widely. It is any activity that involves the use of personal data, including obtaining, recording or holding the data, or carrying out any operations on the data, such as organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties.

Special Category Personal Data

Under the GDPR, special category data is information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.