

## Data Privacy Notice

### Our contact details

Name: Critigen

Address:

1430 Summit Ave

Suite 100C

Seattle, WA 98122

Phone Number: +1 303-713-3230

E-mail: [dpo@critigen.com](mailto:dpo@critigen.com)

### Objective

The aim of the Critigen Data Privacy practices is to provide adequate and consistent safeguards for the handling of Business Data by Critigen U.K. Limited (Information Commissioner's Office Registration Number: Z3335338) in accordance with the regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), which is directly applicable since 25 May 2018 in all EU Member States and any implementing national legislation.

Critigen complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Critigen has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall prevail and apply on the US territory only. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

### The type of information we have

Through normal business processes Critigen collects Personal Data. Critigen defines personal data as any information relating to an identified or identifiable natural person. While the normal business processes of Critigen do not directly collect Personal Data, Critigen recognizes that from time to time Personal Data may be collected.

This data may include but is not limited to:

- Email address
- Name
- Phone Number

## How we get the information and why we have it

Most of the personal information we process is provided to us by a vendor or other third-party. For any personal information that is stored for processing purposes please see the following for collection methods:

- Electronic collection (*i.e. forms, website, surveys etc*) only have the fields that are relevant to the purpose of collection and subsequent processing. We do not include 'optional' fields, as optional denotes that it is not necessary to obtain
- Physical collection (*i.e. face-to-face, telephone etc*) is supported using scripts and internal forms where the required data collection is ascertained using predefined fields. Again, only that which is relevant and necessary is collected
- We have SLA's and bespoke agreements in place with third-party controllers who send us personal information. These state that only relevant and necessary data is to be provided as it relates to the processing activity we are carrying out

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting [dpo@critigen.com](mailto:dpo@critigen.com)
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.

## What we do with the information we have

We use the information that you have given us in order to adjust our marketing efforts to better reach out customer base.

If you agree, Critigen shares this information with sales and marketing partners.

You have the right at any time to stop Critigen from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, you should notify the Critigen Data Privacy Officer at [dpo@critigen.com](mailto:dpo@critigen.com) or via mail at 1430 Summit Ave, Suite 100C, Seattle, WA 98122.

## How we store your information

Your information is securely stored in the Critigen data center.

We keep names, phone numbers, and email addresses for as long as the data maintains relevance, with a maximum retention period of 7 years. We will then dispose your information by wiping any personal data from the drive. Physical drives are shredded when disposed of.

For additional details for data storage and disposal, please review the Critigen Data Retention and Erasure Policy.

## Principles for processing data

Critigen respects data privacy and is committed to protecting Business Data in compliance with all applicable laws and regulations. Critigen is committed to limiting the use and disclosure of personal data and will observe the following principles:

- Data will be processed fairly and in accordance with applicable law.
- Data will be collected for specified, legitimate purposes and not processed further in ways incompatible with those purposes.
- Data will be relevant to and not excessive for the purposes for which they are collected and used. For example, data may be rendered anonymous if deemed reasonable, feasible and appropriate, depending on the nature of the data and the risks associated with the intended uses.
- Data will be accurate and, where necessary kept up up-to-date. Reasonable steps will be taken to rectify or delete Personal Data that is inaccurate or incomplete.
- Data will be kept only as it is necessary for the purposes for which it was collected and processed.
- Data will be processed in accordance with the individual's legal rights (as described in these Standards or as provided by law).
- Appropriate technical, physical and organizational measures will be taken to prevent unauthorized access, unlawful processing and unauthorized or accidental loss, destruction or damage to data. In case of any such violation with respect to Personal Data, Critigen will take all necessary steps to end the violation and determine liabilities in accordance with applicable law.

- Critigen shall ensure that the same principles and rights are observed by any third entity with which Critigen has entered a transaction, if that entity collects and/or processes personal data.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to access your personal data and may do so by sending a request for copies of your personal information to [dpo@critigen.com](mailto:dpo@critigen.com).

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

**Cookies** - Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

Critigen uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in;
- Understanding how you use our website.

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

## Privacy policies of other websites

Our website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [dpo@critigen.com](mailto:dpo@critigen.com) if you wish to make a request.

## Enforcement rights and mechanisms

In compliance with the Privacy Shield Principles, Critigen commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact the Critigen Data Protection Officer.

The DPO can be reached at [dpo@critigen.com](mailto:dpo@critigen.com) or via mail at

1430 Summit Ave  
Suite 100C  
Seattle, WA 98122

If your concerns cannot be resolved by working with the Data Protection Officer your concerns will be reviewed by a member of the Critigen executive leadership team for resolution. Critigen commits to reviewing and responding to a complaint within 45 days of receipt of the complaint.

Critigen has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning personal data transferred from the UK business entity to the US business entity.

Furthermore, Critigen is subject to:

- the investigatory and enforcement powers of the Federal Trade Commission (FTC)
- the possibility, under certain conditions, for the individual to invoke binding arbitration
- the requirement to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements
- liability in cases of onward transfers to third parties

To learn more about **Privacy Shield**, understand your rights, or to file a complaint, please visit <https://www.privacyshield.gov/>

You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113

## Obligations related to data protection authorities

Critigen will respond diligently and appropriately to requests from data protection authorities about data protection practices and/or compliance with applicable data protection privacy laws and regulations. Critigen will, upon request, provide data protection authorities with names and contact details of relevant persons. With regard to transfers of Personal Data between Critigen entities, the importing and exporting Critigen entities will (i) cooperate with inquiries from the data protection authority responsible for the entity exporting the data and (ii) respect its decisions, consistent with applicable law and due process rights. With regard to transfers of data to third entities, Critigen will comply and will cooperate with all competent data protection authorities in accordance with applicable legislation.