

Data Privacy Policy

Introduction

Omega Diagnostics Ltd (registered in Scotland with company number SC107178) is part of the Omega Diagnostics Group PLC registered in England and Wales with company number 5017761. Omega Diagnostics Ltd is focused on selling a wide range of specialist products, primarily in the immunoassay, in-vitro diagnostics (IVD) market within three segments:

- Allergy
- Food Intolerance
- Infectious Diseases

Our Mission is to improve human health and well-being through innovative diagnostic tests and global partnerships.

The company has two main offices one in Scotland and one in England:

Omega Diagnostics Ltd., Omega House, Hillfoots Business Village, Alva FK12 5DQ Scotland

T: 01259 763030

@gdpr@omegadiagnostics.co.uk

Omega Diagnostics Ltd., Eden Research Park, Henry Crabb Road, Littleport CB6 1SE England

T: 01353 863279

@gdpr@omegadiagnostics.co.uk

Cambridge Nutritional Sciences and Genesis Diagnostics are brands of Omega Diagnostics Ltd.

Omega Diagnostics Ltd runs a service lab processing health and well-being tests under the Cambridge Nutritional Sciences brand and manufactures diagnostic test kits under the Genesis Diagnostics brand. Both are based at the Omega Diagnostic Ltd site in England.

In this policy "personal data", or "personal information", both refer to any information relating to an identified, or identifiable individual.

This policy demonstrates our commitment to protecting the privacy and security of your personal

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information.

LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We will only process personal information in accordance with the lawful basis for processing. At least one of the following will apply when we process personal data:

- Consent: You have given clear consent for us to process your personal data for a specific purpose.
- Contract: The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract.
- Legitimate interest: The processing is necessary for us to comply with our legitimate interests.

COLLECTION OF PERSONAL INFORMATION

We collect personal data from you for the following purposes:

- To process samples for our lab services
- To register you as a professional practitioner so we are able to offer our lab services
- Payment card details to process payments for our products and services
- To fulfill a contract for the distribution of our products abroad
- To keep you updated on our products and services

METHOD OF COLLECTION OF PERSONAL INFORMATION

We collect your personal information through a number of different sources.

- Via our website
- On our Laboratory Information Management System (LIMS)
- Via request forms included in sample collection packs with each test using the service laboratory
- Through transactions made by phone or via our website
- Via laboratory samples

PAYMENTS

Payment card details received over the phone, by post or at seminars and exhibitions are either processed at point of receipt or at our site in Littleport. All payment card details are destroyed after payment has been made.

We also adhere to the Payment Card Industry Data Security Standards (PCI-DSS).

MARKETING

We will send you marketing emails and newsletters to keep you updated on our products and services when you have opted in to receiving them. You can at any time opt out of receiving these emails. For surveys we use Survey Monkey who are Privacy Shield Framework registered.

RIGHT TO WITHDRAW CONSENT

Where you have provided consent for us to process data, you also have the unrestricted right to withdraw

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Doc Ref: 002-35 Issue Number: 01 Issue Date: 10 Oct 18 Page 2 of 8



that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some circumstances we will need to retain this data until we are no longer legally required to do so.

For further information or queries please contact the Data Protection Officer (DPO).

USE OF COOKIES ON THE SITE

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why. We've listed the cookies we use here so you that you can choose if you want to opt-out of cookies or not.

www.camnutri.com:

Cookie Name	Purpose	Expiry		
Column 1 Column 2 Column 3				
Necessary:				
cfduid	Used by the content network, Cloudflare, to identify trusted web traffic	1 year		
Statistics:				
@@History/@@scroll #	Unclassified	Persistent		
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	2 years		
_gat	Used by Google Analytics to throttle request rate	Session		
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Session		
Collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	Session		
p.gif	Unclassified	Session		

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Marketing:		
NID	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads	6 months
Unclassified:		1
_landing_page	Tracks landing pages	13 days
_orig_referrer	Tracks landing pages	13 days
_S	Shopify analytics	Session
_shopify_fs	Shopfiy analytics	2 years
_shopify_s	Shopfiy analytics	Session
_shopify_sa_p	Shopify analytics relating to marketing & referrals	Session
_shopify_sa_t	Shopify analytics relating to marketing & referrals	Session
_shopify_y	Shopify analytics	2 years
_y	Shopify analytics	2 years
cart_sig	Unclassified	13 days
Cookies.js	Unclassified	Session
Cookietest	Unclassified	Session
Secure_customer_sig	Unclassified	20 years
Storefront/page	Unclassified	Session
Storefront/session- attribution	Unclassified	Session
Storefront/track	Unclassified	Session

www.omegadiagnostics.com:

Cookie Name	Purpose	Expiry
.ASPXANONYMOUS	Used to deliver anonymous user details when authorising applications on the website	69 days
_RequestVerificationToken	Helps prevent Cross-Site Request Forgery (CSRF) attack	Session
Language	Saves the user's preferred language on the website	Session
utm.gif	Google Analytics Tracking Code that logs details about	Session

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	the visitor's browser and	
	computer	
utma	Collects data on the number	2 years
	of times a user has visited	
	the website as well as dates	
	for the first and most recent	
	visit. Used by Google	
	Analytics.	
utmb	Registers a timestamp with	Session
	the exact time of when the	
	user accessed the website.	
	Used by Google Analytics to	
	calculate the duration of a	
	website visit.	
utmc	Registers a timestamp with	Session
	the exact time of when the	
	user leaves the website.	
	Used by Google Analytics to	
	calculate the duration of a	
	website visit.	
utmt	Used to throttle the speed of	Session
	requests to the server	
utmz	Collects data on w here the	6 months
	user came from, what	
	search engine was used,	
	what link was clicked and	
	what search term was used.	
	Used by Google Analytics.	
Dnn_IsMobile	This cookie is issued by	Session
	DNN and is necessary for	
	site functionality.	
euCookieLaw	Unclassified	10 years

We log visitors' domain and IP address automatically; this information does not identify you as an individual, but only the computer that is being used to view the site. This data is used to see where the site is being used in the world to ensure coverage, and for click stream analysis to help better understand site usage, so that we can improve our service to you. We do not link information automatically logged by such means with personal data about specific individuals

Information on deleting or controlling cookies is also available at www.allaboutcookies.org. Please note that by deleting our cookies (or disabling future cookies) you may not be able to access certain areas or features of the site.

Find out how to manage cookies on popular browsers:

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- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit http://tools.google.com/dlpage/gaoptout.

DATA RETENTION

We will retain your data for as long as we need it but for no longer than is necessary for the purpose for which it was collected.

At the end of the retention period or upon conclusion of any contract we may have with you, or until we are no longer legally required to retain it, your personal information will be reviewed and deleted, unless there is some special reason for keeping it.

We may continue to use data without further notice to you. This will only be the case where any such data is anonymised and you cannot be identified as being associated with that data.

SAMPLE RETENTION

Serum and Plasma samples are stored frozen and retained for a period of 1 month in our laboratory in Littleport, in accordance with the Royal College of Pathologists Guidelines. Additional testing or retests will only be performed upon specific request by the client. Samples will be disposed of after this period by incineration.

DATA SECURITY

As part of our commitment to protecting the security of any data we process, we employ security measures to avoid data from being accessed, damaged, interfered with, lost, stolen or compromised. In cases of a breach, or suspected breach, of data security you will be informed, as will any appropriate regulator, in accordance with our legal obligations.

Any data that is shared with third parties is restricted to those who have a business need, in accordance with our guidance and in accordance with the duty of confidentiality.

THIRD PARTIES

Some of our tests are processed by third party companies with whom we will share your personal data. All companies are GDPR compliant and data is treated with the strictest confidence

If we may receive details from third parties and will only contact people in relation to this information if there is a legitimate interest. For example if an agency contacts us and has a potential employee.

For further information please contact our DPO, GDPR@omegadiagnostics.co.uk.

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Doc Ref: 002-35 Issue Number: 01 Issue Date: 10 Oct 18 Page 6 of 8



Websites

We have two websites:

www.camnutri.com is hosted on Shopify Inc. who are based in Canada.

They provide us with the online e-commerce platform that allows us to sell our products and services to you. Your data is stored through Shopify's data storage, databases and the general Shopify application. They store your data on a secure server in Canada behind a firewall.

www.omegadiagnostics.com is hosted in the United Kingdom.

Payment:

Your credit card data is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted. All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover

PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

We commit to ensure that any data we process is correct and up to date. It is your obligation to make us aware of any changes to your personal information.

In some situations, you may have the;

- **Right to be informed.** This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- **Right to request access.** You have the right to access the data that we hold on you. To do so, you should make a subject access request.
- **Right to request correction.** If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it.
- Right to request erasure. If you would like us to stop processing your data, you have the right
 to ask us to delete it from our systems where you believe there is no reason for us to continue
 processing it.
- Right to object to the inclusion of any information. In situations where we are relying on a
 legitimate interest (or those of a third party) you have the right to object to the way we use your
 data where we are using it.
- Right to request the restriction of processing. You have the right to ask us to stop the
 processing of data of your personal information. We will stop processing the data (whilst still

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Doc Ref: 002-35 | Issue Number: 01 | Issue Date: 10 Oct 18 | Page 7 of 8



holding it) until we have ensured that the data is correct.

- Right to portability. You may transfer the data that we hold on you for your own purposes.
- **Right to request the transfer.** You have the right to request the transfer of your personal information to another party.

DATA PROTECTION OFFICER DETAILS

Please email <u>GDPR@omegadiagnostics.co.uk</u> with your enquiry.

PRIVACY POLICY UPDATES

This document will be regularly reviewed and updated as necessary

QUESTIONS OR COMPLAINTS

Should you have any questions regarding this statement, please contact the DPO.

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

Doc Ref: 002-35 Issue Number: 01 Issue Date: 10 Oct 18 Page 8 of 8