

Privacy Policy

Salient Labs Limited (trading as Salient Bio) (“our”, “us” or “we”) provides testing for human infections and diseases with next-day results for businesses and individuals, including both PCR and lateral flow antigen testing for COVID-19 (the “Services”).

This policy (together with our Master Terms of Service, service-specific Service Terms, and any other documents referred to therein (the “Agreement”)), sets out the basis on which we process personal data (also referred to as “personal information” or “information”).

This policy is addressed to:

1. individuals on whose behalf a third party is arranging testing (e.g. individual employees, where our client is the employer arranging for their employees to be tested);
2. individual customers who wish to use our testing services on their own behalf; and
3. a third party arranging for testing of individuals (e.g. an employer arranging for their employees to be tested),

(“you” or “your”).

Different sections of this policy apply depending on your circumstances.

1. If a third party is arranging for testing on your behalf

If a third party (e.g. your employer, travel agency, insurance provider, etc.) (the “Testing Organiser”) has arranged for you to get tested with us, we act as the data processor on behalf of your Testing Organiser, who acts as the data controller.

(However in certain limited circumstances, even where your Testing Organiser has arranged for you to get tested with us, we will act as the data controller and not as data processor in respect of information provided to us by you. These circumstances are in relation to:

- our on-boarding and account set-up processes for new users;
- our provision of support services to users; and
- analytics activities undertaken by us in relation to your use of the Services).

We will handle all information we receive in relation to your test in accordance with: (i) your Testing Organiser's instructions; (ii) our Agreement with your Testing Organiser; and (iii) our legal obligations. We do not use this information in relation to any other purposes. This information is generally comprised of your name, date of birth, gender, post code, phone number, email address, ethnicity, information linked to the biological sample for testing, and your test result.

Please note that our Agreement with your Testing Organiser includes an obligation for us to provide your test results to them. In addition, we contractually guarantee to your Testing Organiser that we shall:

- keep personal data secure and protect its confidentiality, integrity and availability;
- treat personal data as confidential information;
- seek their approval before we subcontract personal data processing to any third parties; and
- assist them in fulfilling their own data protection obligations concerning data subject rights, security of processing, data breach notifications, data protection impact assessments, regulatory consultations and data protection audits.

At the end of our Agreement with your Testing Organiser we undertake to return or destroy all information about you that we hold on their behalf and is capable of identifying you. The information about you that your Testing Organiser receives from us during or after our engagement will be handled in accordance with their own privacy policy. You are entitled to see a copy of that policy, so please do ask for it.

Please note that our legal obligations include an obligation to notify certain UK health authorities (for example Public Health England, the Department of Health and Social Care, and/or the UK Health Security Agency) of every test result we find of certain 'notifiable diseases' (for example, COVID-19). Such notifications will also include the following information about the affected individual: name, date of birth, gender, postcode, contact telephone number, email, ethnicity, date of the test result and other information as required by law. Your information will be handled by these authorities in accordance with their own notifiable diseases procedures and their own privacy policies. We may be required by law to retain this information also.

If you have any questions regarding our data handling practices, please use the contact information at the end of this policy. If you wish to see our standard data processing agreement, please contact dpo@salient.bio.

2. If you are an individual customer wishing to get tested on your own behalf

If you are an individual customer obtaining testing services directly from us, we will always act as the data controller in respect of your data. We may collect and use the following personal data about you: name, date of birth, gender, post code, phone number, email address, ethnicity, information linked to the biological sample for testing, and your test result. We collect most of this personal data directly from you – in person, by telephone, text or email, or via our website, web portal and/or mobile app. We collect and use this personal data for our legitimate interests that are to provide the Services to you. If you do not provide the personal data we ask for, it may delay or prevent us from providing the Services to you.

Please note that our legal obligations include an obligation to notify certain UK health authorities (for example Public Health England, the Department of Health and Social Care, and/or the UK Health Security Agency) of every test result we find of certain 'notifiable diseases' (for example, COVID-19). Such notifications will also include the following information about the affected individual: name, date of birth, gender, postcode, contact telephone number, email, ethnicity, date of the test result and other information as required by law. Your information will be handled by these authorities in accordance with their own notifiable diseases procedures and their own privacy policies. We may be required by law to retain this information also.

3. If you are using our web- and app-based Services

We variously operate a web portal and/or a mobile app which enables us to provide the Services in a structured, efficient and accessible manner. All of the above considerations apply when you use our Services which are based on or provided via our web portal and/or mobile app.

Subject to your consent or on the basis of our legitimate interests, we may also process certain additional technical information generated in the course of providing Services via our web portal and/or mobile app. We do this to ensure the Services are safe and reliable and in order to improve the Services. We act as the data controller in respect of this technical information you generate whilst using our Services via the web portal and/or mobile app. Such information is not sold or used for advertising or direct marketing purposes. This information may include: username; profile preferences; purchase order history; feedback provided; information about how you use our website, web portal and/or mobile app; internet protocol (IP) address; browser type and version; browser plug-in types and versions; time zone setting and location; operating system and platform; device data, such as the type of (mobile) device being used; a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device); mobile network information; your mobile operating system; and other technology on the devices you use to access the web portal and/or mobile app.

This information is generated with the help of 'cookies' and other similar technologies. Please see the below table for additional information on the cookies we use.

Name of technology	Type of technology	Party serving the technology	Purpose of technology	Retention period	Additional information
Google Analytics	Cookie	Google Inc.	Functionality, analytics, advertising	Lifespan of technology on users' hardware session	https://policies.google.com/privacy

4. Provisions that apply to all users of our Services

In order to deliver, manage, improve and promote our Services, we need to process certain information. These categories of information, and the basis on which we process them, are set out below.

Information we need to deliver and manage our Services

We need some basic information in order to set up our clients' accounts and to allow our clients to use our Services. We will also ask for some contact information so that we can reach out to our clients if that is necessary in relation to our Services. This information includes personal data about our clients' representatives' usernames and passwords, name, (corporate) email address and phone number. We process such personal data as is necessary for our legitimate interests that are to deliver our Services to our clients.

Information we need to improve our Services

We need some information from our clients in order to improve our Services. To that end we may ask clients to give us feedback about our Services. Such feedback may contain any information that the client representative has decided to include. As such, the contents of such information, which may include personal data, are entirely determined by you. We process such personal data as is necessary for our legitimate interests that are to improve our Services.

Subject to receiving your prior consent (which you will have the opportunity to provide or deny during our user on-boarding process) we may retain and use biological samples (and associated personal data) from end-users of the Services for the purposes of internal assay validation, developing new products, services and systems, and/or improving our existing products, services and systems.

Information we need to promote and advertise our Services

We may approach prospective clients on social media, over email or over the phone to inquire whether they are interested in receiving our Services. We will use whatever public information we find to do that. We may do this if we believe our Services or any promotional materials about our Services may be of interest to our prospective clients.

We will contact you if you fill in one of the web forms on our website. When we do that, we will use the contact details you have decided to provide in the relevant form.

The information we need to promote and advertise our Services may include personal data. We process such data as is necessary for our legitimate interests that are to grow our business.

Disclosure of your information

We treat personal data as confidential information and so do our vendors. We use various technological solutions providers in order to deliver our Services. They are prohibited from using your information for any purpose other than the delivery of their services to us. Nevertheless, depending on the type of vendor, they

may have access to your information. These providers include, for example, our: cloud storage providers; customer relationship management systems providers; email services providers; social media companies; analytics providers; and others who assist us in promoting, delivering and improving our Services, our web portal and/or mobile app.

In addition, we may also disclose your personal information to third parties in the following circumstances:

Purpose of the disclosure	Justification
If we sell or buy any business or assets, we may disclose personal data to the prospective seller or buyer of such business or assets.	Legitimate interests (to allow the prospective investors to properly evaluate our business).
If Salient Bio or substantially all of its assets are acquired by a third party, personal data will be one of the transferred assets.	Legitimate interests (to allow the prospective buyers to provide you with the Services).
If we are under a duty to disclose or share personal data in order to comply with any legal obligation or to protect the rights, property, or safety of Salient Bio, our clients, or others.	Legal obligation.
We may disclose personal data to third parties, the court service, regulators and/or law enforcement agencies in connection with proceedings or investigations anywhere in the world where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.	Legal obligation or legitimate interests (to safeguard our business).

Security over the internet

No data transmission over the internet or website can be guaranteed to be completely secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect personal data in accordance with the requirements of applicable data protection legislation.

We use hosted servers to deliver our Services. Our suppliers employ industry-leading standards in information security and contractually guarantee to keep personal data secure.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Services, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share your password with anyone.

Exports outside the EEA

We store personal data electronically on computer systems located in the United Kingdom and managed by our staff and our vendors. In certain circumstances personal data may be accessed by staff, stored with or transferred by our vendors in, a destination outside the United Kingdom (UK) or the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the UK or the EEA. In such circumstances we will impose data protection safeguards similar to those that we deploy inside the UK and the EEA. Where required by applicable law, we will transfer personal data subject to European Commission approved contractual clauses that impose equivalent data protection obligations directly on the recipient.

Please contact us if you would like further details of the specific safeguards applied to the export of your personal data.

How long we retain your personal data

We will hold personal data for as long as is necessary in order to conduct the processing detailed above, deal with any specific issues that may raise, or otherwise as is required by law or any relevant regulatory body. We delete personal data relating to client accounts within 12 months of an account being terminated or deactivated. Some personal data may need to be retained for longer than this (for up to six years) to ensure we can comply with applicable laws and internal compliance procedures.

We restrict access to personal data to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and personal data that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the personal risk or harm from unauthorised use or disclosure, the purpose for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your rights

Under the General Data Protection Regulation (EU) 2016/679, you have various rights in relation to your personal data. All of these rights can be exercised by contacting us at dpo@salient.bio.

You have the right:

- to be informed;
- to access (such information);
- to rectification (of inaccurate information);
- to erasure;
- to restrict processing (in certain cases);
- to object to profiling;
- to data portability (in certain cases);
- to complain to the Information Commissioner's Office; and
- to withdraw consent (if we have collected your personal information on this basis).

Detailed information on the full content of your rights (and any conditions that may apply) is provided by the United Kingdom's Information Commissioner's Office and is available on their website: <https://ico.org.uk/your-data-matters/>.

Asking us to stop processing your personal data or deleting your personal data will likely mean that you are no longer able to use our Services, or at least those aspects of the Services which require the processing of the types of personal data you have asked us to delete.

While we will not sell your personal data (or any other data you provide us with) to third parties, we reserve the right to share any data which has been anonymised. You acknowledge and accept that we own all right, title and interest in and to any derived data or aggregated and/or anonymised data collected or created by us.

Changes to this policy

Any changes we make to our privacy policy in the future will be posted on this page. We therefore encourage you to review it from time to time to stay informed of how we are processing your information.

Contact

Questions, comments and requests regarding this privacy policy are welcome and should be addressed to contact@salient.bio

For the purpose of the relevant data protection legislation, the data controller is **Salient Labs Limited** (company no. 12662440), with registered address at The Biscuit Factory, Drummond Road, London, England, SE16 4DG.

Date of last amendment: 05 November 2021