



## Website Privacy Notice

### Introduction

Welcome to the Sterling Pharma Solutions (“Sterling/we/our”) Privacy Notice (“Notice”). Sterling respects your privacy and is committed to protecting your personal data.

This Notice explains how Sterling may collect and use personal data that it obtains about you when you interact with us, including when you visit our website, and your rights in relation to that data.

This Notice may be amended from time to time. Please visit this page if you want to stay up to date, as we will post any changes in our approach to data privacy here. It is also important that the information Sterling holds about you (i.e. your personal data) is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you have any questions in relation to this Notice, please contact us at the contact details found at the end of this Notice.

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.

In this Notice, references to “data protection legislation” refers to the UK legislation in force from time to time (including the General Data Protection Regulation and the UK Data Protection Act 2018).

This website is not intended for children and we do not knowingly collect data relating to children.

### Scope of Notice

This Notice applies to our processing (as a ‘data controller’) of your personal data in relation to the provision of any of our products and/or services, including:

- when you use our websites (including our associated sites).
- when you request information from us;
- when you engage with us in relation to the provision of our services or supply of products;
- when you register for events or newsletter/updates from us;
- where you apply for a job or work placement.



## The data we collect about you

We, or linked third party sites, 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, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes job title, business address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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, and other technology on the devices you use to access this website.
- **Profile Data** includes the username and password made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, and your communication preferences.
- **Careers and Recruitment data** includes information about your education, employment, nationality and state of health. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions.

We also collect, use and share 'Aggregated Data' such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will 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.

Unless required for recruitment, we do not collect any 'special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## How your personal data is collected

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

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this data by using cookies and other similar technologies. We may also receive technical

data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

- **Third parties or publicly available sources.** We will receive data about you from various third parties and public sources as set out below:

Technical data from the following parties:

- analytics providers such as Google based outside the UK;
  - advertising and social media networks which may be outside the UK; and
  - identity and Contact Data from data brokers or aggregators which may be based outside the UK;
  - identity and Contact Data from publicly available sources such as Companies House.
- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - enquire about our products or services;
    - subscribe to our publications;
    - request marketing to be sent to you;
    - customer surveys;
    - engage with us at trade events;
    - visit our facilities (see below); or
    - report a problem, give us feedback or contact us.

When visiting our sites, you will note that we have security measures in place, including CCTV and building access controls. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).

We require visitors to our offices or facilities to sign in at reception or security guard house and keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need to know basis (e.g. to look into an incident).

### How we use your personal data

We will only use your personal data in compliance with data protection legislation. 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 obligation; and/or
- where you have given your specific consent for us to use such personal data.



Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us. Please contact us using the following email address or contact details detailed at the end of this Notice - [enquiries@sterlingpsl.com](mailto:enquiries@sterlingpsl.com)

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases (under the data protection legislation) 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 personal 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 in the table below. California Consumer Privacy Act categories are parenthesized in the “Types of data” column.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (Identifiers) (b) Contact (Identifiers)	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (Identifiers) (b) Contact (Identifiers) (c) Financial (Cal. Customer Records categories) (d) Transaction (Commercial) (e) Marketing and Communications (Internet Activity)	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (Identifiers) (b) Contact (Identifiers) (c) Profile (Identifiers) (d) Marketing and Communications (Internet Activity)	(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 study how customers use our products/services)
To enable you to complete a customer survey	(a) Identity (Identifiers) (b) Contact (Identifiers) (c) Profile (Identifiers) (d) Usage (Internet Activity & Commercial) (e) Marketing and Communications (Internet	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

	Activity)	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (Identifiers) (b) Contact (Identifiers) (c) Technical (Internet Activity)	(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 deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (Identifiers) (b) Contact (Identifiers) (c) Profile (Identifiers) (d) Usage (Internet Activity & Commercial) (e) Marketing and Communications (Internet Activity) (f) Technical (Internet Activity)	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (Internet Activity) (b) Usage (Internet Activity & Commercial)	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (Identifiers) (b) Contact (Identifiers) (c) Technical (Internet Activity) (d) Usage (Internet Activity & Commercial) (e) Profile (Identifiers) (f) Marketing and Communications (Internet Activity)	Necessary for our legitimate interests (to develop our products/services and grow our business)



## Who we share your personal data with

We may share your personal data with the following categories of recipients:

### **Related entities**

Your personal data will be used by us and may be disclosed to our group companies.

### **Service providers**

In order to provide our products and services, we work with service providers who may, in the course of providing their services, receive and process personal data on our instruction and on the basis of a contractual data processing agreement.

### **Professional advisors and auditors**

We may disclose your personal data to professional advisors (such as legal advisors and accountants) or auditors for the purpose of providing professional services to us.

### **Regulatory bodies/industry bodies**

We may disclose your personal data to a regulatory authority, government agency or law enforcement body with jurisdiction over our activities.

### **Replacement providers**

In the event that we sell or buy any business assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. If Sterling or substantially all of its assets are acquired by a third party, personal data held by us about our clients will be one of the transferred assets.

## How we safeguard your personal data

We care about protecting your personal data. We are committed to taking all reasonable and appropriate precautions and steps to protect the personal data that we hold from misuse, interference and loss, unauthorised access, modification or disclosure.

We do this by having in place a range of appropriate technical and organisational measures, including, for example, the protection of passwords using industry standard encryption, measures to preserve system security and prevent unauthorised access, and back-up systems to prevent accidental or malicious loss of data.

We may use third party data storage providers to store personal data electronically. We take reasonable steps to ensure this information is held as securely as information stored on our own equipment.

Unfortunately, there is always risk involved in sending information through any channel over the internet. If you send information over the internet, this will be entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which



you transmit to us over the internet.

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 instruction, 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. If you suspect any misuse or loss of or unauthorised access to your personal data, please let us know immediately. Details of how to contact us can be found at the end of this Notice.

### How long we keep your personal data

We will not keep your personal data for longer than is necessary for the purposes for which we have collected it, unless we believe that the law or other regulation requires us to keep it (for example, because of a request by a tax authority or in connection with any anticipated litigation) or if we require it to enforce our agreements. The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods.

In determining the appropriate retention period for different types of personal data, the amount, nature, and sensitivity of the personal data in question, as well as the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means are considered.

Once we have determined that we no longer need to hold your personal data, we will delete it from our systems. While we will endeavour to permanently erase your personal data once it reaches the end of its retention period, some of your personal data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists in the electronic ether, our employees will not have any access to it or use it again.

### Your rights

Under data protection legislation, you have various rights in relation to your personal data which we hold, as set out below. If you wish to exercise any of these rights, please contact us using the contact details found at the end of this Notice. Your authorised agent may also contact us on your behalf. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise. We may also 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.

#### Right to object

This right enables you to object to us processing your personal data where we do so for one of the following reasons:

- because it is in our legitimate interests to do so (for further information please see the section on



our legal bases for processing below);

- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; or
- for scientific, historical, research, or statistical purposes.

### **Right to withdraw consent**

Where we have obtained your consent to process your personal data for certain activities (for example, for marketing), you may withdraw this consent at any time and we will cease to use your personal data for that purpose unless we consider that there is an alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.

### **Data Subject Access Requests**

You may ask us for a copy of the information we hold about you at any time, and request us to modify, update or delete such information. You may also ask us to provide a schedule of your personal information that we disclosed to other parties and the nature of those parties. If we provide you with access to the foregoing information, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so.

### **Right to erasure**

You have the right to request that we “erase” your personal data in certain circumstances. Normally, this right exists where:

- the data is no longer necessary;
  - you have withdrawn your consent to us using your data, and there is no other valid reason for us to continue;
  - the data has been processed unlawfully;
  - it is necessary for the data to be erased in order for us to comply with our obligations under law;
- or
- you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so. When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

### **Right to restrict processing**

You have the right to request that we restrict our processing of your personal data in certain circumstances, for example if you dispute the accuracy of the personal data that we hold about you or you object to our processing of your personal data for our legitimate interests. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

### **Right to rectification**

You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the





rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

### **Right of data portability**

If you wish, you have the right to transfer your personal data between service providers. In effect, this means that you are able to transfer the details we hold on you to another third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data. Alternatively, we may directly transfer the data for you.

### **Right to complain**

You also have the right to complain to your applicable data protection authority. Contact details for data protection authorities in the UK are available at: [www.ICO.org.uk](http://www.ICO.org.uk).

### **Non-discrimination**

We will not discriminate against you for exercising your data subject rights. Your request may prevent us from being able to provide you with certain services, however. For example, we may be unable to contact you if you request that we delete your contact information.

### **Storage and transfer of your data internationally**

In order for us to carry out the purposes described in this Notice, your data may be transferred to the following recipients located outside of your jurisdiction:

- to third parties (such as advisers and suppliers/service providers to Sterling); or
- to a cloud-based storage provider.

We will only make cross border transfers in compliance with data protection legislation and the means of transfer provides adequate safeguards in relation to your personal data.

To ensure that your personal data receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with.

### **Cookies**

Cookies are small data files sent by a website to your computer that are stored on your hard drive when you visit certain online pages of our website.

Please click [here](#) to read our [Cookie Policy](#).

### **California Consumers: Opting Out of the Sale of Personal Information**

We do not exchange your personal information with third parties in exchange for financial consideration. Our website does, however, use certain third-party integrations to measure the effectiveness of advertising, collect analytics, increase social media engagement, and operate and improve our website; the use of these third-party integrations may qualify as “sales” of internet activity



under the California Consumer Privacy Act. California consumers may contact us or adjust their preferences on our website to opt out of such “sales.”

### Contact details

If you have any questions, comments or complaints about our use of your personal data, please contact us using the following contact details:

FAO - General Counsel, Sterling Place, Dudley, Cramlington, Northumberland, NE23 7QG, United Kingdom. Telephone: +44 (0) 191 250 0471.

Alternatively, you can send an email to [enquiries@sterlingpsl.com](mailto:enquiries@sterlingpsl.com).