

Privacy Policy

This is the Privacy Policy (the “**Policy**”) of **Microbial Genomics Ltd**(Company Number: 11649075), 168 Church Road, Hove, East Sussex, BN3 2DL (hereafter “**MGL**”, “**we**” or “**us**”). This Policy describes the ways in which MGL collects and uses information about you when you visit our website at <https://microbesng.com/>(the “**Website**”) or order any services from us such as microbial sequencing (the “**Services**”).

MGL may change this Policy at any time in which case we shall notify you of any changes to this Policy. The changes will apply to your use of the Website and/or Services (as applicable) after we have given notice. If you do not wish to accept the new Policy you should not continue to use the Website and/or Services (as applicable). If you continue to use the Website and/or Services (as applicable) after the date on which the change comes into effect, your use of the Website and/or Services (as applicable) indicates your agreement to be bound by the new Policy.

For the purposes of data protection legislation, MGL is the controller for the processing of your personal data. MGL has notified the Information Commissioner’s Office (“**ICO**”) of its processing of personal data. MGL’s registration number is 11649075.

This Policy was last changed in November 2022.

SECTION A – Your use of the Website

1. **Information which is collected when you use the Websites:** MGL may collect the following information from you via the Website if you choose to contact us via the Website, namely your name, e-mail address, phone number and address, together with such other details that you choose to provide us with. Where you provide information about another individual (for example the name and e-mail address of a grant holder) you confirm that you have the consent of that individual to provide such details to us.
2. **Processing ground:** MGL relies on the contractual necessity processing ground to collect the items of information listed in paragraph 1 above, as this information is required in order for MGL to answer your particular query or quote request.
3. **How the information about you on the Websites is used:** The information about you described in paragraph 1 is used by MGL to provide a quote to you and/or answer your particular query.

SECTION B - Your use of any Services

4. **Information which is collected when you ask us to perform any Services for you:** MGL may collect the following information when you instruct us to perform any Services for you:
 - a. your contact name, e-mail address, phone number and address; and
 - b. whilst not (generally speaking) personal data, the details relating to your particular biological sample, including any metadata in relation to such sample that you wish use to analyse in the context of performing the Services. In some instances such samples may contain traces of human DNA in which case MGL will be processing personal data in respect of such DNA.
5. **Processing ground:** MGL relies on the contractual necessity processing ground to process the information collected from you as set out in paragraph 4 above. This is because MGL requires your contact details in order to provide the Services to you, including the results obtained as a result of performing the Services on the sample data as provided to us under paragraph 4(b).
6. **How the information about you when you ask us to perform any Services is used:** The information about you described in paragraph 4 may be used by MGL as follows:
 - a. to enable MGL to provide the Services to you;
 - b. to prevent fraud or illegal activities; and
 - c. to use such information in anonymised form for its own research and marketing purposes.

SECTION C - General

7. **Sharing information with third parties:** MGL shall not pass your information to any third party (other than as described in this paragraph). Your information may, subject to MGL’s obligations to comply with applicable data protection legislation, be shared with the following third parties:
 - a. Amazon web services;
 - b. subcontractors which MGL uses from time-to-time to assist in its provision of the Services, currently A&M AgriLife Research, a member of the Texas A&M University System, and an agency of the State of Texas;
 - c. having taken precautions to maintain the security of such information, MGL may share this information with its regulator;

- d. in anonymised form, MGL may share the information with any third party, in relation to the sale of some or all of MGL's business, or its assets, or as part of any business restructuring or reorganisation. MGL will take steps with the aim of ensuring that your rights continue to be protected if your personal data is transferred in accordance with this paragraph;

or

- ii. law enforcement agencies in compliance with law enforcement.

8. Links to third party websites and third party adverts: MGL is not responsible for the privacy policies and practices of other sites even if you access them using links from the Website. You should check the policy of each site you visit and contact its owner or operator if you have any concerns or questions. In addition, if you link to the Website from a third party site or via a social network (e.g. Twitter), MGL is not responsible for the privacy policies and practices of the owners or operators of that third party site and recommends that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

9. Security: MGL has implemented technology and policies to safeguard your privacy from unauthorised access and improper use.

10. Storage and Data Retention: Your information is stored by us, via our third party storage provider, in the European Union. Our other third party partners may store data outside the EEA and we have appropriate contracts in place to ensure adequacy of such transfer. You can ask for your information to be removed at any time by e-mailing us at info@microbesng.com.

SECTION D – Contact and Your rights

11. MGL Details: If at any time you would like to contact MGL you can do so by sending an e-mail to us at info@microbesng.com or write to us at "Data Protection Query, Microbial Genomics Limited, 168 Church Road, Hove, East Sussex, BN3 2DL". This is MGL's registered address and we are a company incorporated in England and Wales with company number 11649075.

12. Your Rights: You can contact us using the details set out in the paragraph above if you wish to: (i) access a copy of the personal data that

we hold about you; (ii) correct any items of personal data that we hold about you; and/or (iii) have any items of personal data that we hold about you erased or object to our processing of such items of personal data. You may also [contact](#) the ICO at any time. MGL's EU Representative is Rune Pettersen, Coolharbour Roundwood Co Wicklow, A98 FY68, Ireland who may be contacted via eurep@fifthsquare.eu.

