

AXISBIOTIX LIMITED

CONSUMER STUDY APPLICANT AND PARTICIPANT PRIVACY POLICY

1. INTRODUCTION

1. In this Privacy Policy:

- 1.1. references to **we, us** or **our** means **AXISBIOTIX LIMITED**, a company incorporated and registered in England and Wales (No. 12276227), whose registered office is 15 Silk House Park Green, Macclesfield, England, SK11 7QJ. We are part of a group of companies (**SkinBio Group**) and we operate from the address shown in the '**How to contact us**' section below. Your personal information will be held by AXISBIOTIX Limited;
- 1.2. references to **you** or **your** means any individual who is an Applicant to our Consumer Study and any Participant in our Consumer Study (all as defined below);
- 1.3. references to **Applicant** means any individual who registers to participate in our Consumer Study via our Website (and references to **Applicants** shall be construed accordingly);
- 1.4. references to **Consumer Study** means our consumer study relating to assess consumer attitudes and experience of the AxisBiotix's food supplement and how it impacts an individual's lifestyle, perception and feel/experience on their skin.
- 1.5. references to **Mobile App** means our mobile application which is made available to Participants;
- 1.6. references to **Participant** means any Applicant who is selected by us and agrees to participate in the Consumer Study (and references to **Participants** shall be construed accordingly);
- 1.7. references to **Website** means the website found at <https://axisbiotix.com> (as amended from time to time).

2. PRIVACY POLICY

- 2.1. This policy (together with any other documents referred to on it) sets out the basis on which we collect and use personal information about you through:
 - 2.1.1. your use of the Mobile App;
 - 2.1.2. your use of the Website;
 - 2.1.3. e-mail;
 - 2.1.4. over the telephone; or
 - 2.1.5. otherwise in connection with the Consumer Study.
- 2.2. This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, the nature of the personal information we collect and how we will use it. We will also set out who we disclose it to and your rights and choices in relation to your personal information.
- 2.3. In this Privacy Policy where we use the words **personal information** we use these words to describe information that is about you and which identifies you.
- 2.4. You have the **right to object** to our use of your personal information in certain circumstances. Please see the **Your rights** section below for a summary of your right to object (along with your other rights under data protection law) and the details of who to contact if you want to exercise them. Please see the **How to contact us** section if you need to get in touch.
- 2.5. The Consumer Study is not intended for children and we do not knowingly collect personal information relating to children.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

- 3.1. We are the **controller** for the purpose of data protection law, in respect of your personal information collected and used through your use of the Mobile App, the Website, via e-mail, over the telephone and otherwise in connection with the Consumer Study and it applies whether you are an Applicant or a Participant.
- 3.2. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

- 4.1. We collect and use personal information about you in the course of your application to take part in the Consumer Study as an Applicant and your role, if selected, as a Participant in the Consumer Study. You will also provide us with your personal information. We may also collect certain personal information from you via our Mobile App, Website or when you choose to interact with us. The personal information we collect is described in the table below.

4.2. Information you provide to us

The information you provide to us may include:

Type of Personal Information	Examples
Consumer Study	
Registration details and contact information.	Name, address, email address, username and password for access to our Mobile App, age range, gender, ethnicity, information relating to current health (including existence of any skin conditions).
Feedback you provide in relation to the products that you are using as part of the Consumer Study.	Your opinion on the effectiveness of the products you use as part of the Consumer Study, any impact they have on your health (including your skin), and any photographs you provide showing how you consider that the products have affected your skin.
General	
Details of complaints and compliments you make.	Name, address, e-mail address, details about the service you received/your experience.
Marketing Preferences	
Information about you enabling us to provide relevant material and details about our products and services.	Contact information that is collected when you apply to participate in the Consumer Study. This information may also be collected via e-mail, from our Mobile App, and from our Website.
Marketing preferences, marketing activities and feedback.	Marketing preferences, or responses to voluntary satisfaction surveys. To improve our marketing communications, we may collect information about interaction with, and responses to, our marketing communications.
Other	

Type of Personal Information	Examples
Technical Information.	Technical Information from any device you use to access our Mobile App or Website, such as your login details, e-mail address, your network information which is information from your device such as your IP addresses, internet service providers, location information and device information.
Through our use of cookies on our Mobile App or Website.	<p>Cookies are pieces of information stored directly on the device you are using. Cookies allow us to recognise your device and to collect information such as internet browser type, time spent using the Mobile App or Website and pages visited.</p> <p>Please see our Cookies Policy which can be accessed here https://axisbiotix.com/cookies/ for further details on how we use cookies on our Mobile App or Website.</p>
Demographic information such as your postcode.	Demographic information provided from you directly when you provide information about your interests and preferences on our Website.

This includes information you provide:

- a) when you fill in forms on the Website;
- b) when you provide feedback as part of the Consumer Study on the Mobile App; and
- c) in communications between us, including e-mails, letters and agreements.

4.3. Information we collect from you

- a) technical information (including your login information for the Mobile App) and, to the extent that they constitute personal information, the IP address you use to connect your device to the internet and the browser type and version you use on your device);
- b) information collected from forms you complete; and
- c) information contained in and records of communications between you and us, including emails and letters.

4.4. Information we receive from other sources and or publicly available sources such as:

- a) social media platforms such as Twitter and LinkedIn; and
- b) analytics providers such as those that provide cookies or similar technologies on the Mobile App and on the Website based inside outside the European Economic Area;

We collect identity and contact information about you from the above, and any other available sources (as updated from time to time).

5. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

5.1. We use your personal information in connection with the Consumer Study. Under data protection law we can only use your personal information if we have a proper reason to do so (this is also known as a legal basis). Examples of where we have a legal basis include when:

- 5.1.1. we have your **consent**;
- 5.1.2. it is **necessary to enter into or perform a contract** with you (or to take steps at your request prior to entering into that contract);

- 5.1.3. it is necessary to comply with a **legal obligation**;
- 5.1.4. it is necessary in order to **protect your vital interests** or
- 5.1.5. it is in our **legitimate interests**.

5.2. Where we rely on our **legitimate interests** we mean our:

- 5.2.1. pursuit of our commercial activities and objectives, or those of a third party;
- 5.2.2. compliance with applicable legal and regulatory obligations and any codes of conduct;
- 5.2.3. improvement and development of our business operations and service offering, or those of a third party; or
- 5.2.4. protection of our business, shareholders, employees and customers, or those of a third party.

5.3. We have set out our reasons for using your personal information in the table below under the heading **Legal Basis**. Where we rely on our legitimate interests, we have set out those interests in the table below.

5.4. You have the **right to object** to our use of your personal information at any time. Please see the **Your rights** section below for a summary of your right to object and the details of who to contact if you want to exercise them. Please see the **How to contact us** if you need to get in touch.

Purpose	Legal Basis
To communicate with you in connection with the Consumer Study.	<p>Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business.</p> <p>Necessary to enter into or perform a contract we have with you.</p>
To evaluate any feedback you provide in connection with the Consumer Study.	<p>Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business.</p>
To manage complaints and queries and provide customer support in relation to the administration and management of the Consumer Study.	<p>Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business.</p>
To improve the quality of the Mobile App or the Website and your experience using the Mobile App or the Website.	<p>Legitimate interests. We require your personal information to enhance, modify and personalise the Mobile App and the Website and your general experience for your benefit or the benefit of the other users.</p>
To perform any contract entered into with you to fulfil your orders for any of our products and the process payment for those orders.	<p>Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business.</p> <p>Necessary to enter into or perform a contract we have with you or the Customer.</p>
To perform any contract entered into with you to fulfil your rewards for participating in the Consumer Study.	<p>Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business.</p> <p>Necessary to enter into or perform a contract we have with you or the Customer.</p>

Purpose	Legal Basis
To comply with any legal or regulatory obligations (including in connection with a court order).	Necessary for compliance with a legal obligation to which we are subject.
To provide you with information about the products and services we offer (including newsletters, details of any events, promotions and new products and services we can offer and which we believe may be of interest to you) in accordance with any specified preferences.	Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business. Consent.
To engage with you via social media.	Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business. Consent.
To analyse and improve our products and services and to evaluate and develop our business.	Legitimate interests. We require your personal information in order to enable us to manage and carry out our operations as a business.
To undertake security monitoring against email traffic to detect, investigate and resolve security threats.	Legitimate interests. We process your personal information in order to enable us to protect our business operations

- 5.5. Where we process your personal information on the legal basis of our **legitimate interests** (as set out in the table above), we have carefully considered and assessed your rights and freedoms which require protection of your personal information in respect of each specific purpose. Having undertaken this assessment, we have determined that our legitimate interests are not overridden by your rights under data protection laws. If you would like further information about how we have balanced your rights and freedoms against our legitimate interests, please get in touch using the details at the **How to contact us** section below.
- 5.6. We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. If you do not provide the relevant personal information to us, we will not be able to provide the products or services to you, or to arrange payments.
- 5.7. If you wish to change your marketing preferences and you do not wish to hear from us, please let us know by contacting us on the details provided in paragraph 15.1 below.

6. WHAT SENSITIVE PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

- 6.1. We may also collect certain sensitive personal information (including any special categories of personal data) from you. This may include information concerning your:
- a) racial/ethnic origin; and
 - b) health information.
- 6.2. When we process your sensitive personal information, we will rely on either of the following legal bases:
- a) your explicit **consent**; or
 - b) one or more of the other legal bases set out in the table above and the use is **necessary for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity** (for example, when a court issues a court order requiring the processing of your sensitive personal information).

6.3. Where we use certain elements of your sensitive personal information (for example, racial or ethnic origin or health data to carry out equal opportunities monitoring) we do so in reliance on the **equality of opportunity or treatment** legal basis. We only report on this in a non-attributable and aggregated manner.

7. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?

7.1. You agree that we may share your personal information with:

Type of third party	Examples
General	
Our group companies.	Other companies and entities that are part of the SkinBio Group.
Our service providers.	<p>Our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you for example:</p> <ul style="list-style-type: none"> ○ our Mobile App host STCS Limited; ○ our Website host Halogen Design Limited; ○ our IT systems providers Easy Web Sites Limited; ○ our IT cloud services solution Tresorit AG; ○ our data analysis service provide Datitude Limited; and ○ our courier services providers. <p>A current list of these third party service providers with whom we share your personal information can be provided to you on request using the details at paragraph 15 below.</p>
Our professional advisers.	Including accountants, lawyers and other professional advisers that assist us in carrying out our business activities, a current list of these third parties can be provided to you on request using the details at paragraph 15 below.
Regulatory authorities, government agencies or law enforcement bodies.	We may disclose your personal information where these bodies have jurisdiction over our activities.

7.2. We may share your personal information with other third parties, for example:

- 7.2.1. in the event that we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
- 7.2.2. if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets; and
- 7.2.3. if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our legal rights under any contract we have with you.

8. SHARING WITH THIRD PARTIES AND COMPANIES WITHIN THE SKINBIO GROUP

8.1. Where we act as an independent controller of your personal information we will use your personal information for our own purposes. Sometimes third parties and other companies in the SkinBio

Group will act as controllers of your personal information that we collect. This is where they determine the purposes and means of processing your personal information. They will use your personal information for their own legitimate purposes as described in this privacy notice.

9. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

- 9.1. We will process your personal information only within the EEA.
- 9.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

10. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

- 10.1. We will retain your personal information for no longer than is necessary for the purposes for which the personal information are processed. The length of time we hold on to your personal information will vary according to what that information is and the reason for which it is being processed.
- 10.2. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means. We also consider any applicable legal, regulatory, tax, accounting or other requirements which may specify how long we should retain your personal information for.
- 10.3. Subject to the above, personal information about our Applicants and Participants will be retained by us for two years from the later of, the date of you applied to take part in the Consumer Study or the end of your participation in the Consumer Study to allow us to respond to any queries or complaints you may have.
- 10.4. For further information about how long we keep your Personal Information, please get in touch using the details at the **How to contact us** section below.

11. YOUR RIGHTS

You have certain rights with respect to your personal information. The rights will only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights and who to contact to exercise them.

Summary of your rights	
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you and information about how we use it, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.

Summary of your rights	
Right to erasure of your personal information	<p>You have the right to ask that your personal information be deleted in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; • if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; • if you object to the use of your personal information (as set out below); • if we have used your personal information unlawfully; or • if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	<p>You have the right to suspend our use of your personal information in certain circumstances. For example:</p> <ul style="list-style-type: none"> • where you think your personal information is inaccurate but only for so long as is required for us to verify the accuracy of your personal information; • the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; • we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or • you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	<p>You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.</p> <p>The right only applies:</p> <ul style="list-style-type: none"> • to personal information you provided to us; • where we rely on the following legal bases: <ul style="list-style-type: none"> • consent; or • for the performance of a contract; and • when the use of your personal information is carried out by automated (i.e. electronic) means.

Summary of your rights	
Right to object to the use of your personal information (including to object to direct marketing, automated decision making and profiling)	<p>You have the right to object to the use of your personal information in certain circumstances and subject to certain exemptions. For example:</p> <ul style="list-style-type: none"> • where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); • if you object to the use of your personal information for direct marketing purposes; and • where we use your personal information to take a decision which is based solely on automated processing where that decision produces a legal effect or otherwise significantly affects you.
Right to withdraw consent	<p>You have the right to withdraw your consent at any time where we rely on consent to use your personal information.</p>
Right to complain to the relevant data protection authority	<p>If you think that we have processed your personal information in a manner that is not in accordance with data protection law, you can make a complaint to the data protection regulator. In the UK this is the Information Commissioner's Office (ICO) and they can be contacted on 0303 123 1113 or please see www.ico.org.uk. If you live or work in an EEA member state, you may complain to the regulator in that state.</p>

12. HOW TO COMPLAIN

- 12.1. If you think there is a problem with how your personal information is being handled, please contact us by using the contact details below.
- 12.2. You also have the right to complain to the Information Commissioner's Office who can be contacted on 0303 123 1113. Please also see www.ico.org.uk.

13. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, we will give you reasonable notice of any changes.

14. HOW TO CONTACT US

- 14.1. If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by:
- 14.1.1. telephone on 0161 468 2760;
 - 14.1.2. email at info@axisbiotix.com; or
 - 14.1.3. post at 15 Silk House, Park Green, Macclesfield, SK11 7QJ.

This Privacy Policy was last updated on 21 December 2020.