

Privacy policy

Acellera is committed to protecting our customer privacy and takes its responsibility regarding the security of customer information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as a customer and through your use of our website, mobile applications and online services;
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- And how we comply with the data protection rules.
- All personal data is collected and processed in accordance with Spanish and EU data protection laws.

“Acellera” (referred to as “we”, “us”, “our” or “Acellera” in this policy) in this policy primarily refers to Acellera Ltd and Acellera Labs SL. Acellera Labs SL is the “data controller” of all personal information that is collected and used about Acellera customers for the purposes of [Ley Orgánica 15/1999 de 13 de diciembre de Protección de Datos de Carácter Personal]. Acellera Ltd is registered in UK with registration number GB972786465 and Acellera Labs SL registered in Spain with registration number B65925323.

What personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and information about your access to our website.

We may collect personal data from you when you buy our products, you request information on our products, you contact our technical support, you register to our newsletter or online tools, participate in a survey or competition, when you participate to event organized by Acellera, or when you contact us.

Specifically, we may collect the following categories of information:

- a. Name, business address, e-mail address, telephone number
- b. Information about your purchases to Acellera
- c. Information about your use of our websites and/or Applications
- d. The communications you exchange with us or direct to us via letters, emails, chat service, calls, and social media.

What do we use your personal data for, why and for how long

Your data may be used for the following purposes:

- a. Providing products and services you request: we use the information you give us to perform the services you have asked for in relation to your purchase or any information, including commercial, request.

b. We use your payment information for accounting, billing and audit purposes and to detect and / or prevent any fraudulent activities;

c. Administrative or legal purposes: we use your data for statistical and marketing analysis, systems testing, customer surveys, maintenance and development, or in order to deal with a dispute or claim. Note that we may perform data profiling based on the data we collect from you for statistical and marketing analysis purposes. Any profiling activity will be carried out with your prior consent only and by making best endeavours to ensure that all data it is based on is accurate. By providing any personal data you explicitly agree that we may use it to perform profiling activities in accordance with this Privacy Policy;

d. Customer Services communications: we use your data to manage our relationship with you as our customer and to improve our services and enhance your experience with us;

h. Provide tailored services: we use your data to provide information we believe is of interest to you, prior to, during, and after you contact us, you join our groups in social networks, you register to our mailing list and applications or you use the applications we offer to the community and to personalise the services we offer to you, such as special offers.

i. Marketing: from time to time we will contact you with information regarding new products via e-communications. You will have the choice to **opt in or opt out** of receiving such communications by indicating your choice. You will also be given the opportunity on every e-communication that we send you to indicate that you no longer wish to receive our direct marketing material.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.

In most cases we will need to process your personal data so we can enter into our contract for services with you.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation;
- You have consented to us using your personal data (e.g. for marketing related uses);
- It is in our legitimate interests in operating as a software provider company (e.g. for administrative purposes).

Only children aged 16 or over can provide their own consent. For children under this age, consent of the children's' parents or legal guardians is required.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations or to deal with complaints, queries and to protect our legal rights in the event of a claim being made.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and

if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

Security of your personal data

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Spanish and EU law on data protection rules.

Sharing your personal data

Your personal data may be shared with other companies (resellers or commercial partners).

We may also share your personal data with the following third parties for the purpose described in this Privacy Policy:

- a. Government authorities, law enforcement bodies for compliance with legal requirements;

- c. Partners required to deliver the products or services you have asked for;

d. Trusted service providers we are using to run our business such cloud service and e-mail marketing service providers assisting our marketing team with running customer surveys and providing targeted marketing campaigns;

f. Legal and other professional advisers, law courts and law enforcement bodies in all countries we operate in in order to enforce our legal rights in relation to our contract with you;

h. Social media: You may be able to access third party social media services through our website or App or before coming to our website or App. When you are registered with your social service account, we will obtain the personal information you choose to share with us through these social media services pursuant to their privacy settings in order to improve and personalize your use of our website or App. We may also use social media plugins on our website or App. As a result your information will be shared with your social media provider and possibly presented on your social media profile to be shared with others in your network. Please refer to the privacy policy of these third-party social media providers to find out more about these practices.

Cookies and site tracking

This site uses cookies to enable us to improve our service to you and to provide certain features that you may find useful. This may include cookies of media and advertising partners that are being placed on your machine when visiting our website or App. Please visit our partners' websites for information on their privacy and cookie policy.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable us to recognise your browser and help us to track visitors to our site; thus enabling us to understand better the products and services that will be most suitable to you. A cookie contains your contact information and information to allow us to identify your computer when you travel around our site for the purpose of helping you accomplish your reservation. Most Web browsers automatically accept cookies, but, if you wish, you can change these browser settings by accepting, rejecting and deleting cookies. The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to change these settings, you may find that certain functions and features will not work as intended. The cookies we use do not detect any information stored on your computers.

For more information about cookies and how to stop cookies being installed visit the following website: <http://www.allaboutcookies.org>.

We use tracking software to monitor customer traffic patterns and site usage to help us develop the design and layout of the websites. This software does not enable us to capture any personal information.

Your Data Protection Rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Object to automated decision-making including profiling**, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- **Withdraw consent.** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for

the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to exercise any of these rights, then please contact our DPO by email at info@acellera.com or by post at Acellera' Labs SL, C/Dr. Aiguader 88, 08003 Barcelona, Spain.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Changes to Privacy Policy

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website.