

# **Privacy**

#### Who we are

"CancerTools.org" is the trading name of Cancer Research Technology Limited's diagnostic tools and tools business. Any use of "we", "us" or "our" in this document means or refers to Cancer Research Technology Limited, a company registered in England and Wales under company number 1626049 with its registered office at 2 Redman Place London, E20 1JQ ("CRT"). CRT provides and is responsible for www.cancertools.org.

In our ongoing commitment to protecting your privacy, the following policy is designed to give you information on which of your information we collect in providing services to you, how we store it and how we use it.

#### **HOW WE COLLECT INFORMATION ABOUT YOU**

We collect information in the following ways:

## Information you provide to us directly

You may give us your information in order to register on our website, download material or otherwise communicate with us.

When you use our website, we collect your personal information using "cookies" and other tracking methods. There are more details on the cookies and tracking methods we use in our Cookie Policy.

In addition, in accordance with common website practice, we will receive information about the type of device you're using to access our website or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

## Information you provide to us indirectly

Your information may be shared with us by third parties, for example if you are a researcher and your information is shared with us by the principal investigator, institution, through an event or professional organisation.

We also may receive data about you from subcontractors acting on our behalf who provide us with technical, payment or delivery services, and from business partners, advertising networks and search/analytics providers used on our website.

You should check any privacy policy provided to you where you give your data to a third party.

#### Information from other sources

We also use information from the following sources:



#### Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those services.

Information available publicly

We supplement information on our contacts with information from publicly available sources such as non-profit professional organisation, websites and annual reviews, corporate websites or public social media accounts.

## WHAT PERSONAL INFORMATION WE COLLECT

We collect, store and use the following kinds of personal information:

- your name;
- your contact details (including postal address, telephone number, e-mail address and/or social media identity);
- your (or your company's or institution's) bank details and/or credit card details where you provide these to make a payment;
- if submitting a research tool for inclusion in this website catalogue, whether you are a member of a relevant scientific organisation or institution;
- if submitting a research tool for inclusion in this website catalogue, the research areas you are involved in, the cancer types you carry out work in connection with, and any relevant tools involved in your research;
- information about your activities on our website and about the device you use to access these, for instance your IP address and geographical location; and
- information about events, activities and products which we consider to be of interest to you.

#### **HOW WE USE YOUR INFORMATION**

We will use your personal information to:

- provide you with the services, products or information you asked for;
- keep a record of your relationship with us;
- respond to or fulfil any requests, complaints or queries you make to us;
- understand how we can improve our services, products or information by conducting analysis and market research;
- manage our events;
- register, administer and personalise online accounts when you sign up to products we have developed:
- send you correspondence and communicate with you;
- if submitting a research tool for inclusion in this website catalogue, to build a public profile page for the applicable research tool;
- administer our websites and to troubleshoot, perform data analysis, research, generate statistics and surveys related to our technical systems;
- testing our technical systems to make sure they are working as expected;
- generate statistics related to sales via the website;



- contact you if enter your details onto one of our online forms, and you don't 'send' or
  'submit' the form, to see if we can help with any problems you may be experiencing with the
  form or our websites;
- display content to you in a way appropriate to the device you are using (for example if you are viewing content on a mobile device or a computer);
- generate reports and publish publications on our work, services and events;
- conduct due diligence;
- monitor website use to identify visitor location, guard against disruptive use, monitor website traffic and/or personalise information which is presented to you;
- conduct training and quality control;
- audit and administer our accounts;
- meet our legal obligations, for instance to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies;
- carry out fraud prevention and money laundering checks;
- undertake credit risk reduction activities; and/or
- establish, defend or enforce legal claims.

#### HOW WE USE YOUR INFORMATION TO TELL YOU ABOUT OUR WORK

## **Sending marketing communications**

Our marketing communications include information about our partnerships, new products, updates on our work, latest breakthroughs, campaigns and lifesaving work of CRUK. Occasionally, we may include information from partner organisations or organisations who support us in these communications. We operate an 'opt-in only' communication policy. This means that, except as set out below, we will only send marketing communications to those that have explicitly stated that they are happy for us to do so.

We may use information you have given us directly, for example the record of your previous relationship with us, your location and demographics, as well as the type of activity you have been involved with, to tailor our communications with you about future activities.

#### Managing your contact preferences

We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine, and you can change your preferences at any time. Just let us know when you provide your data or contact us at enquiries@CancerTools.org.

If you've decided you don't want to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include where we are processing your pending requests or your requests for changes to your marketing preferences.

## **LEGAL BASIS FOR PROCESSING**

Data protection laws mean that each use we make of personal information must have a "legal basis". The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.



## **Specific consent**

Consent is where we ask you if we can use your information in a certain way, and you agree to this (for example when we send you marketing material via post, phone, text or e-mail). Where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

## **Legal obligation**

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases we may need to share your information with our various regulators such as the Charity Commission, Fundraising Regulator, or Information Commissioner, or to use information we collect about you for due diligence purposes.

## Performance of a contract / take steps at your request to prepare for entry into a contract

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. An example of this would be if you are buying something from us.

#### Vital interests

We have a basis to use your personal information where it is necessary for us to protect life or health.

## **Legitimate interests**

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our/their "legitimate interests" (provided that what the information is used for is fair and does not unduly impact your rights).

We consider our legitimate interests to include all of the day-to-day activities CRT and CRUK carries out with personal information. Some examples not mentioned under the other bases above where we are relying on legitimate interests are:

- analysis and profiling of our clients using personal information we already hold; and
- use of personal information when we are monitoring use of our website or apps for technical purposes.

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others') interests in us using your information in this way.

When we use sensitive personal information (please see the "What personal information we collect" section above), we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law for using this type of information (for example if you have made the information manifestly public or, in some cases, if it is in the public interest for us to do so).

## How we keep your information safe



We ensure that there are appropriate technical and organisational controls (including physical, electronic and managerial measures) in place to protect your personal details. For example, our network is protected and routinely monitored.

## How long we keep your information for

CRT has specific criteria to determine how long we will retain your information for, which are determined by legal and operational considerations. For example, we are required to keep some personal information for tax purposes, as well as keep a record of your interactions with us.

# Sharing your information with other organisations

As set out in the "Sending marketing communications" section above, we will never sell or rent your information to third parties for marketing purposes. However, we may disclose your information to third parties in connection with the other purposes set out in this policy. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf:
- analytics and search engine providers; and
- IT service providers.

Some of our suppliers run their operations outside the European Economic Area (EEA) - this may include a country which may not be subject to the same data protection laws as companies based in the UK. In these circumstances, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law, and appropriate safeguards are in place.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider this necessary, to protect the rights, property or safety of CRT and CRUK, its personnel, visitors, users or others.

We reserve the right to disclose your personal information to third parties:

- if we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets; and/or
- if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets.

## Keeping your information up to date

We may use information from external sources such as the post office national change of address database and/or the public electoral roll to identify when we think you have changed address so that we can update our records and stay in touch. We only use sources where we are confident that you've been informed of how your information may be shared and used.

We do this so we can continue to contact you where you have chosen to receive marketing messages from us and contact you if we need to make you aware of changes to our terms.

This activity also prevents us from having duplicate records and out of date preferences, so that we don't contact you when you've asked us not to.



We're committed to putting you in control of your data and you're free at any time to opt out from this activity. To find out more, please contact enquiries@CancerTools.org.

We really appreciate it if you let us know if your contact details change.

#### Your rights

Under UK data protection law, you have rights over personal information that we hold about you. We've summarised these below:

Right to access your personal information

You have a right to request access to the personal data that we hold about you. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, send a description of the information you want to see by post to CancerTools.org, 2 Redman Place, London E20 1JQ or by email to enquiries@CancerTools.org.

Right to have your inaccurate personal information corrected

You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.

Right to restrict use of your personal information

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

Right to erasure of your personal information

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions, you have the right for this to be done.

Right for your personal information to be portable

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

Right to object to the use of your personal information

If we are processing your personal information based on our legitimate interests or for scientific/historical research or statistics, you have a right to object to our use of your information.



If we are processing your personal information for direct marketing purposes, and you wish to object, we will stop processing your information for these purposes as soon as reasonably possible.

If you want to exercise any of the above rights, please contact us at CancerTools.org, 2 Redman Place, London E20 1JQ or by email at enquiries@CancerTools.org.

We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's Information Commissioner's Office (ICO).

## **Complaints**

If you are unhappy with any aspect of how we are using your personal information we'd like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. You can contact us via email at enquiries@CancerTools.org or via our contact us page.

You also have the right to lodge a complaint about any use of your information with the Information Commissioners Office, the UK data protection regulator.

# **Changes to this Policy**

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the CancerTools.org website or by contacting you directly.

#### **Contact Us**

If you have any questions, comments or suggestions, please let us know by post at CancerTools.org, 2 Redman Place, London E20 1JQ or by email to enquiries@CancerTools.org.