

Privacy Statement for the Living DNA/NYG&B Summer Education Project

In this Statement we explain what personal information we will collect about you or children who take part in this Education Program, how we will use that information, and how we will protect it. Broadly speaking, personal information is information from which you or your child can be personally identified.

This statement is not intended to be exhaustive; it is intended to provide you (parents and children) with the information about our approach to privacy and data security which we think will be of most relevance to you. If you require further information, or if you have any queries about this statement, please contact us by email at education@livingdna.com.

Our starting point is that each individual (or parent or legal guardian of participants under 18 years of age, as appropriate), is in charge of their DNA. Our role is to carry out DNA tests for the participants, and to provide their results. Within 6 months of our making your child's results available securely online, we will destroy their DNA sample, destroy the records which enable the student to be identified from their barcode, and destroy any of their genetic information held on our system, but not necessarily those held by our laboratory. We will not provide the laboratory any information to enable them to identify who provided the sample.

What information we collect and how we use it

It is important to be aware that once the DNA test has been completed, the information that we will hold about each student will include sensitive information such as information about their ethnicity. We will, until destroyed, hold each student's genetic information, which can reveal a lot about them.

When you sign the application for your child to participate in the Project, and when you set up your online account to access the DNA results, we collect personal information from you such as your name, and your child's name, your telephone number and address. We also retain a record of your online activity through our portal, and a copy of your consent form, and any other communication passing between us. We do this to manage our Education Program, to operate your account, to provide the test results and generally to respond to your queries. **If you do not wish to provide the information requested, please do not complete the application form, as we are unable to offer our Education Program for your child if this information is not available.**

We will use your child's DNA sample to carry out our DNA test, and will analyse the raw data which is produced by that test so as to provide results to you and your child.

We will use your child's data in combination with data from other participants in presentations and lessons as part of the Project, but students' data will be anonymized for this purpose; it will not be possible to identify any student from the material which will be prepared.

We may record any telephone call you make to us for evidential, verification and training purposes, and may retain and access records of the recording.

We may use your personal information to let you know about services which we, or our parent company (DNA Worldwide Group Limited) or any related company are offering where that service is related to DNA testing, related testing or to the use of DNA test results, but we will not make your information

available to any other third party for marketing purposes. We will do this by email. We ask you whether or not you consent to our using your information in this way at the end of this Statement.

We will only use your personal data and that of your child where the law allows us to do so.

Most commonly this is because:

- it is necessary for us to do what we have said we will do in the contract between us in relation to your child's participation in the Education Project.

This is relevant to our processing of your child's DNA sample, genetic data, and test results, your account information, and our records of your child's name and gender, your consent form, correspondence passing between us, and records and recordings of phone calls and like information, attendance information and event planning records.

- you have consented to our processing your information, or your child's information data, and have not withdrawn that consent.

This is relevant to our processing of your child's DNA sample, genetic data, and test results, and where you have provided consent, to our processing of all media which is generated through our filming, photography, and interviews, and to our retaining and using your details to contact you for marketing purposes.

- Because it is necessary in our legitimate interests, where your interests or those of your child do not outweigh our interests.

We have a legitimate interest in properly performing our services and running the Education Project, in maintaining accurate records of the services which we provide, and in being able to demonstrate that we have properly met our obligations. We will also have a legitimate interest in being able to store and publish the media which is generated through our filming, photography and interviewing when the results are provided to the children.

This basis is also relevant to our processing of your account information, our storage of your child's sample, genetic data, test results and your consent forms, our storage of correspondence passing between us or relating to the provision of our services and also to our storage and use of recordings of telephone conversations relevant to the provision of services for your child.

We may also need to process your information to comply with our legal or regulatory obligations. An example of this is that we will retain a record of whether or not you consent to us sending you information about our services.

We will also collect information about people who visit our website, but will not record any information which will enable us to identify you as an individual. For further details of what information is collected, and why, please refer to our Cookie Policy which is available on our website at www.livingdna.com.

How We Keep Personal Information

General Information

General information that you provide to us such as your name, address and information and your child's name will be held by us on our encrypted computer systems in compliance with our ISO:27001 accreditation. We are based in England.

DNA Samples

DNA samples will be sent to a third party laboratory located in Denmark that we have carefully selected to work with us for the purposes of DNA testing.

The laboratory will receive the sample, and a record of your child's gender. Their sample will only be identifiable by a barcode. No personal information regarding any participant will be shared with our lab and all samples are anonymised. We will retain on our systems the information which enables each participant to be identified from the bar code. We will only provide this information to the laboratory in exceptional circumstances, such as where they are required by a competent regulatory authority to provide this information, or where otherwise required by law to do so.

Participants' 'Raw Data'

The basic results of a participants' DNA test, being their genetic data, we refer to as 'raw data' will be stored by us electronically on our encrypted computer systems until we have successfully uploaded the results of their test onto our secure online website for you to access them. We will then destroy the information held on our systems, and any information which links the student to any genetic records maintained by our laboratory.

Who we share information with

We will send each student's DNA sample to a laboratory based in Denmark, Europe for testing. This laboratory has been carefully chosen by us.

We also use agents to assist us to perform our services, and your data or that of your child may be visible to them. Examples of this include that we use an IT consultancy service, and retain other consultants and professional service providers to help us provide our services. From time to time we also use the services of companies to assist us to provide test results.

We only disclose information to these third parties where we have appropriate agreements in place that require the third party to protect privacy of people who take DNA tests with us in accordance with our ISO:27001 accreditations, and where we are satisfied generally with the controls that are in place. Third parties are only permitted to use your information for the purpose of providing their service to us. We strictly limit who has access to DNA data, both within our organisation and externally.

If you consent to your child being filmed, interviewed or photographed, the resultant media will be published on social media and our website. You should assume that it will be made public, and that once made public, that it cannot be retrieved.

Your completed application forms will also be collected by and available to the NYGBS and their team. They will then be scanned and the images held on our computer system. The hard copies will be destroyed. NYGBS personnel will be present when your child receives their results, but we will not provide copies of the results to NYGBS.

We may also share data with third parties if we that we choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If

a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy notice.

How we protect personal information

At the heart of how we protect your information is our commitment to International Standards set by ISO. We are certified to ISO:9001 for quality controls and ISO:27001 for information security. As part of our ISO accreditation, audits and reviews are conducted of all relevant third party service providers to check that they meet our strict requirements.

We use a combination of technical, physical and organisational measures to protect the security of your information.

These include:

Organisational

We have an Information Security and Compliance Management team who are responsible for the overall security of the company, with a designated head who reports directly to the Managing Director.

1. All staff receive ongoing Information Security Training
2. All staff are vetted and security cleared
3. We have a Feedback Reporting system to underpin our commitment to continual review and improvement is subject to regular management review
4. Our processes are audited by external consultants multiple times per year

Physical

We maintain strict access digital entry access controls to our premises, and ensure that the laboratory that we use does the same. All visitors are required to sign information security agreements, and must be escorted by a member of staff.

Our building is monitored with intrusion detection and the windows are covered in one way film stopping the viewing of inside the building from outside.

Technical

Living DNA work closely with their ISO:27001 secure hosting partners to keep all systems as secure as possible. There are multiple levels of intrusion detection, firewalls and server access is restricted on an essential access only basis.

Record Retention

We retain account information for audit and record keeping purposes in line with our internal record keeping policies. We will also retain copies of the applications for students to participate in the Education Program in line with our internal record keeping policies.

Your Rights

Under certain circumstances you may have rights under data protection laws. These include the right to:

- Request access to your or your child's personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Withdraw consent

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

Please contact us using this email address dataprotection@dna-worldwide.co.uk if you need further information on your rights or if you wish to exercise any of your rights

Changes to this Statement

We may change this statement from time to time. If we make material changes that could impact on you, we will advise you when you log into your portal.