

Scottish Brain Sciences Privacy Policy

Your privacy is very important to us. We want you to be confident that the information you give us when using our site is safe and secure. In this Privacy Policy we explain how we use your information.

We will also tell you how and why we collect your personal info, your rights and choices when it comes to these details, as well as the steps we take to keep your information secure and confidential.

Our contact details

Name: Brain Health Scotland Life Sciences Ltd.

Trading Name: Scottish Brain Sciences

Contact: Kim Montano

Registered Office: 3 Redheughs Rigg, Gyleview House, Edinburgh, EH12 9DQ

Phone Number: 0131 353 0233

Website: <http://www.brainsciences.scot/>

E-mail: info@brainsciences.scot

The type of personal information we collect

Scottish Brain Sciences collects and process the following information to allow us to contact you for research and comment:

- Personal identifiers:
 - Name
 - Job Title
 - Employing Organisation
 - Email address associated with your employment
 - Phone Number
- Information you have supplied to us that we have retained:
 - Emails you have sent to us
 - Written documents containing the information you have shared with us such as our:
- Monitoring reports
- Research reports
- News and comment articles
- We have two primary sources of the information we collect:
 - Public websites and publicly available documents
 - Information supplied to us by the named individuals

Our processing purposes

Most of the personal information we process is provided to us directly by you for one of the following reasons:

1. When you apply to participate in our research studies

What we need and why we need it

We collect your personal information directly from you, such as when you register with us on our website, telephone, or in person at roadshows, fairs, and other group events. We may also receive your personal information via a referral from your GP, or from a family member, or carer, who is supporting you.

We use your personal information for our legitimate interests in the following ways:

- To add your personal information as volunteered by you to our database and use it in accordance with your preferences to identify and notify you of clinical trials for which you may be suitable and in which you may wish to participate. This is to establish suitability for current studies and with your authorisation, to review your information in the event that future studies arise for which you may be suitable.
- To administer registration records (including reminder letters, paying your travel expenses)
- To provide details to you on information that may be of benefit to you.
- To notify you about any changes to our service. This is to keep you informed of changes that may affect our business and the services that we provide.
- To investigate complaints and queries in order to investigate and address such information provided to us in order to progress matters raised and to improve our service.
- To monitor / record telephone conversations to or from you in order to ensure best quality, adherence to our policies, to improve our service standards, resolve complaints and for staff training purposes.
- To protect the rights, property and/or safety of Scottish Brain Sciences, its personnel and others associated with the organisation.

If you are enrolled to participate in a particular study, the study sponsor will be the data controller of your personal data for the duration of that trial. We will be processing your personal data on behalf of the sponsor, under a contract with them. For further information you should read the trial sponsor's own privacy notice.

If you are enrolled to participate in a study which involves procedures which take place outside of our organisation, this may include but is not limited to MRI scans and PET scans, the organisation performing the scan may hold your data within their systems for the purposes of the scan. The data they

hold will be held in accordance with their local GDPR policies and procedures. For more information, please ask a member of the study team.

2. When you make a general enquiry

Purpose and legal basis for processing

When you contact us to make a general enquiry about us or our work, or to request information from us, we collect information, including your personal data, so that we can respond to it in the most appropriate way.

The legal basis we rely on to process the personal data you give us in this case is Article 6(1)(f) of the GDPR which allows us to process your personal data where it is in our legitimate interests to do so. We always balance our legitimate interests with your interests as the owner of your own information.

What we need and why we need it

We need enough information from you to answer your enquiry.

This will usually include your contact details. If you contact us by post, email or through our website, we will need some contact details from you in order to respond to you. If you telephone us, our telephone system will tell us the number you are calling from if that number is available to the system, but we will not record that number. If you telephone us and we cannot respond immediately to your enquiry, we may need to record some contact details in order to respond to you later. You can choose which contact details to give us and which to ask us to use. We may also, if appropriate, record the name of the organisation you represent. We will record the details of your enquiry in order for us to answer appropriately.

What we do with your information

Unless your enquiry is extremely simple or trivial (such as, for example, a phone call asking us for our address), we will keep a record of your enquiry and your contact details so we can respond to it appropriately and effectively. We may keep a record of our response to you.

Depending on the complexity of your enquiry we may open a case file in which to record the details of your enquiry in one place.

We will keep the information you provide so that, if you contact us again, we have a record of your enquiry and our response.

We may also use it to analyse our own work and how well we carry out our tasks.

What are your rights

You have the rights of access, rectification, erasure, restriction, objection.

How long we keep it

We keep your data for the minimum 10-year period after the last treatment so that it can respond effectively to any questions or complaints that may later be raised by you and/or your representatives.

3. If you are a family member or carer supporting someone attending our clinic for a study

What we need and why we need it

We may receive your name, contact details and relationship to the study participant from your relative/friend, if not directly from you. We will use this information to contact you in relation to your relative/friend's visits to the clinic and for emergency purposes if necessary.

How long we keep it

We have the right to retain your data for the minimum 10-year period after the last treatment participant so that it can respond effectively to any questions or complaints that may later be raised by you. This data will be retained in accordance with patient information.

4. When you subscribe to our marketing

We like to keep people informed about our work, the latest news and our events.

Purpose and legal basis for processing

If you choose to, we will add your name and contact details to our marketing and newsletter list so we can send you information such as that listed above. We will only ever send you such information when we have your consent to do so, and we will send you that information only via the channels (e.g., by email, post, or telephone) that you have told us we can use.

The legal basis we rely on to process the personal data you give us in this case is Article 6(1)(a) of the GDPR which allows us to process your personal data where we have your consent to do so.

What we need and why we need it

To provide you with the information you have requested we need your name and some means of contacting you such as your email address, phone number or postal address. We also need to record your consent to receiving this information and your consent to the channels by which we can contact you.

What we do with it

We store the details you have given us on our marketing list and use it to provide you with the information you have requested. We may also use your information to understand whether you have responded to anything contained in the information we send you. This helps us to improve our communications.

What are your rights?

We rely on your consent to process the personal data you give us to provide this service. This means you have the right to withdraw your consent at any time. If you do that, we will update our records immediately to reflect your wishes. You also have the rights of access, rectification, erasure, restriction, objection and portability.

Your consent

This is deemed to have been given if information about you is available on the website of the organisation that employs you.

You are able to remove your consent at any time. You can do this by contacting participation@brainsciences.scot

How long we keep it

Any marketing emails/ newsletter emails will be retained for a period of 5 years.

If you have consented to be in our database, your data is kept for a period of 10 years or longer depending on whether or not you have been assigned a study.

5. When you apply for a job to work with us

What we need and why we need it

We collect and process personal information on people who apply for a job role with us. Information on how we process your information in these circumstances is available separately and will always be provided in any job role we advertise so it is available before you apply.

How long we keep it

All recruitment information will be retained for a period of 6 months. If you retire and/ or switch jobs, all your employment information including personal information, wages, employment contracts will be retained for a period of 6 years.

6. When you visit our website

What we need and why we need it

When you visit our website, we may place Cookies on your computer. Please see our Cookies Notice below for further information. You have the option to manage whether Cookies are placed on your device or change preferences at any time.

7. When you interact with us on social media

When you interact with us on social media platforms such as LinkedIn, Facebook, and Twitter, we may obtain information about you (for example, when you like or post on our Twitter page). The information we receive will depend on the privacy preferences you have set on those types of platforms.

How long we keep it

We keep any interactions on social media will be retained for a period of 6 years.

Children's Privacy

Our website is not intended or designed to attract individuals under the age of 18. We do not collect personal information from any person whom we know to be underage and therefore require you to confirm in the Contact Us section to confirm that you are over 18 years of age before completing any personal information.

Sharing your data

Third Party Marketing Partners

We will never sell or give away your information to any third parties to allow them to contact you for the purposes of direct marketing. We do use data processors to provide some services to us. Data processors are third parties who provide a service for us, such as our email provider.

We have contracts in place with all our data processors. This means that it is illegal for them to do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisations apart from us. They will hold it securely and retain it for the period we instruct. You can see further information on the data processors we use in the section on processing purposes below.

Our data processors

We use Office 365, provided by Microsoft to provide our email system and some cloud storage services (such as storing letters we send). Our IT Support provider Vector Cloud Ltd manage our Office 365 system and provide IT security for it. They and their subcontractors, Datto Secure, Webroot, and Cybersmart, are under contract to us and fully comply with all data protection legislation. We use Salesforce as our Constituent Management Database. This is where we store your contact details and any case files we have opened on your enquiry.

We use Amazon Web Services and Evidation Health Inc to supply our website. If you contact us via our website these companies will store the information you supply via the forms on our website.

Our Clinical Study Sponsors

If you are participating in a clinical trial, we will transfer statistical information relating to the study to our clinical trial sponsors. Only the statistical information, from which you cannot be individually identified, required for the study statistics and monitoring as per the relevant study protocol will be transferred. In most circumstances this information is transferred via secure electronic databases and software systems.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why. The cookies marked as necessary are essential for our website to function and will be placed on your computer when you first visit our site. All other cookies are optional, and you can choose whether to receive them or not using the cookie settings buttons at the bottom of the screen.

Controlling cookies

Most web browsers allow you to control the cookies that you come across while browsing the web, including allowing you to refuse to accept cookies and to delete cookies. For detailed information on what cookies are and how they are used see here:

www.allaboutcookies.org

The following links will show you how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)

- [Opera](#)
- [Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact Kim Montano, our Communications and Engagement Officer, using the contact information at the beginning of this document.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the contact address above.

Brain Health Scotland Life Sciences Ltd. is registered with the ICO, Reference:

C1291121.

You can complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House Water Lane
Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

Changes to this privacy notice

Any changes we may make to this notice will be posted on our website. Please check back frequently to see any updates or changes to our privacy notice. This notice is effective from September 2023.