



Newmarket Scientific Privacy Policy – May 2019

1. INTRODUCTION

Newmarket Scientific respects your privacy and are committed to protecting your personal information.

This Privacy Policy (“Policy”) describes our policy for the information we collect, use, process, maintain, and disclose from your use of our websites, mobile apps, products, and services (collectively, “Services”). This information includes information that can be associated with a person/or could be used to identify a person (“Personal Data”), as well as information that does not relate to a person or cannot be used to identify a person (“Non-Personal Data”).

The limitations and requirements in this policy on our collection, use, processing, disclosure, transfer, and storage/retention of Personal Data do not apply to Non-Personal Data.

By visiting our websites or using any of our products or services, you agree that your personal information will be handled as described in this policy.

2. PERSONAL DATA WE COLLECT

2.1 Personal Data You Provide Us

In order to sign up to use our Services, there is some Personal Data we obtain that you voluntarily provide to us. This Personal Data may include, but is not limited to, your contact information such as a first and last name, email address, postal address, phone number, an account password, your social media account(s) information, your subscription preferences; other content you may contribute; your payment and billing information; and/or information you include in public forums, messages, comments, searches, or queries through the Services.

We use the information you provide to send you other information or offers we think may be of interest to you, to comply with legal requirements, and for other purposes as described in this Policy.

2.2 Personal Data We Collect Automatically

Some Personal Data we collect automatically as you use our Services. This Personal Data may include, but is not limited to, your internet protocol (“IP”) addresses; your device and browser type; your internet service provider (“ISP”); your operating systems; statistics on your activities through the Services, such as your login frequency or the length of time spent logged in; information about how you came to our Services; advertising metrics and links clicked within the Services; and/or information collected through cookies, web beacons, and other technologies as described below under “7. Cookies, Web Beacons, and Other Technologies”.

2.3 Personal Data We Collect From Third Parties

We may also collect Personal Data about you from publicly available third-party sources such as, though not limited to, official institute or academic organisation websites, journal publications and their associated websites and other commercially and publicly available sources.

2.4 Personal Data From Your Mobile Device

We may provide features that rely on the use of additional information on your mobile device or require access to certain services through your mobile device that will enhance your experience but are not required to use the Services. Granting us access to this information does not mean you are granting us unlimited access to that information or that we will access specific information without your permission. Some Personal Data from your mobile device, such as your mobile device ID, your operation system, your mobile carrier, and your IP address, may be collected automatically when you use our Services. When using our Services through your mobile device, we may request permission to obtain your current location to provide you with location-related services. In the “Settings” function on your phone, you will have the ability to manually permit or preclude us from recording your geolocation information for certain features of the Services.

3. HOW WE USE THE PERSONAL DATA WE COLLECT

3.1 Your Account

We may use the Personal Data that we receive or collect about you for purposes such as to register your account for certain Services we provide, to communicate with you about our Services and for other customer service purposes. We may obtain additional Personal Data about you to keep our records current.

3.2 Our Business Use

We may use the Personal Data that we receive or collect about you for internal business purposes such as helping us improve the content and functionality of our Services, to better understand our users and how they use our Services, to improve the Services we offer, to develop new features or services, to manage your account, to provide you with customer service, to help improve our security and prevent fraud, to comply with all legal obligations and rights, and to generally manage the Services and our business.

3.3 Communications and Marketing

We may use the Personal Data that we receive or collect about you for communications purposes, such as to provide you with information on products we believe are relevant to your work or information you have specifically requested including, but not limited to technical product information. Such communications will be limited and specifically directed to you. At no point will we send you any form of mass email (unless you specifically opt to a newsletter or other communication mechanism). These communications based on your interests will only be personal communications to you alone. We may also send you procedural information regarding changes or updates to our Services. For further information regarding electronic communications, please see “5.3 Opting Out of Electronic Communications” below.

4. HOW WE MAY DISCLOSE AND TRANSFER YOUR PERSONAL DATA

4.1 Not Selling Your Personal Data

We consider your trust in us regarding your Personal Data to be an important part of our relationship with you. Therefore, we will never sell your Personal Data to third parties, including third party advertisers. There are some circumstances, however, where we may disclose, transfer, or share your Personal Data with a third party without notice to you, but this will only be in relation to normal business processes, as described below.

4.2 Business Transfers

There may come a time where we sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution, or similar event, Personal Data may be considered part of the transferred assets. By using our Services, you acknowledge and agree that any successor to Newmarket Scientific (or its assets) will continue to have the right to use your Personal Data in accordance with this Privacy Policy.

4.3 Parent Companies, Subsidiaries, and Affiliates

We may share your Personal Data with our parent companies, subsidiaries, and/or affiliates for purposes according to this Privacy Policy. Any Personal Data shared with our parent companies, subsidiaries, and/or affiliates will be done so in a manner consistent with the Privacy Policy.

4.4 Contractors, Consultants, and Service Providers

We may share your Personal Data with our contractors, consultants, and service providers who process Personal Data on behalf of Newmarket Scientific to perform certain business-related functions and may be located wherever Newmarket Scientific operates. These companies may

include, but are not limited to database service providers, backup and disaster recovery service providers, email service providers, and others. When we engage another company to perform such business-related functions that may require access to Personal Data, these companies will agree to maintain the confidentiality, security, and integrity of such Personal Data in accordance with this Privacy Policy. Access to Personal Data that these companies receive will be limited to only Personal Data needed to successfully complete the business-related function they have been engaged by us for.

4.5 Legal Requirements

We may disclose your Personal Data if such action is necessary to (i) comply with a legal obligation, (ii) protect or defend our rights, interests, or property, or that of third parties, (iii) prevent or investigate possible wrongdoing in connection with our Services, (iv) act in urgent circumstances to protect the safety of users of our Services or the public, or (v) protect against legal liability.

5. HOW WE SECURE YOUR PERSONAL DATA

We take your security seriously and strive to take reasonable steps to protect your information. No data transmission over the internet or information storage technology can be guaranteed to be 100% secure. The following is a summary of the measures we take to protect the Personal Data you provide us and an explanation of ways we implement these measures. We continue to evaluate and implement enhancements in security technology and practices, however we can only take steps to help reduce the risks of unauthorized access. You can also take steps to protect your information and further minimize the likelihood that a security incident may occur.

5.1 Secure Socket Layer

We use Secure Socket Layer (“SSL”) encryption when transmitting certain kinds of information, such as payment information or Personal Data. An icon resembling a padlock is displayed in most browsers’ window or address bar during SSL transactions. For example, any time we ask for a credit card number for payment or for verification purposes, it will be SSL encrypted in its transmission to our third party payment service provider Stripe, Inc.. The information you provide will be stored securely by Stripe, Inc.. Once you choose to store or enter your credit card number in our Services, it will not be displayed back in entirety for any users. Instead of the entire number, you will only see asterisks and either the first four digits or the last four digits of your number.

5.2 Secure Storage

We maintain reasonable physical, electronic, and procedural safeguards to protect personal information about you.

5.3 Employee and Contractor Access to Personal Data

We limit access to personal information about you only to those trained employees who we reasonably believe need to come into contact with that information to provide products and services to you in order to do their jobs.

6. CHOICES YOU HAVE REGARDING YOUR PERSONAL DATA

6.1 Accessing, Updating, Correcting, or Deleting Your Personal Data

You may request access to your Personal Data being stored by us. If your personal information changes, or if you have determined that the Personal Data we collected about you is inaccurate or processed in violation of applicable law, you may also request that your Personal Data be corrected, amended, or deleted. Requests for access to your Personal Data and to have it corrected, amended, or deleted should be sent to privacy@nktscientific.com or to the mailing address listed under “13. Contacting Us”. We will try to meet all requests regarding Personal Data, however, we may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardise

the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

6.2 Limiting the Personal Data You Provide

You can browse our Services without providing any Personal Data (other than data automatically collected to the extent it is considered Personal Data under applicable laws) or by limiting the Personal Data you provide. If you choose not to provide any Personal Data or limit the Personal Data you provide, you may not be able to use certain functionality of the Services.

6.3 Opting Out of Electronic Communications

Newmarket Scientific may send you electronic communications in relation to your interests or your interactions with us. If at any time you would like to stop receiving these communications you may follow the opt-out instructions contained in any such electronic communication.

If you opt-out of receiving emails or promotions from us, we may still send you emails in relation to your account with us, orders you place with us or any Services you have requested or received from us, or for other customer services purposes.

Please be aware that if you have purchased products from us you cannot unsubscribe from update communications relating to our Services unless you deactivate your account. If you wish to close your account, please email privacy@nktscientific.com. Even after you opt-out of all communications, we will retain your Personal Data in accordance with this Privacy Policy, as provided under "6. Retention of Your Personal Data", though we will no longer use it to contact you.

7. RETENTION OF YOUR PERSONAL DATA

We may retain your Personal Data as long as you are registered to use our Services. You may close your account by contacting us by email at privacy@nktscientific.com or by mail at the address listed under "13. Contacting Us". However, please be aware we may retain Personal Data for an additional period as required under applicable laws. After we delete your Personal Data, it may exist on backup or archival media or servers for an additional period of time for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

8. COOKIES, WEB BEACONS, ETC.

Cookies are small pieces of data, stored in text files, that are stored on your computer or other device when websites are loaded in a browser. They are widely used to 'remember' you and your preferences, either for a single visit (through a 'session cookie') or for multiple repeat visits (using a 'persistent cookie'). Web beacons work similarly to cookies, however, instead of a file stored on your computer, web beacons are embedded invisibly on web pages. We use cookies, web beacons, tags, and other similar tracking technologies to track when you visit our websites and mobile applications (collectively, "Cookies"). For further information on our use of cookies please see our cookie policy (https://www.newmarketscientific.com/cookie_policy).

9. TERMS OF USE

Your use of our Services, as well as any dispute over privacy, is subject to this Privacy Policy.

10. EXCLUSIONS

10.1 Personal Data Provided to Others

This Privacy Policy does not apply to any Personal Data that you provide to another user or visitor through the Services or through any other means or information posted by you to any public areas of the services.

11. THIRD PARTY LINKS

This Privacy Policy applies only to the Services we offer. The Services may contain links to other websites not operated or controlled by us (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Services do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

11.1 Aggregated Personal Data

In an ongoing effort to better understand and serve the users of our Services, we often conduct research on our customer demographics, interests, and behaviour based on Personal Data and other information that we have collected. This research may be compiled and analysed on an aggregate basis and this aggregate information does not identify you personally and we therefore consider and treat this data as Non-Personal Data.

12. CHANGES TO THIS PRIVACY POLICY

Newmarket Scientific reserves the right to update or modify this Privacy Policy at any time. If we make changes to this Privacy Policy, we will post the revised Privacy Policy to our website with a changed date at the bottom of this Privacy Policy. All changes are effective immediately. Your continued use of Services following the effectiveness of any changes constitutes acceptance of those changes. If you do not agree with any of the changes to the Privacy Policy, you should cease accessing, browsing, and otherwise using of the Services we provide, and close your account by emailing us at privacy@nktscientific.com.

13. CONTACTING US

We regularly review our practices regarding Personal Data and this Privacy Policy. If you have questions, comments, or concerns about this Privacy Policy, please contact us at:

By email at privacy@nktscientific.com

By mail at.

ATTN: Newmarket Scientific Privacy Team
Newmarket Scientific
9-10 Rosemary House, Lanwades Business Park
Kennett, Newmarket, Suffolk, CB8 7PN, UK

This Policy has been approved and authorised by:

Name:	Rick Bhatt
Position:	Data Protection Officer
Date:	1 st of May 2019
Due for Review by:	1 st of May 2020

Signature:

A handwritten signature in black ink, appearing to be 'R. M. H.', enclosed in a light blue rectangular box.