



## Privacy policy

Accessible at

<https://www.vectura.com/privacy-policy/>

## 1 Introduction

We at Vectura are committed to safeguarding the privacy of your data that we may collect on our websites (the 'Site'), from third parties, or when you otherwise interact with our business. This privacy notice will explain how your personal data is processed by us.

In this privacy notice, the terms 'Vectura', 'our', 'we' and 'us' mean Vectura Group plc and its subsidiaries. Vectura Group plc is the data controller of the personal data covered by this privacy notice.

## 2 What information do we collect via the Site?

We collect information which you provide to us directly and information related to your use of the Site. For example, we use cookies or other online tracking technologies to collect information automatically about your use of the Site (see the 'Cookies' section below for more information). We will also collect information you provide directly to us through the Site. The categories of information we may collect, therefore, include the following:

- Your name, address, email address, job title and other contact details,
- Information related to an enquiry submitted via the Site,
- Records of your correspondence with us, if you have contacted us, and
- Information collected automatically using cookies and other tracking technologies, such as details of the web pages you have visited on our Site and the content that you access.

## 3 What other information do we collect?

In addition to information collected via the Site, Vectura may also collect personal data from you when you attend our events (including webinars), meet with our staff (e.g. when business cards are exchanged) or otherwise request information from us.

We may also collect your information from third parties who provide us with names and business contact information about individuals who we, or they, think may be interested in our business.

### Applying for a job with Vectura

If you are using our Site to apply for a job with Vectura, we will only collect personal data in the recruitment process that is necessary to assess you for the post applied for. In particular, personal data about criminal convictions will only be sought in exceptional circumstances if relevant to the post, and only where permitted by, and in accordance with, local law. Alongside the categories of personal data above, we may collect and process the following:

- Information you provide in the course of your application for a job vacancy, such as details of your skills and a copy of your CV, and
- Information collected by Vectura through the recruitment process, such as data about your performance at assessment centres, interview or in other assessments and information provided by your referees.

Please also note that certain categories of personal data such as that about race, ethnicity, religion, health or criminal convictions are considered 'sensitive personal information' under data protection law. Generally, we try to limit the circumstances where we process sensitive personal information and to ensure we do not collect this information unless it is necessary.

There will, however, be circumstances where we collect and process sensitive personal information as part of the recruitment process. For example, we may collect information about your race, ethnicity or health for the purposes of conducting equal opportunities monitoring. We may also ask you for details of medical conditions in order to make arrangements for you to attend an interview or assessment centre or because we need to be aware of certain medical conditions in order to assess your suitability for a particular role.

## 4 How we use this information?

We collect your information for the following purposes:

- a) To keep you updated via the newsletter that you may have requested by signing up for it,
- b) To provide you with the information that you may have requested by using the Contact us form,
- c) To consider your application for a job role that you may have applied for,
- d) To ensure that the Site is presented to you in an effective manner, and
- e) To provide you with other marketing communications where we think these may be of interest to your business (see section 4 below).

We will only process your personal data where we have a legal basis for doing so, and this will be determined by the purpose for which your personal data is processed. Typically, we process your personal data on one of the following legal bases:

- Because it is necessary to fulfil a request you have made relating to our Site or the services we provide,
- Because you have provided your consent (for example, where you sign up to receive our newsletter),
- To decide whether or not to enter into a contract of employment with you, or
- Because it is in our legitimate interests to do so (and these are not overridden by the impact on your privacy or other rights). Our legitimate interests include the provision of our products and services, efficiently operating our business, and undertaking marketing activities to promote our business.

We respect your privacy and will use your data only for the purposes it was originally collected for and in accordance with the data protection laws. We will ensure that the data you provide is processed appropriately with technical and organisational measures to maintain security.

We will make every reasonable effort to keep your data accurate and up to date and we will retain it only for as long it is necessary for the specific business activity. This period will vary depending on the nature of your interactions with us. Where we no longer have a need to keep your information, we will delete or anonymise it.

## 5 Marketing

We may send marketing communications to our current and prospective customers and so, depending on your marketing preferences, we may use your personal data to send you such messages by email. Some of these messages may be tailored to you, based on the information we hold about you.

If you no longer want to receive marketing communications from us, you can change your preferences at any time by clicking on the 'unsubscribe' link in any email, or contacting us using the details listed below.

Please note that where you unsubscribe or opt out from a marketing communication, we need to keep a record of your email address to ensure we do not send you marketing emails in the future.

## 6 Cookies

We may also obtain information about your general internet usage through the use of 'cookies' or other internet tracking technologies which enable us to make certain parts of the Site easier to use, to improve the functionality of the Site and so we can undertake analysis on the usage of our site and on our users. Please see our Cookies Policy for more information. When you enter the Site, we may also collect information, where available, about your computer such as your IP address, operating system and browser type for system administration purposes. This information is statistical data about our users' browsing patterns and is used to understand how the Site is being used.

## 7 Sharing your information

We generally do not share personal information collected via the Site with third parties. However, personal data may be shared with third parties where one of the following circumstances applies:

- You have consented to us doing so,
- We are under a legal or regulatory obligation to disclose your personal data, or to protect the rights, property or safety of our company, or customers or others,
- Our company, or substantially all of our company's assets, are merged or acquired by a third party, in which case your personal data may form part of the transferred or merged assets,
- To provide anonymous statistical information about users of the Site and related usage information to reputable third parties, or
- We are using a third party service provider to provide services that involve data processing (for example, hosting the Site).