

Medicines Discovery Catapult and We Share Ventures Funding Programme Privacy Notice

1. Scope

This notice (“Notice”) relates to all individuals whose personal data is processed in line with the requirements of the Regulation (EU) of 27 April 2016 (the General Data Protection Regulation), “GDPR”,) the retained version of the GDPR as it applies in the UK from time to time “UK GDPR” and the UK Data Protection Act 2018. For purposes of this Notice, such individuals are called “Data Subjects”. Under the GDPR personal data is defined as:

“any information relating to an identified or identifiable natural person (the ‘Data Subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

2. Who we are

The Medicines Discovery Catapult Services Limited (“MDC”) and We Share Ventures (“We Share”) have embarked on a joint venture, piloting an innovative funding model aimed at opening new funding opportunities for early-stage medicines discovery. MDC and We Share will hold a call for applications for start-ups across Europe with early-stage medicines discovery projects aligned to MDC’s Syndicate portfolio.

- 2.1. MDC and We Share are bound to specific obligations in relation to data protection under the 2021 Letter Agreement, for the duration of the relevant data processing as joint data controllers.
- 2.2. MDC and We Share have entered into a Data Sharing Agreement.
- 2.3. MDC work to high standards when it comes to processing personal data. MDC will comply with applicable legislation, including the GDPR, the UK GDPR and the UK Data Protection Act 2018. You can contact the MDC’s Data Protection Representative via phone, email, and post:
MDC Data Protection Representative
Phone number: 01625 238734
Compliance email address: compliance@md.catapult.org.uk
Postal address:
Medicines Discovery Catapult
Block 35, Mereside,
Alderley Park,
Alderley Edge,
SK10 4ZF
- 2.4. We Share will comply with Dutch GDPR. You can contact the We Share’s Data Protection Representative via phone, email, and post:
We Share Data Protection Representative
Phone number: +31 (0) 70 312 0 312
Compliance email address: team@weshareventures.com
Postal address: We Share Ventures, Anna Van Hannoverstraat 4, SoZa Building H1 & H0, Den Haag 2595 BJ
- 2.5. Please note that for the purpose of maintaining this Notice up to date, the MDC Data Protection Representative is the owner of this document.

3. Responsibilities

- 3.1. The Data Protection Representatives are responsible for ensuring that this Notice is made available to Data Subjects prior to MDC and We Share collecting/processing their personal data.

- 3.2. All employees/staff of MDC and We Share who interact with Data Subjects are responsible for ensuring that this Notice is drawn to the Data Subject's attention and, where applicable, their consent to the processing of their data is secured prior to any processing.
- 3.3. The Data Protection Representatives will ensure that all employees/staff of MDC and We Share will receive adequate training to make them aware of appropriate data processing behaviours, to ensure compliance with the law and with this Notice.

4. What we do with your data

This Notice tells you how we, MDC, will collect and use your personal data for the purpose of assessing and managing funding applications to the MDC and We Share Funding Programme.

- 4.1. In order for us to provide this service we need to collect personal data for correspondence purposes, funding and application assessments and reviews, supporting any related legal processes such as IP or patent support, public relations and other related administration for the programme. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy.
- 4.2. Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.
- 4.3. **Marketing.** In terms of being contacted for marketing purposes other than advising you of updates on calls for applications which you have opted to receive, where we do not already have a legitimate reason to do so MDC would ensure we contact you appropriately for additional consent to do this.
- 4.4. **Processing.** The personal data we will collect from/process on you are:

| Personal data type | Source (where MDC and/or We Share obtained the personal data from if it has not been collected directly from you, the Data Subject. Note: this may include personal data accessed from publicly accessible sources, such as published research, social media, or Companies House) |
|---|--|
| Name (first name, surname), for applicants, co-founders, or key project personnel or staff resources listed or identified in project correspondence | MDC and We Share Funding Programme Application Form email header, signature or footer, industry body or public directory listings, published research, programme-related reports and other documentation, patent databases, university published directories or website listings, institution contact pages, Companies House |
| Home and / or business address of applicants, co-applicants or key project personnel listed or identified in project correspondence | MDC and We Share Funding Programme Application Form, email signature or footer, industry body or public directory listings, published research, patent databases |
| Qualifications, educational training details and status, membership of societies or organisations related to field of work or study, skills, | Syndicate enquiry form, email signature or footer, industry body or public directory listings, |

| | |
|---|---|
| professional expertise, career history, academic records | published research, patent databases, university website |
| Email address | MDC and We Share Funding Programme Application Form, direct email correspondence, social media or industry body directory listings, published research |
| Contact details (personal or business landline or mobile phone number or email addresses) for representatives/employees of applicants | MDC and We Share Funding Programme Application Form, direct email correspondence, social media or industry body directory listings, published research, programme-related reports and other documentation, patent databases, university published directories or website listings, institution contact pages, Companies House |

4.5 Types of processing and lawful bases

The personal data we collect will be used for the following purposes:

- to fulfill our obligations around assessing application and engaging We Share in the application review, in accordance with the programme function and our relevant terms and conditions;
- to communicate with all relevant parties involved within a funded project under the wider programme in all available formats;
- to fulfill legal, financial, tax and regulatory reporting and record keeping requirements and obligations that apply to MDC and We Share.

Our legal basis for processing for processing some or all of the personal data is:

- **Contract:** processing is necessary for the performance of a contract to which the data subject(s) will be party, or in order to take steps at the request of the data subject prior to entering into a contract;
- **Legitimate Interests:** processing may be necessary for the purpose of the legitimate interests pursued by MDC or the MDC and We Share Funding Programme for the programme, or by a relevant third party, and with the assurance that such interests will not override the fundamental rights and freedoms of the data subject(s) concerned;
- **Public Interests:** where applicable processing could be necessary for the performance of a task carried out in the public interest, or in order to exercise official authority vested in a data controller;
- **Legal Obligation:** when processing is necessary for compliance with a legal obligation to which MDC or the MDC and We Share Funding Programme are subject;
- **Consent:** where applicable, and in the instance that no other lawful basis for processing exists, MDC will communicate clearly to you when this is the case, including how and why the information will be used. We will ensure appropriate, fully informed and unambiguous affirmative consent is sought and recorded from data subject(s). Data subjects may withdraw their consent at any time by contacting the contact details in section 2.4.

4.6. MDC do not envisage processing special category data in any non-anonymised or non-aggregated manner that could identify data subjects, but in the instance where any processing of special category personal data is necessary, processing will be proportionate to the aim pursued, and carried out with all appropriately suitable technical and organisational measures and safeguards to respect the fundamental rights and interests of the data subject(s).

5. Data sharing and disclosure

- 5.1. We will share the details of your application with external reviewers for the purpose of application review; your company name will be shared however no personal data will be shared. External reviewers will be provided with guidance regarding confidentiality, data protection and conflict of interest.
- 5.2. We will pass your personal data on to We Share in the course of dealing with you for your funding application. You should view We Share's privacy policy to understand how they will process your personal data: <https://www.weshareventures.com/privacy-policy/>
- 5.3. We Share are obliged to keep your details securely, and to use them only to fulfil the outlined programme purpose, in accordance with the relevant data sharing agreements put in place, or to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with either the procedure we have set out for them or their own retention schedules, per their listed privacy notice/policy.
- 5.4. Applicants acknowledge that We Share are based or have affiliates outside of the UK and EU/EEA. Personal data shall not be transferred outside of the UK and EU/EEA or into another country which does not offer an adequate level of protection, unless such transfer is carried out in accordance with the requirements under the applicable data privacy legislation.
- 5.5. Unless otherwise provided for by the applicable data privacy legislation, the legal basis for transfer of personal data to a country outside of the UK and EU/EEA shall be based on the EU Standard Contractual Clauses or another appropriate safeguard considered adequate under the applicable data privacy legislation.
- 5.6. All applications must be submitted via MDC and We Share Funding Programme Application Portal. The portal is hosted by Submittable on behalf of MDC and will ensure compliance with the relevant regulations on data protection.

6. Retention period

- 6.1. MDC will process personal data for as long as required for the purpose of our role and function within the MDC and We Share Funding Programme.
- 6.2. We are required to retain some personal information in accordance with the law, such as information needed for tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data will be held in addition to these periods depending on individual business needs.
- 6.3. Should you wish a copy of our 'Retention Schedule', please use the contact details in section 2.3 of this Privacy Notice. For the retention policies and schedules of We Share, you should review their own individual privacy notices to understand how they will retain and delete your personal data.

7. Your rights as a Data Subject

- 7.1. At any point while we are in possession of, or processing, your personal data, you (the data subject) have the following rights:
 - **Right of access** – you have the right to request a copy of the information that we hold about you.
 - **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.

- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – in some circumstances you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** – in the event that MDC refuses your request under ‘right of access’, we will provide you with a reason why we have refused some or all of your request. You have the right to complain as outlined in clause 3.6 below.

7.2 Any or all of the above requests that we receive will be forwarded on to We Share, if they are involved (as stated in 3.5 above) in the processing of your personal data.

8. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by MDC and We Share, or how a complaint you have made to us in relation to this processing has been handled, you have the right to lodge a complaint directly with the supervisory authority and where applicable, MDC’s and We Share’s Data Protection Representatives as outlined in 2.5 above.

The details for the relevant supervisory authority are:

Information Commissioner’s Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF
 Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
 Fax: 01625 524 510
 Website: ico.org.uk

9. Subject Access Requests

At your request, MDC can confirm what information we hold about you and how it is processed. MDC treat our responsibilities for data privacy very seriously and will ensure we take all reasonable steps to correctly identify anyone submitting a subject access request to our business, per our Data Subject Access Request Procedure. Should you wish a copy of this Procedure please contact MDC’s Data Protection Representative using the details in section 2.3 above.

10. Change History Record

| Issue | Description of Change | Approval | Date of Issue |
|-------|---|-------------|---------------|
| 1 | Review by external data protection consultant | Jessica Lee | 24 Aug 2021 |
| 2 | | | |
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