

PRIVACY POLICY FOR BIOMAGE LIMITED

A Introduction

This privacy policy identifies the basis upon which personal, and other data is processed through the Biomage website (<https://www.biomage.net>) and the community instance of the cloud-based single cell analysis platform, Cellenics®, which is hosted by Biomage (<https://scp.biomage.net/>) (separately and together, “the Site”). This policy expressly does NOT govern instances of Cellenics® hosted by other parties (unless explicitly stated that it does).

The Site is owned and operated by Biomage Limited whose registered office is at Suite 2, Ground Floor Orchard Brae House, 30 Queensferry Road, Edinburgh, United Kingdom, EH4 2HS (“**Biomage**”) Biomage will be a data controller in relation to the performance of any order you place through the website. If you have questions or require more information about our Privacy Policy, please contact us: hello@biomage.net

At Biomage, we take user privacy seriously and are committed to GDPR compliance. When we say “seriously” we mean it -- our CEO took active part in drafting and subsequent reviews of this document. This document describes the types of information that is collected and recorded by Biomage and how we use it. Biomage reserves the right to make changes to this policy at any time by notifying users on this page and through the Site. If in doubt, you can always check when the most recent update of the Privacy Policy took place by referring to the date of the last update listed at the bottom of this page.

B Consent to this Policy

By using the Site, you hereby consent to the terms of this policy.

SECTION I. PROVISION OF PERSONAL INFORMATION VIA BIOMAGE WEBSITE AND/OR BIOMAGE-HOSTED INSTANCE OF CELLENICS®

1. Types of Personal information we collect; How we collect it

We collect the following categories of personal information/data in the following ways:

- A The personal information that you provide to us including: your full name, email address, Institution or Company. If you contact us directly, we may receive additional information about you such as your phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide.
- B We automatically collect certain information when you visit or navigate through the Site. This information includes device and usage information, such as your IP address, browser and device characteristics, operating system, location, information about how and when you use the sites and other technical information. This information is needed to maintain the security and operation of our sites as well as our internal analytics and reporting purposes. Please refer to the Cookies section below for further details.

You are responsible for any third-party personal data obtained, published or shared through the Site and confirm that you have such third party's consent to provide any such data to Biomage.

2. How we use your personal information (purpose); Lawful basis

We process personal data on the basis that all users have given their specific consent for us to do so. In giving this consent, you agree that we may use the relevant data:

- to communicate with you, including for customer service and support;
- to provide you with updates and other information relating to our website and products; and
- for marketing and promotional purposes. For example, we may disclose the fact that you are a user to other labs at your institution or potential users at other institutions.

We will not sell or share your details to third parties other as expressly referenced below or elsewhere in this policy. Specific instances where we may share details are:

- in the context of any corporate transaction involving Biomage, including any merger, sale, third party investment or financing where such disclosure may reasonably be required. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice;
- by signing up for an account on the Biomage-hosted instance of Cellenics®, you agree to the processing and storing of your information by Amazon Web Services Cognito service. AWS does not access or use the data that you have provided. For more information, please refer to [AWS data Privacy FAQ](#);
- we use a Customer Relationship Management system, Airtable, to collate and store your personal information. Airtable does not access or use the data you have provided. For more details, please refer to [Airtable security information](#).

3. International transfers

In order to share with Amazon Web Services Cognito and Airtable, we will transfer your personal data outside the EEA to the USA. We have considered the privacy implications of such a transfer and will ensure protection for your Data through your explicit consent to this policy. We will also as appropriate enter into standard contractual clauses pursuant to applicable law as approved by the UK ICO and/or European Commission.

4. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will notify you and any applicable regulator of a breach where we are legally required to do so.

5. Data retention

Biomage will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

SECTION II. PROVISION OF SCIENTIFIC DATA VIA THE BIOMAGE-HOSTED INSTANCE OF CELLENICS®

1. Scientific data we collect

Scientific data that you provide to us is collected via upload to the Biomage-hosted instance of Cellenics®. These scientific data may constitute raw or pre-processed data files from single cell RNA sequencing experiments together with associated metadata.

If the data you provide to the Biomage-hosted instance of Cellenics® are from human donors, it is your responsibility to ensure that the data are anonymised and that they cannot be traced back to the donor(s). Biomage accepts no responsibility for the disclosure of sensitive patient information through the upload of data and metadata to the Biomage-hosted instance of Cellenics®. Practically speaking, primary data files (in the form of count matrices) are unlikely to be traceable to specific individuals (although you should take care in the rare instances where it might, e.g. rare diseases), but users of the the Biomage-hosted instance of Cellenics® should take extreme care not to disclose patient information through metadata fields.

2. How we use your scientific data

By uploading scientific data to the Biomage-hosted instance of Cellenics®, you are giving permission for members of the Biomage team to access your data files and associated metadata. Biomage will only use this data for Cellenics® development, Cellenics® debugging purposes, and improvement of our proprietary processes, algorithms and machine learning models. Improving machine learning models includes fitting parameters of the machine learning models. Biomage reserve the right to monetize any proprietary processes, algorithms and machine learning models.

Your scientific data will never be shared with other users of the Biomage-hosted instance of Cellenics® or with third parties, unless with your specific permission.

You may grant access to your project(s) including the data and metadata therein to other users of the Biomage-hosted instance of Cellenics®. The sharing of your scientific data by this route is your responsibility and Biomage does not accept responsibility for any change, loss or inadvertent disclosure of your scientific data in these circumstances.

3. How we store your scientific data

When you upload your single cell dataset(s) to the Biomage-hosted instance of Cellenics®, the data is securely stored in the Amazon S3 storage service provided by Amazon Web Services. Access to the data is controlled exclusively by Biomage - third parties, including Amazon, cannot access your data. See [AWS Data Privacy FAQ](#) for more information.

4. Deletion of your scientific data

You can delete your scientific data from the Biomage-hosted instance of Cellenics® any time by deleting the project from the Data Management module. Note that deleting a project deletes all data, metadata, analyses, and all other information under this project from Amazon S3. This action cannot be undone.

SECTION III. COOKIES AND LOG FILES ON BIOMAGE WEBSITE AND THE BIOMAGE-HOSTED INSTANCE OF CELLENICS®

1. Cookies

Our website is hosted by Squarespace. Our website uses some necessary cookies to enable visitors to navigate and use key features on our site. Details of these essential cookies are available on the [Squarespace page](#).

The Biomage-hosted instance of Cellenics® uses AWS Cognito for authentication. Upon successful login, Cognito returns a base64-encoded JSON Web Token which is stored in secure cookies. This cookie allows you to access and navigate the Biomage-hosted instance of Cellenics® across browser sessions. The information contained in the cookie includes:

Key	Description
sub	Cognito user ID
email_verified	User email verification status
iss	Issuer of the JSON Web Token
event_id	Login event id
token_use	Use of the token (for access or id)
auth_time	Authorization time
name	User's full name
exp	JSON Web Token expiration time
iat	JSON Web Token issue time
email	User's email address

2. Log Files

Like most other services, we use log files. These files log visitors when they visit websites. All hosting companies do this as part of hosting services' analytics.

The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and the number of clicks. These metrics are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

We use these log files to:

1. Provide, operate, and maintain our website and/or the Biomage-hosted instance of Cellenics®
2. Improve, personalize, and expand our website and/or the Biomage-hosted instance of Cellenics®

3. Understand and analyze how you use our website and/or the Biomage-hosted instance of Cellenics®
4. Develop new products, services, features, and functionality

3. User Analytics

We use Matomo Analytics to track user activity on the Biomage-hosted instance of Cellenics®. Matomo processes user data such as device and usage information, including your IP address, browser and device characteristics, operating system, location, information about how and when you use the Biomage-hosted instance of Cellenics® and other technical information. We also use additional features of Matomo including session recording and click events (movements, content forms and clicks).

The personal information received through Matomo is only sent to Biomage.

We use Matomo to track user activity to:

1. Support you with your analysis
2. Understand and analyze how you use the Biomage-hosted instance of Cellenics®
3. Identify technical issues with the Biomage-hosted instance of Cellenics®
4. Optimize Cellenics® features and functionality

SECTION IV. DATA PROTECTION RIGHTS

1. We would like to make sure you are fully aware of all of your data protection rights. Under privacy regulations you have certain rights in relation to your personal data to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or

defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

2. Under the CCPA (California Consumer Privacy Act), among other rights, consumers residing in California have the right to:

- Request that a business that collects a consumer's personal data disclose the categories and specific pieces of personal data that a business has collected about consumers.
- Request that a business delete any personal data about the consumer that a business has collected.
- Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

3. If you make any such requests, we have one month to respond to you. If you would like to exercise any of these rights, please contact us by sending an email to hello@biomage.net.

4. You also have the right to make a complaint at any time to the UK ICO, the supervisory authority for data protection issues www.ico.org.uk, although we would of course welcome the opportunity to deal with any issues first. Please contact us with any concerns at hello@biomage.net

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