

## UMI<sup>3</sup> Website Visitor Privacy Policy

For the purposes of this policy, any reference to "We/Us/Our" means The University of Manchester I<sup>3</sup> Limited ("UMI<sup>3</sup>"), registered in England and Wales with the registered number: 05177409. Our registered office is at the Core Technology Facility, 46 Grafton Street, Manchester, M13 9NT.

### UMI<sup>3</sup> Website Visitor Privacy Policy - What you need to know.

This is the UMI<sup>3</sup> privacy policy to explain how and why We use your personal data as a visitor to Our website. Our website and apps are not intended for use by children who are under 16 years of age.

### Our Data Protection Responsibilities.

We recognise the importance of protecting the privacy of information.

"Personal data" is any information that relates to an identifiable natural person. Your name, address and contact details are all examples of your personal data, if they identify you.

UMI<sup>3</sup> is a "controller" of your personal data, meaning We make decisions about how and why We use your personal data and, because of this, We are responsible for ensuring it is used in accordance with data protection laws, including the General Data Protection Regulation EU 2016/679 ("GDPR") and the Data Protection Act 2018.

### Privacy Policy Summary

1. What personal data We collect about you and where We get it from (including cookies).
2. Why We use your personal data.
3. Who We share your personal data with and why.
4. Where We send your personal data outside Europe.
5. How We keep your personal data secure.
6. How long We keep your personal data and why.
7. Your rights and how to use them.
8. Further information.

#### 1. What personal data We collect about you and where We get it from (including cookies).

We collect your personal data from you when you contact Us using Our website. We may collect the following categories of personal data:

Category of personal data	Examples of your personal data
Contact information	Name, Address, Email Address, Telephone Number, the name of your organisation.
Query information	Details of any of requests for information or online queries which you make through Our website.
Preferences	Your marketing preferences, your account settings including any default preferences, whether you would like Us to share your personal data with Our Affiliates and companies we set up such as staff or student start-up companies based on Our IP (collectively referred to as

	“Our Spin-Off Companies”), any preferences We have observed, such as the areas of Our website that you visit.
Observed information	<p>Details of your online browsing activities on Our website, such as the pages, or areas of Our website that you visit, or which link has brought you to Our website from Our email communications or third-party websites.</p> <p>This information may be identifiable to you because you are logged in to your account, or because We have collected details of your IP address or the device that you have used to access the website. This may also give Us the geographic region which your device reports that you are located in.</p>
Communications	Communications We may have with you, whether relating to a query or not.

You can, should you choose, disable the cookies from your browser and delete all cookies currently stored on your computer. On Microsoft Internet Explorer, this can be done by selecting "Tools/Internet Options" and reviewing your privacy settings or selecting "delete cookies". You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting <http://www.allaboutcookies.org/manage-cookies/index.html>. This may prevent you from taking full advantage of the website.

No information obtained from cookies will be used by Us for marketing purposes.

## 2. Why We use your personal data.

We collect and use information about you or your devices for particular purposes in the course of responding to your queries. The GDPR sets out specific “lawful bases” for processing personal data. The basis on which We process different information about you and the purpose of that processing are explained below.

Lawful basis and purpose	What personal data do we use
<p><b>Consent:</b> To send you direct marketing in accordance with the preferences you select when you sign up to receive marketing, request information or submit a query.</p> <p>To collect certain personal data about you via cookies or other similar technologies.</p>	<p>Contact information, Preference information, Query information.</p> <p>Observed information.</p>
<p><b>Performance of Our contract with you:</b> To process and respond to your queries, to send you information which you have requested about information relating to: Our company; Our affiliates; and/or the Spin-Off Companies including products and services which they offer in the commercialisation of their intellectual property rights (“Commercial Opportunities”).</p>	<p>Query information, Communications, Contact information.</p>
<p><b>Our legitimate interests:</b> For Our internal business administration, including keeping general records of queries and requests for information. This is necessary in order for Us to operate efficiently, deal with any issues which may arise and to protect Ourselves</p>	<p>Query information, Communications, Preference information.</p>

against any future legal claims.

Where you have requested Us to do so, to send you information which you have requested about information relating to Our company and Our affiliates and/or the Spin-Off Companies including Commercial Opportunities they offer. This is necessary to ensure that We are providing you with relevant details about Our and Our affiliates' and Spin-Off Companies' Commercial Opportunities where these are of interest to you. They will only ever be sent in line with your stated preferences and interests.

To target Our direct marketing to you (where you have consented to receive it): This means that We use the information you provide Us with and that We observe from your interactions with Us to build a better picture of the type of Commercial Opportunities which you might be interested in, so that the communications you receive are more relevant to you. We believe this is justified as you are in control over whether you receive Our direct marketing, through your initial preferences and each time We contact you.

To improve Our marketing activity more generally: This means We use information about you and about other users of Our website to improve Our marketing activity, to develop Our websites to be more relevant to visitors of Our website generally and to improve your online experience. We may collect your geographical location and the time that you have spent on the website. Where possible, We will use statistical or pseudonymised data for these purposes.

Contact information,  
Preference information,  
Communications, Contact  
information.

Communications,  
Preference information,  
Observed information

Query information,  
Preference information,  
Communications, Observed  
information

### 3. **Who We share your personal data with and why.**

We may need to share your personal data with Our affiliates and Our Spin-Off Companies for the purposes set out above. We only share the personal data they need to know for the purposes and access rights between members of Our affiliates and Our Spin-Off Companies are limited and granted only on a need to know basis.

We may ask external contractors to carry out certain business functions for Us, such as our IT support. We may need to share your personal data with such external contractors so that they can perform these functions.

Before We disclose your personal data to any of Our affiliates or Our Spin-Off Companies, or to any external contractor, We will make sure that they have appropriate security standards in place to ensure your privacy is protected and We will enter into a written contract imposing appropriate security standards on them.

We have set out below a list of the categories of recipients with whom We are likely to share your personal data:

- consultants and professional advisors including legal advisors and accountants;
- business partners and joint ventures;

- insurers;
- providers of IT support;

If We decide to reorganise or sell all or most of Our business, We may disclose your personal data to the buyer of the business.

#### 4. **Where We send your personal data outside Europe.**

Your personal data may be stored, or used, in a location outside Europe in the United States of America. We only send your details outside of Europe when We can meet Our legal obligations to keep your details safe, for instance if the country to which the transfer is to be made ensures adequate protection for personal data.

#### 5. **How do We keep your personal data secure.**

We are committed to ensuring your personal data is secure. Once We receive your personal data, We will put in place suitable physical, electronic and managerial procedures to safeguard your personal data against unlawful or unauthorised use by a third party and accidental loss, destruction or damage.

#### 6. **How long We keep your personal data and why.**

We will only keep your personal data whilst We are dealing with your query, sending you information you have requested or contacting you for marketing purposes, and then for a limited period of time afterwards. This will depend on factors including any laws or regulations that We are required to follow and whether We are in a legal or other type of dispute with each other or any third party.

#### 7. **Your rights and how to use them.**

You have certain legal rights to find out about how and why We use your personal data and to control its use. These include the following:

<b>Your right</b>	<b>What does it mean?</b>
<b>Right of access</b>	You are entitled to have access to your personal data and specific personal data about its use by Us (this is more commonly known as submitting a “data subject access request”). If possible, you should specify the type of personal data you would like to see.
<b>Rights in relation to inaccurate personal or incomplete data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or add details to make it complete. Please notify Us of changes to your personal data as soon as they occur, including changes to your contact details.
<b>Right to object to or restrict Our data processing</b>	You have the right to object to or ask Us to restrict the processing of your personal data. Where Our use of your personal data is needed based on legitimate interests and you want Us to object to processing on this ground. You always have the right to ask Us to stop any direct marketing to you.
<b>Right to erasure</b>	You are entitled to have your personal data deleted or destroyed (also known as the “ <i>right to be forgotten</i> ”), such as where your

Your right	What does it mean?
	personal data is no longer needed for its intended use. We may not always be able to erase your personal data completely, such as where We still need it to deal with legal claims.
<b>Right to withdrawal of consent</b>	Where Our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Please note that this will only affect future use of that personal data.
<b>Right to data portability</b>	You are entitled to receive the personal data which you have provided to Us and which is used by Us based on your consent, in an electronic, commonly used format.

If you would like to exercise one of these rights, please contact Our Data Protection Officer by emailing [dataprotection@manchester.ac.uk](mailto:dataprotection@manchester.ac.uk).

You also have a right to complaint to the UK's privacy regulator, the Information Commissioner's Office. More information can be found on the Information Commissioner's Office's website at <https://ico.org.uk/>.

#### 8. Further information.

We have appointed a Data Protection Officer whose role is to inform and advise Us about, and to ensure that We remain compliant with, data protection laws. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data. Our current Data Protection Officer is Alex Davybank who can be contacted at [dataprotection@manchester.ac.uk](mailto:dataprotection@manchester.ac.uk)

If you would like to request further information about any of the subjects covered in this privacy policy or if you would like to discuss any issues or concerns with Us, you can also contact Us in the following ways:

By post at: University of Manchester I<sup>3</sup> Limited, Core Technology Facility, 46 Grafton Street, Manchester, M13 9NT.

By email at: [info@umip.com](mailto:info@umip.com)

By phone at: 0161 603 7751.

We will sometimes update this policy but will only send a copy to you if We make a significant change affecting your privacy, so please do check back here for other changes.

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