



# PRIVACY POLICY & DATA SUBJECT RIGHTS

## Introduction

Aspire Scientific is committed to being transparent about how it collects and uses your personal data, and to meeting its data protection obligations. This Privacy Policy explains what personal data the Company will collect, what we will do with it and why, and how long we will keep the data. This policy is relevant for employees, contractors, suppliers, clients, authors, and recruitment candidates.

## Identity and contact details

Aspire Scientific Limited's registered and postal address is Fourth Floor, Unit 5b, The Parklands, Bolton, BL6 4SD. You can contact us about any data protection issues relating to Aspire Scientific by emailing [philippa.flemming@aspire-scientific.com](mailto:philippa.flemming@aspire-scientific.com).

We are registered at Companies House as Aspire Scientific Limited (company number: 07876476).

Our designated supervisory authority under the UK Data Protection Act 2018 is the Information Commissioner's Office (ICO).

The individual in charge of Data Protection in our company can be contacted at [philippa.flemming@aspire-scientific.com](mailto:philippa.flemming@aspire-scientific.com).

## What data we collect

We collect different types of information for the different categories of data that we process.

For our staff (contractors and employees), we collect:

- Name, address and contact details, which can include email address and telephone number, date of birth and gender.
- Qualifications and employment history, including start and end dates, with previous employers and with the Company;
- References from past employers, or from other relevant individuals;
- Information about any criminal record;
- Financial details;
- Personnel documentation;
- Information about medical or health conditions.

We may collect data for other categories of individuals, including clients, authors that we work with, recruitment candidates, and suppliers. This may include (but is not limited to) name, address, contact details (including email address, telephone number, and affiliation details), date of birth and gender.

We collect data on our clients and staff so that we can enter into and fulfil our contractual obligations and use the lawful reason of Contract to process this data. We can capture special category information on our staff (for example information on medical or health conditions), and we process this special category data as it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security, or social protection.

We are required to process some data on staff in specific ways by law; for example passing on information about the amount of tax that staff have paid in salaries, or retaining information on staff for a certain amount of time after the contract with the staff member has ended. Where we process data in this way, we use the lawful basis of Legal Obligation to process the data.

We process information on the authors whose materials we are working on as a part of our business so that they can be attributed with the authorship of the works. Where we work directly with the intended publishers of the materials, we transfer this data to the publishers. We use a lawful reason of Legitimate Interest to process this data. We have completed the specification, gate analysis and balancing tests specified under GDPR for this data. We do not capture special category information on this data.

We process data on our staff so that we can improve business administration, for example by setting up email addresses for staff to use or running recruitment promotions. We use a lawful reason of Legitimate Interest to process this data. We have completed the specification, gate analysis and balancing tests specified under GDPR for this data. We do not capture special category information on this data.

We process information on our prospective clients so that we can enter into sales and marketing communications with them. We use a lawful reason of Legitimate Interest to process this data. We have completed the specification, gate analysis and balancing tests specified under GDPR for this data. We do not capture special category information on this data.

We process information on recruitment candidates so that we can enter into discussions with them regarding potential employment. We use a lawful reason of Legitimate Interest to process this data. We have completed the specification, gate analysis and balancing tests specified under GDPR for this data. We can capture special category information on candidates (for example information on medical or health conditions), and we process this special category data as it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment.

## Other information on what we do with data

We pass data on to other data controllers for the following purposes:

- For data relating to those applying to be members of staff or for staff who have found other employment after the end of a contract, we share data with third parties to obtain and provide references.
- As the data controller of data, we may provide access to data processors that process data on our behalf, who will only process the data according to the written instructions in the Data Processing Agreements in place with them.
- We share data on staff with organisations where we are acting as an intermediary between the staff and an organisation providing benefits to the staff member (for example pension providers).
- We transfer contact details and other data relating to authors of the papers and other material that we work on to publishers.
- We transfer contact details and other data relating to authors of presentations, posters or slide decks on to congress organisers.
- With their express permission, we transfer data relating to our suppliers to our clients upon request.

## International transfer of data

In some instances, the publishers of the materials that we work on reside in countries outside of the EEA and the UK where no adequacy decision has been made. In these cases, and where Aspire Scientific is responsible for submitting the materials for publication, we gain written permission to submit the materials to the publisher from each data subject (author) prior to making the transfer.

We use Dropbox, Microsoft 365, and Share Point / Teams as file hosting services. The data on the Dropbox servers, and the backup of the data, is based in the United States of America. Dropbox have signed Standard Contractual Clauses, and as such the transfer of data to Dropbox is covered by an adequacy decision by the EU.

Otherwise, we will not transfer data to countries outside the UK without permission.

## Representative within the EU

We process data on individuals who reside within the EEA. As such, we have considered the obligation to appoint a representative within the EU. We have reviewed the EU data that we process and believe that our processing is both occasional and also unlikely to result in a risk to an individual's data protection rights and freedoms. As such, we have not appointed a representative directly within the EU.

## Deletion of data

- Data relating to clients will be deleted 10 years after the end of the most recent contract involving the customer.
- Data relating to unsuccessful applicants to be an employee will be removed 18 months after the application.
- Data relating to unsuccessful applicants to be a contractor or freelancer will be removed 6 years after the application, in case work becomes available for that individual.

- We will delete data relating to staff members 5 years after their contract is terminated.
- Personal data relating to prospective clients will be deleted 5 years after the end of the most recent communication with the prospect.

In many instances, these data retention timescales are overridden by other legal obligations. For example, limited companies are required to retain records on tax paid for 6 years.

All records are disposed of securely when deleted.

## How we look after data

We take reasonable technical and procedural precautions to prevent the loss, misuse, or unauthorised alteration of personal data.

We store the personal data that we collect securely.

We do not publish the details of the safeguards we use to protect the personal data that we control as this could reduce the effectiveness of those safeguards.

## Data you need to provide

Before we can agree a contract with staff, the Company must have some data, for example contact details, evidence of the right to work in the UK, and bank details. We may also need data so that we can support your statutory rights, such as in relation to statutory leave entitlements or the rights outlined in this document. Failing to provide the data may mean that we are unable to support you in exercising your statutory rights.

Certain information, such as contact details, your right to work in the UK, and bank details need to be provided to enable the Company to enter into a contract of employment with you. For example, bank details are required to process your pay, and proof of right to work in the UK is required before we can offer you employment.

## Your rights

Aspire Scientific Limited recognises the rights of data subjects as defined in the Data Protection Act 2018.

We will always seek to uphold those rights, where relevant. These rights include:

- Your right to be informed (this document and further information in communications we might send to you).
- Your right of access.
- Your right to rectification.
- Your right of erasure (right to be forgotten).
- Your right of restriction of processing.
- Your right to data portability.

- Your right to object to our processing of your information.
- Your rights in relation to automated decision-making and profiling.

Please note that we do not use automated decision-making or profiling tools.

Please contact us using the contact details at the beginning of the document to exercise any of your rights. We will respond to your communication within 30 days of receiving it.

Aspire Scientific Limited recognises your right to lodge a complaint with a supervisory authority. You can contact the ICO using the details below:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate)

## **Review and maintenance**

This policy was last updated in July 2025 and is scheduled to be reviewed in July 2026.