

Website Privacy Policy (DRAFT 24 April 2026)

Last updated: 18 April 2026

Effective date: 18 April 2026

This Website Privacy Policy explains how **Cumulus Neuroscience Limited** (company number NI628481, registered office Concourse 3, Unit 5, Queens Road, Belfast, BT3 9DT) (“we”, “us”, “our”) collects, uses, discloses, and protects personal data when you visit or interact with our website.

This policy applies to:

- Visitors to our website;
- Individuals who contact us via website forms, email links, or other online channels;
- Subscribers to our newsletters, event invitations, and marketing communications; and
- Professional contacts whose details we source from third-party business data providers for the purposes of B2B outreach (see Section 3).

This policy does **not** cover personal data processed in the context of clinical trials, clinical studies, or research sponsored by or conducted with our pharmaceutical or biotechnology customers. Separate participant-facing privacy notices and informed consent documents apply to those activities.

It should be read together with our [Cookie Policy \[insert hyperlink\]](#), which provides detailed information about the cookies and similar technologies we use on our website.

1. Who we are and how to contact us

Controller: Cumulus Neuroscience Limited

Company number: NI628481 (registered in Northern Ireland)

Registered office: Concourse 3, Unit 5, Queens Road, Belfast, BT3 9DT, United Kingdom

Data Protection Officer

Email: dpo@cumulusneuro.com

Postal: Data Protection Officer, Cumulus Neuroscience Limited, Concourse 3, Unit 5, Queens Road, Belfast, BT3 9DT, United Kingdom

EU Representative (Article 27 GDPR)

For the purposes of the EU General Data Protection Regulation, our EU representative is our group entity established in the Republic of Ireland. You can reach them via our address in Northern Ireland.

EU data subjects may contact our EU representative directly in relation to any matter arising under EU GDPR.

We are the **data controller** for personal data processed via this website. Where we process personal data on behalf of our customers (for example, in the context of clinical trials), we act as a processor and different contractual and notice arrangements apply.

2. What personal data we collect

Depending on how you interact with our website and whether you engage with us through other channels, we may collect the following categories of personal data:

- **Identity and contact data:** name, business email address, organisation, job title, country, telephone number (where provided).
- **Enquiry content:** the content of any message you send us via a form, email link, or other online channel.
- **Marketing and preference data:** your marketing preferences, subscription status, and interactions with our marketing communications (including opens, clicks, and link tracking within emails).

- **Technical data:** IP address, browser type and version, operating system, device identifiers, referring URL, and similar technical information automatically collected when you visit our website.
- **Usage data:** information about how you use our website, such as pages visited, time spent on pages, links clicked, and navigation paths.
- **Cookie data:** information collected via cookies and similar technologies, as further described in our Cookie Policy.

We do **not** intentionally collect special category data (such as health data, racial or ethnic origin, or biometric data for identification) via our website. Please do not submit special category data to us through our website forms.

We do **not** use website data to make decisions about you by purely automated means that produce legal effects concerning you or similarly significantly affect you. In plain terms, decisions about your account, eligibility, or treatment by us are not made by automated systems without human involvement.

3. How we collect personal data

We collect personal data:

- **Directly from you** – when you complete a form, contact us by email, subscribe to marketing communications, register for an event, or otherwise interact with our website.
- **Automatically** – through cookies and similar technologies when you visit our website (see our Cookie Policy).
- **From third-party business data providers** – we may obtain professional contact details (name, business email, organisation, job title, professional profile) from commercial B2B data sources such as LinkedIn Sales Navigator, ZoomInfo, Apollo, and similar providers. We use this information to contact relevant professionals in the pharmaceutical, biotechnology, and clinical research sectors about our clinical neuroscience technology and services.

Where we obtain your contact details from a third-party provider, we will — in accordance with Article 14 UK GDPR / EU GDPR — provide you with information about our processing at or before our first communication with you, and in any event within one month. You have the right to object to our processing for marketing purposes at any time (see Section 9).

4. How we use your personal data and lawful bases

We process personal data only where we have a valid lawful basis under the UK GDPR and EU GDPR. The table below sets out, for each of our main processing activities, the lawful basis we rely on and — where relied on — the specific legitimate interest we pursue.

Processing activity	Lawful basis (UK GDPR / EU GDPR)	Our legitimate interest (where relied on)
Responding to enquiries submitted via website forms or email	Legitimate interests – Article 6(1)(f)	Responding to prospective customers, partners, and other enquirers in the ordinary course of business
Sending marketing communications (newsletters, event invitations, product updates)	Consent – Article 6(1)(a); and Regulation 22 PECR	N/A – consent
Operating, securing, and maintaining the website (including strictly necessary cookies)	Legitimate interests – Article 6(1)(f); Regulation 6(4) PECR for strictly necessary cookies	Ensuring the website is secure, functional, and performs properly
Website analytics and performance measurement (analytics and marketing cookies)	Consent – Article 6(1)(a); Regulation 6(1) PECR	N/A – consent

Processing activity	Lawful basis (UK GDPR / EU GDPR)	Our legitimate interest (where relied on)
B2B outreach to professional contacts sourced from third-party business data providers	Legitimate interests – Article 6(1)(f); Regulation 22 PECR where applicable (corporate subscribers) or consent	Marketing our clinical neuroscience technology and services to relevant professionals in the pharmaceutical, biotechnology, and clinical research sectors
Maintaining records of consent, preferences, and communications	Legal obligation – Article 6(1)(c); Legitimate interests – Article 6(1)(f)	Demonstrating compliance with data protection law (accountability)
Compliance with legal, regulatory, and audit obligations	Legal obligation – Article 6(1)(c)	N/A

Where we rely on legitimate interests, we conduct a legitimate interests assessment (LIA) to balance our interests against your rights and freedoms. You can request further information about any LIA by contacting our Data Protection Officer.

Where we rely on consent (for example, for marketing emails or non-essential cookies), you may withdraw your consent at any time without affecting the lawfulness of processing carried out before withdrawal. You can unsubscribe from marketing emails using the link in any marketing message, or by contacting us at dpo@cumulusneuro.com.

5. Marketing communications

We send marketing communications (such as newsletters, event invitations, and product updates) only to individuals who have given their consent to receive them, in line with UK GDPR, EU GDPR, and PECR.

Our marketing emails may contain tracking pixels and link-tracking technology that record whether you have opened the email and which links you have clicked. We use this information to measure engagement, improve the relevance of our communications, and manage our marketing lists.

You may unsubscribe from marketing communications at any time by:

- Clicking the “unsubscribe” link in any marketing email;
- Updating your preferences via the preference centre link in our emails; or
- Contacting our Data Protection Officer at dpo@cumulusneuro.com.

Unsubscribing will not affect transactional or operational communications (for example, responses to your enquiries or messages about contractual matters).

6. Cookies and analytics

Our website uses cookies and similar technologies to ensure website functionality, analyse traffic, measure performance, and (with your consent) support marketing.

Where required under PECR, we obtain your consent via our cookie banner before placing non-essential cookies. You can manage your cookie preferences at any time via the “Cookie Settings” link in the footer of our website.

For detailed information about the cookies we use, their purposes, providers, and durations, please see our [Cookie Policy](#) [\[insert hyperlink\]](#).

7. Recipients and data sharing

We share personal data with the following categories of recipients:

- **Group entities** – our parent, subsidiary, and affiliated companies, including our UK parent, Irish entity, and US subsidiary, where necessary for the administration of our business, intra-group services, and consolidated reporting. Intra-group transfers are governed by an intra-group data transfer agreement incorporating appropriate safeguards.

- **Service providers (processors)** acting on our instructions, including:
 - Website hosting and infrastructure providers;
 - Cloud services and storage providers;
 - Email delivery, CRM, and marketing automation platforms (for example, HubSpot);
 - Analytics providers (for example, Google Analytics);
 - Event registration, webinar, and conferencing platforms;
 - IT support, cybersecurity, and backup providers;
 - Professional advisers (lawyers, accountants, auditors, insurers).
- **Third parties receiving data at your request** – for example, where you ask us to share information with a named colleague or partner organisation.
- **Regulators, courts, and public authorities** – where we are required to do so by law or where disclosure is necessary to protect our legal rights.
- **Parties to a corporate transaction** – in the event of a sale, merger, reorganisation, or other corporate transaction, personal data may be disclosed to the counterparty and its advisers, subject to confidentiality undertakings.

All processors acting on our behalf are bound by written data processing agreements that meet the requirements of Article 28 UK GDPR / EU GDPR.

8. International transfers

Some of the recipients listed above, and some of our group entities, are located outside the United Kingdom and the European Economic Area (EEA). In particular, personal data may be transferred to the United States (for example, in relation to our US subsidiary and certain cloud and marketing service providers).

Where we transfer personal data outside the UK or EEA, we rely on one or more of the following safeguards under Chapter V of the UK GDPR and EU GDPR:

- Adequacy decisions (for example, transfers to countries that the UK Government or European Commission has determined provide an adequate level of protection);
- The UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses;
- The European Commission's Standard Contractual Clauses (SCCs);
- The UK Extension to the EU-US Data Privacy Framework, where the recipient is certified under that framework.

Where required following Schrems II, we carry out transfer impact assessments and implement supplementary technical, contractual, or organisational measures as appropriate.

You may obtain a copy of the safeguards applied to any specific transfer by contacting our Data Protection Officer.

9. Data security

We implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage. These measures include:

- Encryption of data in transit (TLS) and encryption at rest for backups, where appropriate;
- Role-based access controls and the principle of least privilege;
- Multi-factor authentication for administrative access to key systems;
- Secure hosting environments and regular patching;
- Logging, monitoring, and incident response procedures;
- Vendor due diligence and contractual security obligations;
- Staff training on data protection and information security.

Our information security practices align with recognised industry standards. If you are a current or prospective customer and require further details (for example, in connection with vendor due diligence), please contact us.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the relevant supervisory authority and (where required) affected individuals in accordance with Articles 33 and 34 UK GDPR / EU GDPR.

10. Data retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

The table below sets out the retention periods we generally apply. Where a longer period is required by law, or is needed to establish, exercise, or defend legal claims, we may retain personal data for that longer period.

Category of data	Retention period	Rationale
Enquiry correspondence (name, business contact details, enquiry content)	Up to 3 years from last contact, unless an ongoing business relationship exists	Follow-up and record of business communications
Marketing contacts (name, business email, organisation, job title, preferences)	Until you unsubscribe, or 3 years of inactivity (no opens, clicks, or engagement), whichever is sooner	Maintaining an engaged marketing list and respecting dormant contacts
Records of consent and preference changes	6 years from the date the record was created	Accountability under UK GDPR / EU GDPR and evidence in the event of regulatory enquiry
Website analytics data (at aggregated / pseudonymised level)	Up to 14 months (Google Analytics default) or as configured in our analytics tools	Trend analysis and website improvement
Cookie-related identifiers on the device itself	As set out in our Cookie Policy (per cookie)	Varies by cookie purpose
Data retained under legal or regulatory obligation	The retention period required by the applicable law	Legal obligation

11. Your rights

Under the UK GDPR and EU GDPR, you have the following rights in respect of your personal data:

- **Right of access** – to obtain a copy of the personal data we hold about you (Article 15).
- **Right to rectification** – to have inaccurate personal data corrected and incomplete data completed (Article 16).
- **Right to erasure** – to have your personal data deleted in certain circumstances (“right to be forgotten”) (Article 17).
- **Right to restrict processing** – to have our processing of your personal data restricted in certain circumstances (Article 18).
- **Right to data portability** – to receive certain personal data in a structured, commonly used, and machine-readable format, and to transmit it to another controller (Article 20).
- **Right to object** – to object to processing based on legitimate interests (including profiling), and to object to processing for direct marketing at any time (Article 21).
- **Right to withdraw consent** – where we rely on your consent, you may withdraw it at any time (Article 7(3)).
- **Rights in relation to automated decision-making** – we do not carry out solely automated decision-making that produces legal or similarly significant effects via our website (Article 22).

- **Right to lodge a complaint** – you may lodge a complaint with a supervisory authority (see below).

You can exercise your rights by contacting our Data Protection Officer at dpo@cumulusneuro.com. We will respond within one month, although this period may be extended by a further two months where the request is complex or we have received a number of requests. We may need to verify your identity before responding.

In the United Kingdom, the relevant supervisory authority is:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, United Kingdom

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

In the Republic of Ireland, the relevant supervisory authority is:

Data Protection Commission (DPC)

21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

Website: <https://www.dataprotection.ie>

EU data subjects may also lodge a complaint with the supervisory authority in their country of residence, place of work, or place of the alleged infringement.

12. Children

Our website is intended for a professional audience and is not directed at children. We do not knowingly collect personal data from children under the age of 13 in the United Kingdom, or under the applicable digital consent age in the relevant EU member state (typically 16, but between 13 and 16 depending on the jurisdiction).

If you believe a child has provided personal data through our website, please contact our Data Protection Officer and we will take appropriate steps to remove it.

13. Third-party links

Our website may contain links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We are not responsible for the privacy practices or content of third-party websites. We encourage you to read the privacy policy of every website you visit.

14. Changes to this policy

We may update this Website Privacy Policy from time to time to reflect changes in our practices, in the services we provide, or in applicable law. Any updates will be posted on this page with a revised "Last updated" date. Where changes are material, we will take reasonable steps to bring them to your attention (for example, by email or by a notice on our website).

15. Contact us

If you have any questions about this Website Privacy Policy or how we handle personal data, please contact:

Data Protection Officer

Cumulus Neuroscience Limited

Concourse 3, Unit 5, Queens Road

Belfast, BT3 9DT

United Kingdom

Email: dpo@cumulusneuro.com

Company number: NI628481 (registered in Northern Ireland).