



PRIVACY POLICY

Last updated: August 2026

1. Introduction

TheraCryf Plc ("TheraCryf", "we", "us" or "our") respects your privacy and is committed to protecting your personal data.

This Privacy Policy explains how we collect, use, disclose, retain and protect personal data, and explains your rights in relation to that information.

This Privacy Policy applies where you:

- visit or interact with our website at www.theracryf.com;
- contact us or submit an enquiry;
- communicate with us by telephone, email, post or through our website;
- interact with us in a professional or business capacity;
- are a shareholder, investor, prospective investor or investment-sector contact;
- are a supplier, contractor, consultant, adviser or other business contact;
- contact us regarding employment or career opportunities;
- attend or communicate with us in connection with meetings, conferences, events or presentations;
- subscribe to or receive communications from us; or
- otherwise provide personal data to us.

Separate or supplementary privacy information may be provided where appropriate for particular processing activities, such as recruitment.

2. Who we are

The data controller is:

TheraCryf Plc

Company number: **09246681**

Registered office:

Alderley Park
Congleton Road
Nether Alderley
SK10 4TG
United Kingdom

Telephone: **+44 (0)1625 315 090**

General enquiries: enquiries@theracryf.com

For data protection enquiries, please contact our Data Protection Team at:

info@dataprivacyservices.co.uk

The current website identifies these company and data-protection contact details.



3. Data protection legislation

We process personal data in accordance with applicable data protection and privacy legislation, including, where applicable:

- the UK General Data Protection Regulation ("UK GDPR");
- the Data Protection Act 2018;
- the Data (Use and Access) Act 2025 ("DUAA");
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR"), as amended; and
- other applicable privacy and data protection legislation where our activities fall within its territorial scope.

The Data (Use and Access) Act 2025 amended aspects of the UK's data protection framework rather than replacing the UK GDPR or Data Protection Act 2018. Its data-protection provisions are now in force.

4. What is personal data?

"Personal data" means information relating to an identified or identifiable living individual. This can include obvious identifiers such as your name, address, telephone number and email address, as well as information such as online identifiers, IP addresses and other information that can identify an individual directly or indirectly.

Certain types of information receive additional protection under data protection law. These include "special category data", such as information concerning health, genetic or biometric information, racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, sex life or sexual orientation.

We will only process special category data where we have both a lawful basis and an additional condition permitting the processing.

5. The personal data we may collect

Depending upon your relationship and interaction with us, we may collect and process the following categories of personal data.

Identity information may include your name, title and other identifiers.

Contact information may include your business or personal email address, telephone number, postal address and other contact details.

Professional information may include your employer, organisation, position, job title, professional interests and business contact information.

Enquiry and correspondence information includes information contained in enquiries, emails, correspondence, telephone calls and other communications with us.

Investor and shareholder information may include information concerning investors, shareholders, analysts and other investment-sector contacts.



Supplier and professional contact information may include information relating to suppliers, advisers, consultants, research organisations, scientific collaborators, contractors and other organisations with whom we work.

Recruitment information may include your CV, employment history, qualifications, professional experience, contact information and information you voluntarily provide when enquiring about opportunities with TheraCryf.

Technical and website information may include:

- IP address;
- browser type and version;
- device information;
- operating system;
- referring website;
- pages visited;
- date and time of visits;
- interactions with our website;
- cookie identifiers; and
- analytics information.

We may also receive personal data from third parties or publicly available sources where lawful and appropriate.

6. How we collect personal data

We may collect personal data:

- directly from you;
- through our website and enquiry forms;
- through email, telephone and written correspondence;
- during meetings, conferences and events;
- through professional and commercial relationships;
- through recruitment enquiries;
- from professional advisers and service providers;
- from publicly available sources, including corporate and professional websites;
- from regulatory and official sources;
- from other organisations where they are legally permitted to provide information to us; and
- automatically through our website using cookies and similar technologies.

Where Article 14 applies because information has been obtained from another source, we will provide the required privacy information within the applicable period unless an exemption applies. ICO guidance generally requires privacy information to be provided within a reasonable period and no later than one month where information is obtained from another source.

7. How we use your personal data and our lawful bases

We will only process personal data where we have a lawful basis for doing so.



Depending upon the circumstances, we may process personal data for the following purposes.

Purpose	Typical lawful basis
Responding to enquiries and communications	Legitimate interests and/or steps prior to entering a contract
Managing business and professional relationships	Legitimate interests and/or performance of a contract
Managing relationships with suppliers, advisers, consultants and contractors	Contract and/or legitimate interests
Corporate administration and governance	Legal obligation and/or legitimate interests
Shareholder and investor relations	Legal obligation and/or legitimate interests
Regulatory and statutory reporting	Legal obligation
Protecting and enforcing our legal rights	Legitimate interests and/or legal obligation
Website operation, administration and security	Legitimate interests
Non-essential analytics and cookies	Consent where required by PECR
Recruitment and responding to career enquiries	Steps prior to entering a contract, legitimate interests and/or legal obligation
Maintaining appropriate business records	Legal obligation and/or legitimate interests
Preventing fraud, misuse and security incidents	Legitimate interests and/or legal obligation

Where we rely on legitimate interests, we consider the nature and purpose of the processing and balance our interests against the rights, freedoms and reasonable expectations of affected individuals.

Where we rely on consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing undertaken before consent was withdrawn.

8. Contact forms and enquiries

When you contact us through the website, we may collect information including your:

- first and last name;
- email address;
- company or organisation;
- location or county; and
- information contained in your enquiry.

The current website collects name, email, company and county information through its contact functionality.

We use this information to receive, assess, respond to and appropriately administer your enquiry.

Depending upon the nature of the enquiry, our lawful basis will ordinarily be our legitimate interests in communicating with people who contact the company or taking steps at your request before entering into a contract.



Where consent is genuinely required for a separate purpose, we will request it separately.

9. Recruitment and careers

If you contact us regarding a career opportunity or provide a CV, we may process information relating to your:

- identity and contact details;
- employment history;
- education;
- qualifications;
- professional skills and experience;
- CV and covering correspondence; and
- other information relevant to your enquiry or application.

We may use this information to assess your suitability for current or potential opportunities and administer our recruitment activities.

Where recruitment requires additional information, we may provide a separate recruitment privacy notice.

10. Cookies and similar technologies

Our website uses cookies and may use other similar technologies.

Cookies are small files stored on, or accessed from, your device. They may be used to operate the website, maintain security, remember preferences and understand how visitors use our website.

We distinguish between cookies and technologies that are **strictly necessary** to provide the website and those that are non-essential.

Where required by PECR, non-essential cookies will not be placed or accessed until you have provided the required consent.

You should be able to reject non-essential cookies as easily as you accept them and subsequently change your preferences.

11. Analytics

The current website states that it uses Google Analytics to monitor website usage.

Where analytics technologies involve storing information on, or accessing information from, a user's device and consent is required under PECR, we will obtain the required consent before activating them.

Analytics information may help us understand matters such as:

- numbers of visitors;
- pages visited;
- how visitors navigate the website;
- approximate location;
- browser and device characteristics; and
- website performance.

The website's separate cookie notice/banner should contain an up-to-date cookie inventory rather than relying upon a static list in this Privacy Policy.



12. Sharing personal data

We may disclose personal data to third parties where reasonably necessary and lawful.

Recipients may include:

- companies and organisations providing IT, hosting, cybersecurity or technical services;
- website service providers;
- analytics providers;
- professional advisers;
- accountants and auditors;
- lawyers;
- corporate advisers;
- communications and public-relations providers;
- recruitment providers;
- scientific, research and commercial partners where appropriate;
- suppliers and contractors;
- banks, insurers and financial institutions;
- regulators and public authorities;
- law-enforcement agencies;
- courts and tribunals; and
- prospective purchasers, investors, sellers or advisers in connection with a corporate transaction, investment, restructuring, merger, acquisition or disposal.

Where an organisation processes personal data on our behalf as a processor, we require appropriate contractual protections in accordance with applicable data protection law.

We **do not sell personal data**.

13. International transfers

Some organisations with whom we work or whose services we use may process personal data outside the United Kingdom.

Where this constitutes a restricted transfer under UK data protection law, we will ensure that an appropriate transfer mechanism is available.

Depending upon the circumstances, this may include:

- UK adequacy regulations;
- an appropriate UK International Data Transfer Agreement;
- the UK Addendum to the EU Standard Contractual Clauses; or
- another lawful transfer mechanism or derogation where applicable.

Where required, we will consider whether the level of protection afforded to transferred personal data is not materially lower than that provided under UK data protection law and implement additional safeguards where appropriate.

ICO guidance requires privacy information to explain applicable safeguards for relevant international transfers and how individuals can obtain information about them.



14. Data security

We maintain appropriate technical and organisational measures designed to protect personal data against:

- accidental or unlawful destruction;
- loss;
- alteration;
- unauthorised disclosure;
- unauthorised access; and
- other unlawful processing.

Depending upon the circumstances and risks involved, these measures may include access controls, authentication, secure systems, security monitoring, staff awareness and training, supplier controls, backup and recovery arrangements, incident-response procedures and other appropriate information-security measures.

Access to personal data is limited to people who have an appropriate business requirement to access it.

15. Personal data breaches

We maintain procedures for identifying, assessing, managing and documenting personal data breaches.

Where a personal data breach is likely to result in a risk to the rights and freedoms of individuals, we will notify the Information Commissioner's Office where required by law and, where applicable, within 72 hours of becoming aware of the breach.

Where a breach is likely to result in a **high risk** to an individual's rights and freedoms, we will also communicate the breach to affected individuals without undue delay unless an applicable exception applies.

We maintain appropriate records of personal data breaches, including breaches that do not require notification.

16. Data retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected and to meet applicable legal, regulatory, contractual, accounting and reporting requirements.

Retention periods vary according to the type of information and purpose of processing.

When determining an appropriate retention period, we consider:

- the purpose for which the information is held;
- the amount, nature and sensitivity of the information;
- applicable legal and regulatory requirements;
- contractual obligations;
- relevant statutory limitation periods;
- the potential risk arising from unauthorised use or disclosure; and
- whether the purpose can be achieved without retaining identifiable information.



When personal data is no longer required, it will be securely deleted, destroyed or anonymised as appropriate.

The ICO requires privacy notices to state either the relevant retention periods or the criteria used to determine them.

17. Your rights

Depending upon the circumstances and lawful basis for processing, you may have the following rights:

- **Right to be informed** – to receive information about how your personal data is collected and used.
- **Right of access** – to request access to your personal data and supplementary information concerning its processing.
- **Right to rectification** – to request correction of inaccurate information and completion of incomplete information.
- **Right to erasure** – to request deletion of personal data in circumstances specified by law.
- **Right to restriction** – to request restriction of processing in certain circumstances.
- **Right to data portability** – in applicable circumstances, to receive certain personal data in a structured, commonly used and machine-readable format or request its transmission to another controller.
- **Right to object** – to object to certain processing based upon legitimate interests or the performance of a task in the public interest.
- **Right to object to direct marketing** – you have the right to object at any time to processing of your personal data for direct-marketing purposes.
- **Rights concerning automated decision-making** – you may have rights and safeguards in relation to certain significant decisions made solely by automated means.
- **Right to withdraw consent** – where we rely upon consent, you may withdraw it at any time.

These rights are not absolute and exemptions or restrictions may apply in particular circumstances. ICO guidance confirms that privacy information should explain the rights applicable to the particular processing and that the right to object should be brought clearly to people's attention.

18. Exercising your rights

To exercise a data protection right, please contact:

Data Protection Team

Email: info@dataprivacyservices.co.uk

You do not normally have to pay a fee to exercise your rights.

We may ask for information reasonably necessary to verify your identity. We may also ask you to clarify a request where permitted and reasonably necessary.



Where responding to a subject access request, we will conduct searches that are **reasonable and proportionate**, in accordance with the current UK data protection framework.

We will respond within the applicable statutory timeframe.

19. Data protection complaints – Right to Complain

If you have concerns about how TheraCryf plc processes your personal data, you have the right to make a complaint directly to us.

You can make a complaint by:

- Emailing enquiries@theracryf.com
- Completing our [contact form](#) on our website
- Calling our main office number

Data Protection Team

info@dataprivacyservices.co.uk

We will facilitate the making of complaints, acknowledge a qualifying data-protection complaint within the statutory period and take appropriate steps to investigate and respond without undue delay.

This is an important addition to the existing policy. Following the DUAA changes, organisations must facilitate complaints, acknowledge them within **30 days**, and respond without undue delay.

Note – If you remain dissatisfied after we have responded to your complaint, you have the right to complain to the Information Commissioner's Office (ICO).

Website: www.ico.org.uk

Refer to our **Data Handling Complaints Process** for more information.

Commented [MD1]: This will need to be linked to the new process when it is uploaded onto the website

20. Complaints to the Information Commissioner's Office

You also have the right to raise a concern or lodge a complaint with the UK's data protection regulator:

Information Commissioner's Office (ICO)

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
United Kingdom
Telephone: **0303 123 1113**

Further information is available from the ICO website.



We would appreciate the opportunity to address your concerns directly and encourage you to contact our Data Protection Team in the first instance, although this does not affect your right to approach the ICO.

21. Automated decision-making and profiling

We do not currently intend to make decisions about website visitors based solely upon automated processing that produce legal or similarly significant effects unless this is specifically disclosed and permitted by applicable law.

If we introduce such processing, we will provide appropriate transparency and implement the safeguards required under UK data protection legislation.

The DUAA has changed the UK framework for significant automated decision-making, while retaining safeguards for affected individuals.

22. Children's personal data

Our corporate website is not directed towards children and we do not intentionally use it to collect personal data directly from children.

If we become aware that children's personal data has been collected in circumstances requiring additional protections, we will take appropriate action in accordance with applicable law.

23. Third-party websites

Our website may contain links to websites, services or resources operated by third parties. Those organisations are responsible for their own processing activities and privacy practices. This Privacy Policy does not govern independent third-party websites.

We recommend reviewing the privacy information provided by the relevant third party before submitting personal data.

24. Corporate transactions

If TheraCryf is involved in a proposed or completed investment, financing, reorganisation, merger, acquisition, sale of assets or similar corporate transaction, personal data may be disclosed to prospective or actual investors, purchasers, professional advisers and other relevant parties where lawful and reasonably necessary.

Appropriate confidentiality and data protection measures will be applied where required.

25. Changes to this Privacy Policy

We review this Privacy Policy periodically and may update it to reflect:

- changes to our processing activities;
- changes to our website;
- changes to service providers or technologies;
- organisational changes;
- regulatory guidance; or
- changes to applicable law.



The latest version will be made available on our website and the “Last updated” date will be amended accordingly.

Where a change materially affects how we process personal data, we will take appropriate steps to bring the change to the attention of affected individuals.

26. Contact us

Questions about this Privacy Policy or our processing of personal data should be directed to:

Data Protection Team

Email: info@dataprivacyservices.co.uk

or:

TheraCryf Plc

Alderley Park
Congleton Road
Nether Alderley
SK10 4TG
United Kingdom

Email: enquiries@theracryf.com

Telephone: **+44 (0)1625 315 090**