

## ANGLE plc Website Privacy Policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors.
- 1.2 This ANGLE plc Website Privacy Policy (the "Policy") applies where we are acting as a data controller with respect to the personal data of our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We will ask you to consent to our use of cookies in accordance with the terms of this Policy when you visit our website.
- 1.4 In this Policy, "ANGLE", "we", "us" and "our" refer to ANGLE plc and its subsidiaries. For more information about us, see Section 13.

### 2. How we use your personal data

- 2.1 In this Section 2 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) the purposes for which we may process personal data; and
  - (c) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical data, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.3 We may process your information included in your contact details section on our Email alert page in the Investor Relations section of our website ("**contact data**"). The contact data may include your name, country of residence, email address, and occupation type. The contact data may be processed for services such as emailing you our Stock Exchange announcement alerts and any other information relevant to ANGLE plc that we consider could be of interest. The legal basis for this processing is consent.
- 2.4 We may process information contained in any enquiry you submit to us regarding our products and services, instrument user guides, application notes, licensing opportunities, or opportunities to collaborate or form partnerships, or any other enquiry that you may submit in respect of our business activities ("**enquiry data**"). The enquiry data may include your name, email address, country of residence, institution or company to which you are affiliated, and may be processed for the purposes of sending you the correct user guides or application notes, for answering any questions you have

regarding the purchase or rental of relevant products and services, for assisting you with any technical or performance queries you may have regarding our products or applications, for forming the basis of any partnership, collaboration or licensing discussions, or for assisting you with any other business enquiry you may have. The legal bases for this processing are our legitimate interests, such as ensuring we provide the best service, product, application note or user guide for your needs, and fulfilling our contractual obligations, such as warranty fulfilment and product support.

- 2.5 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 2.6 We may process any of your personal data identified in this Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.7 We may process any of your personal data identified in this Policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.8 In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.9 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to any member of our group of companies (this means our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Policy.
- 3.2 We may disclose your personal data to our insurers and professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

- 3.3 We use a third party, Investis Limited (“Investis”), to process information that you provide to us for the purpose of subscribing to our Stock Exchange announcement alerts and sending you any other information on ANGLE plc that we consider could be of interest (“**contact data**”). The contact data may be processed for the purposes of sending you the relevant alerts and information. The legal basis for this processing is consent. You can withdraw your consent to receive these alerts at any time by changing your preferences on the relevant page in our Investor Relations section of our website. You can find information about their privacy policy on their website <http://www.investis.co.uk/>
- 3.4 We use a third party, SoBold Limited (“SoBold”), to manage our website. They have access to the **enquiry data** that you provide to us when using our “Contact Us” forms. The enquiry data may be processed and stored for the purposes of allowing us to respond best to your query. The legal basis for this processing is legitimate interests. You can find information about SoBold’s privacy policy on their website <https://sobold.co.uk/>
- 3.5 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **4. International transfers of your personal data**

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2 We have offices and facilities in the United States of America (“USA”) and Canada. The European Commission has made an “adequacy decision” with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)
- 4.3 Our hosted email servers are situated in the USA. Any contact, enquiry or correspondence data or any other personal data included when contacting us via our website forms or by direct email will therefore pass through the USA. The European Commission has made an “adequacy decision” with respect to the data protection laws of this country. Transfers to this country will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

4.4 We use a third party, Investis Limited (“Investis”), to process information that you provide to us for the purpose of subscribing to our Stock Exchange announcement alerts and sending you any other information on ANGLE plc that we consider would be of interest. Any contact data you provide may pass outside the UK and the European Economic Region to Investis Inc. (in the U.S.), and Investis Corporate Communications Private Limited (in India). Transfers to these countries will be protected by appropriate safeguards on the basis of these entities having entered into standard contractual clauses with Investis as set out in the European Commission's Decision 2010/87/EU of 5 February 2010 for the transfer of personal data to processors established in third countries.

## **5. Retaining and deleting personal data**

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

(a) Usage data will be retained for 26 months following the website visit date, after which it will be deleted.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of contact data will be determined based on how long you consent to receive our communication alerts;

(b) the period of retention of enquiry data will be determined based on the nature of the enquiry. For example, where the enquiry relates to any of our products in the field, the data may be held to monitor product performance, until the product line is no longer in use and any warranties or product claim periods have expired. Where an enquiry relates to a collaboration, partnership or licensing agreement, the data may be retained for a period of time until it is no longer considered likely that an agreement will be made, or for a further six years after the agreement or collaboration expires, or later, if the agreement or collaboration terms require. The enquiry data held by SoBold will be retained for 26 months following the enquiry date, after which it will be deleted.

(c) the period of retention of correspondence data will be determined based on similar criteria as in (b) above.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which

we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Amendments**

- 6.1 We may update this Policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this Policy.

## **7. Your rights**

- 7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2 Your principal rights under data protection law are:
  - (a) the right to be informed;
  - (b) the right of access;
  - (c) the right to rectification;
  - (d) the right to erasure;
  - (e) the right to restrict processing;
  - (f) the right to data portability;
  - (g) the right to complain to a supervisory authority; and
  - (h) the right to withdraw consent.
- 7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data within one month of receiving your request. The first copy will be provided free of charge (so long as the information requested is not manifestly unfounded or excessive) but additional copies may be subject to a reasonable fee.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in

relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 You have the right to receive your personal data from us in a structured, commonly used and electronic format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling +44 (0)303 123 1113 or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns). If you are based outside the UK, you have the

right to lodge your complaint with the relevant data protection regulator in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by written notice to us.

## **8. About cookies**

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its' set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **9. Cookies that we use**

9.1 We use the following types of cookies:

- (a) Necessary – necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies;
- (b) Preference – preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in;
- (c) Statistics – statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously;
- (d) Marketing – marketing cookies are used to track visitors across websites. The intention is to display advertisements that are relevant and engaging for the individual user and therefore more valuable for publishers and third party advertisers.

9.2 You can see which cookies we use by viewing our Cookie Declaration also published on our website.

## **10 Cookies used by our service providers**

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are listed on our Cookie Declaration.
- 10.3 We use Investis to manage our Stock Exchange announcement and alerts containing other relevant information to ANGLE plc (see Section 3). This service uses cookies to preserve users' session states across page requests and to distribute traffic to the website on several servers in order to optimize response times. You can view the privacy policy of this service provider on their website <http://www.investis.co.uk/> The relevant cookies are listed on our Cookie Declaration.
- 10.4 We use SoBold to manage our website (see Section 3). They also store information included in any "Contact Us" enquiry made through our website. They do not add any cookies to our website. You can view the privacy policy of this service provider on their website <http://www.sobold.co.uk/>

## **12. Managing cookies**

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

## **13. Our details**

13.1 This website is owned and operated by ANGLE plc.

13.2 We are registered in England and Wales under registration number 04985171 and our registered office is at 10 Nugent Road, Surrey Research Park, Guildford, Surrey, GU2 7AF, UK.

13.3 Our principal place of business is at the above address.

13.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

#### **14. Data Protection Officer**

14.1 You can contact our data protection officer by writing to:

Data Protection Officer - ANGLE plc  
10 Nugent Road  
Surrey Research Park  
Guildford  
Surrey  
GU2 7AF  
United Kingdom

Or by emailing: [DPO@angleplc.com](mailto:DPO@angleplc.com)