Privacy policy & data subject rights

Introduction

Aspire Scientific Limited (the "**Company**", "**we**", and/or "**our**") 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 we will collect;
- what we will do with it and why;
- how long we will keep the data.

This privacy policy, together with our terms and conditions and any additional terms, applies to your use of our services and use of our website. It also applies where you interact with us in other ways, including where you apply for a role with us or otherwise provide personal data in connection with employment or recruitment processes, such as submitting an application, CV, or other information as a candidate.

If you are based in the European Union, additional information about how we process your personal data is available in our European Union/European Economic Area (EEA) privacy policy.

Identity and contact details

Aspire Scientific Limited's registered address is Fourth Floor, Unit 5b, The Parklands, Lostock, Bolton, BL6 4SD, and our postal address is Stanford Business Court, Unit 5, Stanford in the Vale, Oxfordshire, SN7 8LH.

You can contact us about any data protection issues relating to the Company by emailing dataprotection@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). Our registration number is ZA423382.

The individual in charge of Data Protection in our Company can be contacted at dataprotection@aspire-scientific.com.

Changes to our privacy policy

We may need to update our privacy policy from time to time. Any changes we make to our privacy policy will be posted on this page; however, if there are any significant changes, we will let you know and explain the changes.

You are also welcome to request a current copy by writing to us at the address above at any time.

Third-party links

Our website may include links to third-party websites of interest, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified. This does not include data where your identity has been removed (such as anonymous data).

The personal data we collect from you depends on how you interact with us, such as whether you are a client, a specialist or expert (including healthcare professionals, healthcare advisors, or other individuals in the healthcare sector working with us as an author, advisor, event attendee, or in another professional capacity), an employee, a supplier, or a candidate.

The personal data we may collect, use, store, and/or transfer about you has been grouped together as follows:

For clients, prospective clients, specialists/experts, and our suppliers, the data we may collect includes:

- **Identity data:** includes first name, last name, username or similar identifier, title, date of birth, gender, and passport/identity document details;
- **Contact data:** includes postal address, email address, and telephone numbers;
- **Transaction data:** includes details about payments to and from you and other details of products and services you may have purchased from us;
- **Technical data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID, and other technology on the devices you use to access this website;
- **Login and profile data:** includes your username and password, interests, preferences, feedback, and survey responses;

- **Usage data:** includes information about how you interact with and use our website and services;
- **Marketing and communications data:** includes your preferences in receiving marketing from us and our third parties, and your communication preferences;
- **Competition and promotion data**: includes information you provide when entering competitions, prize draws, or similar promotions, such as your name, contact details, details of your entry, and any information required to administer the promotion, verify eligibility, and award prizes;
- **Publicly available information:** includes information available on third-party sites such as social media sites;
- **Educational and biographical data:** includes job title, specialisms, professional qualifications and licensing, work history, and achievements;
- **Financial data:** includes bank account details;
- **Sensitive data:** includes health or religious information (where it is necessary to make travel, accommodation, and entertainment bookings);
- **Due diligence data:** includes information required to conduct reasonable due diligence, such as debarment, sanctions, and financial health information.

For our employees, the data we may collect includes:

- **Identity data:** includes first name, last name, username or similar identifier, title, date of birth, gender, ID/right to work data, emergency contact details, photographs, and passport/identity document details;
- **Contact data:** includes address, email address, and telephone numbers;
- **Immigration-related information:** includes information relevant to evidence of your right to work;
- **Financial data:** includes bank account numbers, tax identification numbers (e.g., national insurance numbers), salary history, and bonuses;
- **Employment and contractual data:** includes employment agreements, job descriptions, start/end dates, position, compensation, benefits, and union affiliation;
- **Performance and personnel records:** includes performance appraisals, training records, disciplinary actions, and certificates of qualification;
- **Education and biographical information:** includes previous work experience, education history, qualifications and skills information, interests, and any other information that you provide to us;
- **Sensitive data:** includes health information (for sickness records or adjustments), criminal records (where required), health or religious information (where it is necessary to make travel, accommodation, and entertainment bookings), and equality monitoring data (e.g., race and gender).

For recruitment candidates, the data we may collect includes:

- **Identity data:** includes first name, last name, title, job title, address, telephone number, photographic identification, and date of birth;
- **Contact data:** includes email address, home address, and telephone numbers;
- **Immigration-related information:** includes information relevant to evidence of your right to work;
- **Application-related information:** includes previous work experience, education history, qualifications and skills information, interests, and any other information that you submit to us;
- **Recruitment information:** includes assigned application number, information about your performance in recruitment assessments, video interview footage, and any other information that you submit to us, including any correspondence you may have with us during the recruitment process.

When you are applying for a role with us, we may undertake background checks.

How is your personal data collected?

We use different methods to collect information from and about you.

We collect personal data directly from you when you contact us, including when you use any of our services.

We also collect personal data when you visit and/or contact us, request information from the website, register for services, engage with us via social media, or otherwise engage with us.

We may also receive personal data from third parties.

We may collect personal data about employees and candidates directly from you during the course of your employment or application process, or from other sources such as recruitment agencies, job boards, or professional networking platforms (such as LinkedIn).

How is your personal data collected?

We only use your personal data where the law allows us to do so. Most commonly, we use your personal data:

- **to comply with our legal and regulatory obligations**, where we are required to process personal data under applicable laws and regulations, including those relating to publishing, intellectual property, research integrity, safeguarding (including in relation to children and vulnerable individuals), and law enforcement requirements, provided such processing is necessary to meet those obligations;

- **for the performance of a contract with you**, or to take steps at your request before entering into such a contract;
- **for our legitimate interests (or those of a third party)**, where this is necessary for the operation and management of our business, including delivering and improving our services, managing relationships with specialists/experts and partners, and ensuring the security of our systems. We carefully consider and balance any potential impact on you before relying on this basis;
- **where you have given us your clear and active consent** to use your personal data for a specific purpose; for example, where you choose to subscribe to updates or publications.

Below is a list of the purpose and reasons for our use of your information:

For specialists/experts, suppliers, clients, and prospective clients	
Purpose/use	**Our reasons**
To provide services to clients and perform contractual obligations	We process personal data as necessary for the performance of a contract with our clients
To attribute authorship of materials and share information with publishers and congress organisers	We process personal data for our legitimate interests in conducting our business and ensuring proper attribution of authorship
To share author information with publishers and congress organisers	We process personal data for our legitimate interests in facilitating publication and participation in events
To communicate with prospective clients and undertake marketing activities	We process personal data for our legitimate interests in promoting our services and developing our business. Where required by law, we rely on consent for marketing communications
To participate in any competitions, prize draws, or similar promotions we run	We process personal data required to administer promotions, verify eligibility, and award prizes
To arrange travel, accommodation, catering, or other logistics	We process personal data as necessary for making logistical arrangements in the performance of a contract with our clients

For employees	
Purpose/use	**Our reasons**
To enter into and perform employment contracts	We process personal data as necessary for the performance of your employment contract
To administer payroll, tax, and statutory reporting obligations	We process personal data as necessary to comply with our legal obligations, including HMRC reporting requirements

To administer benefits schemes (e.g., pension, health benefits, income protection, life assurance, and the electric car scheme)	We process personal data as necessary for the administration of your benefits
To retain employment records in line with legal requirements	We process personal data as necessary to comply with statutory retention obligations
To manage internal business operations (e.g., IT systems, email accounts, and administration)	We process personal data for our legitimate interests in ensuring the efficient operation and administration of our business

For candidates	
Purpose/use	**Our reasons**
To assess candidates and manage recruitment processes	We process personal data for our legitimate interests in recruiting employees and assessing suitability for roles
To communicate with candidates regarding employment opportunities	We process personal data for our legitimate interests in progressing recruitment processes

Special category personal data

We may process special category data (such as information relating to health) in limited circumstances. Where we do so, we will only process this data where permitted under the relevant data protection laws.

In particular:

- For recruitment candidates, we may process special category data where necessary for the purposes of assessing fitness to work or complying with employment law obligations.
- For employees, we process special category data where necessary to carry out our obligations and exercise our rights in connection with employment, social security, or social protection law; for example, equal opportunities information, race or ethnicity, religious beliefs, and sexual orientation.

For certain roles, we may request background checks from public authorities or financial organisations to consider your eligibility for certain roles, positions, and/or projects.

We do not generally process special category personal data in relation to authors, publishers, specialists/experts, clients and/or prospective clients. However, in limited circumstances, we may process certain special category data, such as information relating to health, dietary requirements or religious beliefs, where this is strictly necessary to arrange or facilitate travel, accommodation, catering, or other event-related logistics. In such cases, this data will only be processed where permitted under applicable data protection legislation and subject to appropriate safeguards and this privacy policy.

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Keeping your personal data accurate

It is important that the personal data that we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

If you believe that any of your information that we process is incorrect or incomplete, please contact us using the contact details and we will take reasonable steps to check its accuracy and correct it where necessary.

Who we share data with

We only share your personal data with trusted third parties, where it is necessary and lawful to do so.

Your personal data may be shared in connection with the delivery of our services and the operation of our business.

This may include sharing with our clients, authors, publishers, partners, and service providers, where relevant to your relationship with us, including in connection with your employment with us or your application for a role.

We may share your personal data for the following reasons:

- To comply with legal or regulatory obligations, including responding to lawful requests from regulators, law enforcement, or other authorities;
- To perform a contract with you, or to take steps at your request before entering into a contract;
- To provide and deliver our services, including collaborating with clients, publishers, and other partners in the preparation, publication, and promotion of scientific communications;
- To enforce our contractual rights or protect our legitimate business interests;
- To administer recruitment processes, assess candidate suitability, and manage our employment relationship with employees;
- To prevent, detect or investigate fraud, security incidents, or other unlawful activity, and to assist law enforcement where required;
- To protect the rights, property, or safety of our business, our clients, authors, employees, or others;
- Otherwise, where permitted under applicable laws.

We may also share your personal data with trusted third parties who support the operation and management of our business.

This includes service providers who assist us with areas such as IT systems, data hosting, marketing and communications, publishing support, recruitment support, HR administration, payroll, benefits administration, and professional advisory services.

These third parties are subject to appropriate contractual safeguards and are only permitted to process your personal data in accordance with our instructions.

Examples of when we may share your personal data with third parties include:

- **Data processors (service providers acting on our behalf):** as the data controller, 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;
- **Publishers and congress organisers:** we transfer contact details and other data relating to authors of the papers and other material that we work on to publishers. We also transfer contact details and other data relating to authors of presentations, posters, or slide decks on to congress organisers;
- **Clients and partners:** where appropriate, and with consent where required, we may share personal data relating to suppliers or third parties with our clients or partners; for example, to support the delivery of services;
- **Recruitment providers:** we may share candidate data with recruitment agencies, job boards, and assessment providers as part of the recruitment process;
- **Background checking and onboarding providers:** where appropriate, we may share candidate or employee data with third-party providers who support pre-employment screening, right-to-work checks, and onboarding processes;
- **Supplier due diligence providers:** where appropriate, we may share supplier data with third-party providers supporting due diligence checks;
- **Employee benefit providers (such as pension providers):** we share data on employees with organisations, where we function as an intermediary between the employees and the organisation who provides benefits to them (e.g., pension providers).

Information received from third parties

In addition to the personal data you provide to us directly, we may obtain personal data about you from other third-party sources.

For specialists/experts, clients, and prospective clients:

In the context of our services, this may include information provided by publishers, clients, collaborators, conferences or congress organisers, or other partners in connection with the preparation, review, or publication of scientific communications.

For example, we may receive author details, affiliation information, or contact details from publishers or clients, or information relating to presentations, abstracts, or other materials from event organisers.

We may also receive personal data from publicly available sources, such as institutional websites, professional profiles, or published research, where relevant to the services we provide.

For candidates and employees:

In the context of recruitment and employment, this may include information obtained from referees, recruitment agencies, background check providers, or publicly available sources such as professional networking sites. This may include details relating to your employment history, qualifications, experience, and suitability for a role.

We may also receive personal data from third-party service providers in connection with pre-employment screening, verification checks, or the provision of employment-related services, as well as from benefit providers and other organisations where relevant during your employment.

Use of photographs, images, and video footage

We may collect and use photographs, images, and video footage in connection with our services and activities. This may include images provided by specialists/experts, contributors, and partners for use in publications, marketing materials, and promotional content, as well as images captured at events, conferences, or other business activities.

We use this information to operate and promote our services, including showcasing authors and publications, creating and distributing marketing materials, and enhancing the visibility of our content across our websites, social media channels, and other communications. This may include the use of tools and systems, including artificial intelligence (AI)–based technologies, to edit, enhance, or improve the quality of images.

Where required, we will obtain appropriate consent, particularly where images are used for promotional or marketing purposes, or where individuals are clearly identifiable. In other cases, we may rely on our legitimate interests in promoting our business and its activities, provided this does not override your rights and interests.

Artificial intelligence

We may use AI technologies to deliver improvements and benefits to our services and, ultimately, the healthcare sector.

Internally, AI is used to drive efficiencies in line with our internal policies and procedures (including safeguards and human oversight, where applicable).

Your personal data may be processed by providers of AI either directly sourced by us or via third-party AI tools embedded in systems providing IT services to us. Any use of AI technologies by us will be in accordance with technical and operational safeguards appropriate for data types. We use AI platforms such as Microsoft Copilot, ChatGPT, Octoparse, and Claude, and AI functionality embedded within other software such as Adobe Acrobat. Where possible, we use closed and contractually governed versions of these tools that provide appropriate protections and do not use our data to train underlying models. We have implemented internal policies and controls governing the use of AI, including guidance on when personal data can be used, restrictions on sensitive data, and requirements for human oversight. We also take reasonable steps to ensure that any third-party providers process personal data securely and only in accordance with our instructions.

We use automated technologies or interactions as you interact with our website; we may automatically collect technical data about your equipment, browsing actions, and patterns. This may also include your IP address. We collect such personal data by using cookies, server logs, and other similar technologies. Please see our cookie policy for further details.

We do not make decisions based solely on automated processing that produce legal or similarly significant effects unless strict legal requirements are met and appropriate safeguards are in place. If we do, we will provide you with further information.

International transfer of data

In some instances, the publishers of the materials that we work on reside in countries outside of the UK and/or the EEA.

Where we transfer personal data outside the UK, we ensure they are protected by appropriate safeguards. This includes transfers to countries deemed to provide an adequate level of protection (an 'adequacy decision'), meaning data is safeguarded to UK-equivalent standard. Where no such decision exists, we implement appropriate safeguards, such as standard contractual clauses and supplementary measures.

In the event we need to transfer your personal data outside the UK or the EEA (for example, to a publisher or third-party service provider), we will ensure we have adequate safeguards in place to do so. Our safeguards ensure that your personal data receives the same protection as if they were being processed inside the UK.

Any transfer of your personal data will follow applicable laws, and we will follow the guiding principles of this privacy policy.

Deletion of data

We will not keep your personal data for longer than we need it for the purpose for which it is used, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

Our retention periods can be described, in general, as follows:

- Data relating to clients will be deleted 10 years after the end of the most recent contract involving the customer;
- Data relating to unsuccessful applications to become an employee will be removed 18 months after the application;
- Data relating to unsuccessful applications to become a contractor or freelancer will be removed 6 years after the application in case work becomes available for that individual;
- Data relating to employees will be deleted 7 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 some instances, this data retention timescales may be 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 accidental or unlawful destruction, loss, misuse, or unauthorised alteration of personal data. These measures include safeguards designed to ensure the ongoing confidentiality, integrity, availability, and resilience of our systems and services.

We store the personal data that we collect securely, using systems and controls appropriate to the nature, sensitivity, and associated risk of the data. Access to personal data is restricted to those who have a legitimate business need to know.

While we are committed to maintaining a high level of security, we do not publish detailed information about our specific security measures, as this could compromise their effectiveness. Further information can be provided on request, where appropriate.

Marketing

Where you use our services as a client or specialist/expert, we may use your personal data to send you updates by email, telephone, or post about our services, publications, events, insights, and other content that may be of interest to you.

We aim to provide you with clear choices regarding how your personal data is used for marketing and communications.

Where you have given your consent to receive marketing communications, you can withdraw this consent at any time. Where we rely on our legitimate interests to send you marketing (for example, where we have an existing relationship with you), you have the right to object at any time.

You can opt out of receiving marketing communications at any time by following the unsubscribe instructions in our emails, or by contacting us using the details set out in this policy.

Please note that opting out of marketing communications will not affect essential service communications, such as those relating to the services we provide to you, updates about your account, or important notices regarding our business relationship.

We may periodically ask you to confirm or update your marketing preferences, particularly where there are changes to our services, the law, or our business operations.

We will always treat your personal data with respect and will not sell your personal data to third parties for their own marketing purposes.

Your legal rights

You have a number of rights under data protection laws in relation to your personal data. These rights include:

- **Requesting access to your personal data (commonly known as a 'subject access request').** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Requesting correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Requesting erasure of your personal data in certain circumstances.** This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request

of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

- **Objecting to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your right to object.
- **Objecting, at any time, to the processing of your personal data for direct marketing purposes.** Where your details are used for marketing, you can opt out at any time. You can unsubscribe from marketing on each contact, or you can contact us to object to any processing.
- **Requesting the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use, or where we used the information to perform a contract with you.
- **Withdrawing consent.** You can withdraw your consent at any time in situations where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Requesting restriction of processing your personal data.** This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
    - If you want us to establish the data's accuracy;
    - Where our use of the data is unlawful, but you do not want us to erase it;
    - Where you need us to hold the data even if we no longer require it, as you need it to establish, exercise, or defend legal claims;
    - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Not being subject to automated decision making and profiling.** You have the right to not be subject to solely automatic decisions (i.e., decisions that are made about you by a computer, without any human input) that have a legal or similarly significant effect on you.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights); however, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within 1 month. Occasionally, it could take us longer than 1 month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How can we help?

If you have any questions or complaints about how we handle your personal data, you can contact us through:

- Online complaint form
- Email: dataprotection@aspire-scientific.com
- Post: Stanford Business Court, Unit 5, Stanford in the Vale, Oxfordshire, SN7 8LH

We will:

- Acknowledge receipt no later than 30 days from receiving it;
- Take appropriate steps to respond without undue delay, which may include making enquiries into the subject matter of the complaint and, where appropriate, keeping you informed about our progress handling the complaint;
- Inform you of the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's contact details are available at https://ico.org.uk/global/contact-us/.

Aspire Scientific Operations

Update: July 2026

Next review due: July 2027

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