

Clinpal's Privacy Policy

The Clinpal™ Site you are using is provided by eClinicalHealth Limited with the aim to improve clinical research for the benefit of patients.

1. Introduction

- 1.1 Clinpal™ is a brand name of eClinicalHealth Limited (referred to as “eClinicalHealth”, “we”, “our” or “us”), a company registered in the UK and whose registered address is Logie Court, Stirling University Innovation Park, Stirling, FK9 4NF, UK.
- 1.2 eClinicalHealth has developed the Clinpal™ platform with the aim to improve effectiveness and productivity in clinical studies by providing patients, clinical sites, sponsors and other key stakeholders with one integrated scalable solution that extends from the study start up and patient recruitment, through the duration of the study, and on to post-trial follow up.
- 1.3 eClinicalHealth respects data privacy and is deeply committed to the protection of any personal information submitted to and hosted by us. We comply with UK and EU data protection legislation in the collection and use of personal information and take all reasonable measures to ensure that the collection and use of your data will be fair and lawful.
- 1.4 For the purpose of the registration with the Information Commissioner's Office (ICO) our notification number is ZA104320 when eClinicalHealth is acting as data controller.
- 1.5 This policy gives you information about the collection, use and retention of the information you provide through the Clinpal platform (the “Site”).

2. Collection and use of your information

- 2.1 You can visit the Site without providing any personal or sensitive personal information. We collect personal or sensitive personal information only with your consent, which forms the lawful basis for our processing. The data we collect will only be used for the purpose for which you have given your consent, except where otherwise provided by law. eClinicalHealth limits the collection and processing of your data to those who are absolutely necessary for the purpose of its use.
- 2.2 In order to be considered for possible enrolment in a clinical study, you may be asked to provide some personal sensitive information as part of a pre-screening questionnaire. The type of data that is collected in this case depends on the clinical study. This information is required to assess if you

satisfy the requirements for the study. If you meet the pre-qualification criteria for a study, your information will be forwarded to the clinical site you expressed interest in for further evaluation.

- 2.3 Anonymised data such as details of visits to the Site may also be collected. This may include but is not limited to, location data, and other communication data.
- 2.4 In accordance with the Children's Online Privacy Protection Act (COPPA), we will not knowingly collect any information from children under the 13 years of age or any individuals that are defined as minors under law in their country of residence without verifiable parental consent. Parents can revoke their consent and ask that information about their children be deleted from the Site, by contacting us as described in paragraph 9 “Contact” of our Privacy Policy. To do this or to review personal information collected from children, we must verify the identity of the requesting parent. When a parent revokes consent, we will stop collecting, using, or disclosing information from that child. To respect the privacy of parents, information collected and used for the sole purpose of obtaining verifiable parental consent or providing notice is not maintained in retrievable form by the Site if parental consent is not obtained after a reasonable time.
- 2.5 If you are a parent discovered that your child has submitted his or her personal information, we will take steps to delete the information as soon as possible, at your request. To request the removal of your child’s information, please contact us as described in paragraph 9 “Contact” of our Privacy Policy, and be sure to include in your message the same login information that your child submitted.
- 2.6 When you create an account on the Site, you may be able to post, upload, link to or otherwise make available material (collectively referred to as “User Content”). You are solely responsible for the content of, and any harm resulting from, any User Content that you post, upload, link to or otherwise make available via the Site, regardless of the form of that content.
- 2.7 Unless stated otherwise, our Privacy Policy applies to all information that we store/process about you. By you giving us your consent as part of completing and submitting the pre-screening questionnaire or any other forms or assessments, you consent to the collection, use, storage and processing of any of your personal information by eClinicalHealth as set out in our Privacy Policy; and to forwarding this information to the participating clinical site that has been selected.

3. Sharing your information

- 3.1 We may disclose your personal or sensitive data to third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed. These third parties can be:

- 3.1.1. clinical sites that will use your data in order to contact you in connection with a clinical study. Clinical sites are restricted by law from using personal data in any way other than providing services to you in the context of a clinical study; or
- 3.1.2. third parties who have contracted with us and will only process your personal data for the agreed purpose. These third parties will not sell or reuse your personal information, and will not disclose it except as may be required by law, as permitted by us or as stated in our Privacy Policy.

3.2 Personal data may be disclosed to a third party if we are required to do so because of applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceedings.

3.3 Certain eClinicalHealth employees may be able to have access to personal or sensitive data within the scope of their authority and if it is absolutely necessary to perform their tasks, and only if they have been given specific system permissions to access the data. eClinicalHealth enforces policies and procedures for our employees in their handling of personal data. All eClinicalHealth personnel are trained in privacy requirements and understand the need to protect your information.

4. Data Retention and Storage

4.1 We only retain your data for as long as is necessary for us to render a service you have requested or to which you have given your consent by acknowledging the acceptance of our Privacy Policy as part of completing and submitting the pre-screening questionnaire or any other forms or assessments, except where otherwise provided by law.

4.2 The database for storing data and its contents remains at eClinicalHealth and stays with data processors or servers acting on our behalf and responsible to us. Our database is located in the European Economic Area and is accessible only by eClinicalHealth.

5. How do we protect your data

5.1 eClinicalHealth will take reasonable efforts to protect your information, such as physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure or alteration. These measures include but are not limited to, technologies designed to safeguard through encryption the data in our database or the data in transit, assessment of our providers, security of encryption key and access controls. eClinicalHealth has procedures and policies in place and an Information Security and Data Privacy Officer to enforce them.

5.2 Our security policies are consistent with Good Clinical Practice (GCP) and Health Insurance Portability and Accountability Act (HIPAA) standards for the protection of any personally identifiable information we collect, transmit or store.

5.3 It is, however, your personal responsibility to take adequate security measures (e.g. secure web browser configuration, up-to-date antivirus software, personal firewall software) to protect the computer you are using and prevent access to your data by unauthorized third parties.

5.4 In case your data should be transferred to a country or territory outside the European Economic Area, eClinicalHealth will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with our Privacy Policy, applicable law and regulations.

6. Cookies

6.1 Cookies are essentially tokens of information sent to your browser from a website and may be stored on your computer's hard drive.

6.2 The Site requires session cookies. These are temporary cookies that remain only until you log out of the website or exit your web browser and do not store any personal information.

6.3 Some clinical studies built on the Clinpal™ platform may support patient recruitment through custom webpages that provide entry to the platform. Such custom pages may use third-party cookies to track the effectiveness of recruitment advertising campaigns. Such tracking is only employed prior to registering as a Clinpal™ user and patients are never tracked in this manner once they are actively participating in a clinical study as an identifiable individual.

7. Changes to privacy policy

7.1 eClinicalHealth recognises the importance of privacy to users of Clinpal. As technology and data privacy best practice are both developing, we reserve the right to make changes to this privacy policy from time to time. For example, if there is a change of law or if we are providing new services. These changes will take effect from the date the updated privacy policy is posted on the Site. We will notify you about these changes by updating this page, so we encourage you to check this page frequently. In addition, if the change affects the way we use or share your personal information, existing users will also be notified by email in sufficient time so that they can either consent that eClinicalHealth can continue to use their information or request the deletion of any or all of their personal data before the change comes into effect.

7.2 This policy was last updated 4th May 2018

8. Your rights

- 8.1 You have a right to access, rectify, restrict processing, update, correct or erase, if it is not otherwise required to be retained by law or for legitimate business purposes, your personal information. You have the right to portability in relation to personal data provided by you and may move, copy or transfer it for your own purposes to another controller. You have a right to withdraw your consent to processing of your personal information. You may exercise these rights at any time by contacting us as specified at the end of this policy.
- 8.2 You have a right to lodge a complaint with a supervisory authority. In the case we are unable to address your concerns or requests, you may refer them to the Information Commissioner's Office (ICO).

9. Contact

- 9.1 Comments, questions, concerns or requests regarding this policy and your rights are welcomed and can be submitted by email to privacy@clinpal.com or in writing to our registered address above.
- 9.2 Please address your correspondence to our Information Security and Data Privacy Officer and include the following information: your specific question or concern related to this policy; your contact information; and whether you would like us to contact you regarding your complaint. We will use commercially reasonable efforts to promptly determine and remedy your problem.