Global Privacy Policy

ResearchPoint Global ("RPG") is a full-service global Clinical Research Organization (CRO), providing contract clinical trial management services to the pharmaceutical, biotechnology and device industries. As such, RPG collects, hosts and analyzes significant quantities of health data relating to study subjects on behalf of our clients. Medical research involves the collection and analysis of clinical as well as other highly personal and confidential information. Individuals agree to share this sensitive information under the premise that anyone in receipt of the data will do so in an environment built upon a culture of trust, where safe data handling practices are employed by all. RPG is committed to handling information received about any individuals responsibly, with focus on individual privacy and in compliance with laws on data privacy and confidentiality.

This Privacy Policy ("Policy") summarizes the types of personal information we receive and analyze, our commitments to the individuals whose information we handle and how that information is used and disclosed. The Policy describes measures to ensure compliance with local and international data privacy laws, including but not limited to the U.S. Department of Commerce EU & Swiss Safe Harbor Framework for the transfer of personal information from the European Economic Area and Switzerland. RPG complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. RPG has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view RPG's certification, please visit http://www.export.gov/safeharbor/.

RPG has enacted internal policies and procedures designed to support compliance with these laws and this Policy. All employees must read and follow these policies and procedures which are reviewed, at a minimum, on a biennial basis and updated as needed.

Notice: Purposes of Collection of Personal Information

Clinical and Medical Information

All clinical and medical information processed by RPG is done so under contract with our clients. RPG considers the sponsor/client to be, ultimately in control of how and why clinical and medical data are processed within our services. To enhance privacy, consistent with GCP, subjects' names and other direct identifiers are not attached to records collected by RPG for research purposes. Only study doctors and authorized personnel, including RPG monitors and RPG auditors, may access named subject records at source. In certain cases where local law allows and subject safety dictates, RPG may also collect full date of birth as part of study records.

Health Professional Information

RPG evaluates and solicits doctors and other health care providers when seeking potential investigators to assist in clinical and medical research. RPG will use available contact information, including email addresses, for the purpose of inviting potential investigators to evaluate feasibility, assess protocols and/or participate in research. RPG maintains such information regarding health professionals within our own databases and may also source this information indirectly from public records, data brokers and referrals. RPG may also collect
information relating to the involvement and performance of investigators and supporting study staff for strictly operational purposes. RPG may also maintain limited financial information regarding investigators to facilitate payment for services and to collect financial disclosure information for our clients as part of the regulatory requirements for participation as an investigator in a clinical trial.

**Web Site Visitor Information**

RPG collects named information about visitors to company websites only when this is voluntarily provided to meet a request from those individuals. For example, a client contact requests information on RPG’s service, a health professional is interested in participating in a clinical trial or where someone wants to apply for a vacant position with the company. Through the use of automated technologies, RPG may collect various data linked to virtual identities allocated to visitors when they access our websites. This data is used for various purposes, including site analytics. In certain cases, these virtual identities are linked to the real world identities of visitors when they provide their named information as described above.

**Onward Transfer**

Personal information will be shared with companies working as agents of RPG and third parties, when necessary to meet stated legitimate business purposes, particularly with regard to clinical trial data, which is de-identified as described previously (see Clinical and Medical Information above). RPG does not trade or sell personal information. Under some circumstances, RPG may be required by law enforcement or judicial authorities to disclose certain personal information as part of investigations or for litigation purposes. RPG may disclose personal information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of RPG’s assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding.

RPG ensures data are safe with us and anyone who gets data from us with regard to onward transfer of data.

**Choice**

Consistent with GCP, laws on confidentiality and data privacy regulations, RPG will ensure, on behalf of its clients, that informed consents of study subjects are appropriately obtained. RPG will suggest template consent language to its clients, including necessary content as dictated by local law.

With regard to personal information collected from other individuals, where applicable, RPG will provide notice to individuals in a clear and conspicuous language about how their information will be used, disclosed and transferred; what choices they have in relation to how their data are handled; what informational rights they have under data privacy law or under this Policy; and who to contact with any questions or complaints. If documents are received that identify patient identity, the receiver of that information is required to redact the information as required by internal procedures. Such privacy notices are tailored to specific situations of data collection. In providing such notice, RPG meets its obligations to be transparent and fair with individuals as is required by many data privacy laws. In many situations, including where mandated by data privacy law, and also where it is a matter of good practice, RPG will seek consent of individuals.
to collect, use and disclose their data consistent with the relevant privacy notice. Also, RPG will use and disclose personal information without consent where required by law and judicial order.

Information Security

RPG maintains reasonable precautions, as defined by our SOPs, that protect personal information, particularly sensitive clinical data, against unauthorized access or loss. Consistent with regulatory requirements, particularly in the U.S., RPG also maintains a procedural response plan to deal with any breach of personal information, including making any necessary notifications to individuals or governmental authorities.

Data Quality and Record Retention

Crucial to the integrity of clinical research is the accuracy of data relating to study subjects. Consistent with regulatory requirements, RPG employs quality assurance professionals to ensure that we have adequate processes to address accuracy of clinical information. RPG retains personal information according to purpose and regulatory requirement, as directed by our corporate retention schedules.

Access

In jurisdictions with data privacy laws, and where Safe Harbor Framework commitments require, RPG ensures that individuals providing personal information directly to RPG can exercise all relevant informational rights with respect to their personal information, including but not limited to the right of access and correction, to prevent direct marketing, block processing and erase data. In all other respects, where no overriding interest prevails, RPG will endeavor to allow the following informational rights under this Policy as a matter of good practice:

- to allow access to copies of personal information within a reasonable timeframe;
- to correct personal information where inaccurate;
- to allow study investigators to opt out of future solicitations to participate in studies, by contacting Privacy Compliance Coordinator (privacy@researchpoint.com);
- to withdraw a previously provided consent to processing of personal information.

Study subjects must contact their investigator at the site with requests to make changes.

Enforcement

All communications, queries, requests to exercise informational rights (e.g., access to data) or complaints, including those that relate to compliance with the Safe Harbor Framework, should be addressed to the attention of the Privacy Compliance Coordinator (privacy@researchpoint.com).

As is required by the Safe Harbor Framework, RPG employs mechanisms that provide recourse to individuals and remedy any problems arising out of failure to comply with the Safe Harbor Principles by committing to cooperate with European data protection authorities. If a complaint
or dispute cannot be resolved through our internal process, we agree to dispute resolution using arbitration. More about the Safe Harbor Principles and RPG's obligations under the Safe Harbor Framework is available at the U.S. Department of Commerce’s Safe Harbor website at: http://export.gov/safeharbor/.
Legal Status of Policy and Policy Changes

Our Global Privacy Policy is not a contract, and it does not create any legal rights or obligations. This Policy may be amended from time to time consistent with the requirements of the Safe Harbor Principles. The updated Policy will be posted on http://www.researchpointglobal.com.

John V. Farinacci, President & CEO

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Date