



Policy: Global Privacy Policy

Document No.:	Version:	Effective Date:	Page:
WCG.POL.DP.001	10.3	02-Jan-2024	Page 1 of 22

1. PURPOSE

- 1.1 WCG Clinical, Inc. and its operating divisions, subsidiaries, affiliates, and branches (collectively, “WCG,” the “Company,” “we” or “us”) are sensitive to privacy issues, and it is important to us to protect the information provided to us. Accordingly, WCG provides this privacy and information practices policy to inform you about our online information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can correct or change such information (“Privacy Policy”).

2. SCOPE

- 2.1 This procedure begins when Protected Information is processed by WCG.
- 2.2 This procedure ends when the Protected Information is deleted by WCG.

3. POLICY

- 3.1 This Privacy Policy applies to Personal Information that is processed by WCG in the course of our business, including on Company websites (together with any and all future websites operated by or on behalf of WCG, the “Sites”). All individuals whose responsibilities include the Processing of Personal Information on behalf of WCG are expected to protect that data by adherence to this Privacy Policy.
- 3.2 WCG complies with the requirements of the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework, as set forth by the U.S. Department of Commerce. WCG has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. Data Privacy Framework and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. Data Privacy Framework. WCG has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. Data Privacy Framework. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. Data Privacy Framework Principles and/or the Swiss-U.S. Data Privacy Framework Principles, the Data Privacy Framework Principles shall govern. To learn more about the Data Privacy Framework program, and to view WCG’s certification, please visit <https://www.dataprivacyframework.gov/>. Additionally, WCG may protect your data through other legally- valid methods, including international data transfer agreements.
- 3.3 WCG complies with all privacy laws that are applicable to WCG business activities.
- 3.4 This Privacy Policy applies to all WCG operating divisions, subsidiaries, affiliates and branches, including its U.S. affiliates certified under the Data Privacy Framework, namely WCG IRB, LLC (“WCG IRB”), Research Dataware, LLC, d/b/a IRBNet (“IRBNet”), ePharmaSolutions, LLC (“ePS”), MedAvante-ProPhase, LLC (“MedAvante-ProPhase”), Global Safety Holdings, LLC d/b/a Vigilare International (“Vigilare”), Applied Clinical Intelligence, LLC (“ACI”), ThreeWire, LLC (“ThreeWire”), CenterWatch, LLC (“CenterWatch”), Washington Business Information, LLC d/b/a FDAnews (“FDAnews”), KMR Group, LLC (“KMR”), Velos, LLC (“Velos”), WCG Conferences, LLC (“WCG Conferences”), Analgesic Solutions, LLC (“Analgesic Solutions”), PharmaSeek, LLC (“PharmaSeek”), PharmaSeek Financial Services, LLC (“PFS Clinical”), PatientWise Creative, LLC (“PatientWise”), Statistics Collaborative, LLC (“Statistics Collaborative”), WCG Frankfurt GmbH (“WCG Frankfurt”), WCG Munchen GmbH (“WCG Munchen”), WCG K.K. (“WCG Japan”), Trifecta Multimedia, LLC d/b/a Trifecta Clinical (“Trifecta”), The Avoca



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 2 of 22

Group, LLC (“Avoca”), Intrinsic Imaging, LLC (“Intrinsic Imaging”), VeraSci, LLC (“VeraSci”) and any additional subsidiary, affiliate or branch of WCG that we may subsequently form.

3.5 Transparency/Notice—What Personal Information We Collect and How We Use It

3.5.1 The types of Personal Information we may collect (directly from you or from Third Party-sources) and our privacy practices depend on the nature of the relationship you have with WCG and the requirements of applicable law. We endeavor to collect information only relevant for the purposes of Processing. Below are the legal bases and some of the ways we collect information and how we use it.

3.5.2 Individuals

3.5.2.1 WCG collects Personal Information regarding its current, prospective and former clients, customers, visitors and guests (collectively “Individuals”). The data we collect from Individuals includes information such as title, name, division or place of employment, address, phone number, email address, username, answer to a security question and password, government identification (driver’s license, passport), and credit card and other financial information related to payments for services or goods. CenterWatch’s Patient Notification Service also collects date of birth, location, gender, and health condition. We may also collect your personal information related to health topics, products, or services in which you may have an interest. We may also collect demographic information you choose to provide, such as your business or company information, professional experiences, educational background, nationality, ethnic origin, age, gender, interests, preferences, and favorites.

3.5.2.2 We acquire, hold, use and Process Personal Information about Individuals for a variety of business purposes including to:

- 3.5.2.2.1 generally, manage Individual information and accounts;
- 3.5.2.2.2 respond to questions, comments, and requests;
- 3.5.2.2.3 provide access to certain areas and features of the WCG Sites;
- 3.5.2.2.4 ensure internal quality control;
- 3.5.2.2.5 verify Individual identity;
- 3.5.2.2.6 organize and enable Individuals to register for events or participate in webinars;
- 3.5.2.2.7 communicate about Individual account and activities on WCG’s Sites and systems, and, in WCG’s discretion, changes to any WCG policy;
- 3.5.2.2.8 tailor content, advertisements and offers we serve to Individuals;
- 3.5.2.2.9 process payment for products or services purchased;
- 3.5.2.2.10 manage clinical research and biospecimens;
- 3.5.2.2.11 measure interest in and improve WCG websites and systems;
- 3.5.2.2.12 develop new products, processes and services;
- 3.5.2.2.13. notify you about offers, products and services that may be of interest to you;
- 3.5.2.2.14. process applications and transactions;



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 3 of 22

- 3.5.2.2.15. prevent potentially prohibited or illegal activities;
- 3.5.2.2.16. provide services to you and our sponsors;
- 3.5.2.2.17. enforce our terms of use; and
- 3.5.2.2.18. for purposes disclosed at the time that Individuals provide Personal Information or otherwise with consent.

3.6 General Information Collected & Used by WCG

Depending on how you interact with WCG, we and our Third-Party service providers may also collect and use information in a variety of ways, including:

- 3.6.1 **Endpoint Adjudication and Data Monitoring Committees.** WCG provides endpoint adjudication and data monitoring committees and consulting services. In providing these services, WCG may collect and store demographic information of the patient (such as race, age, and gender) and Personal Information (business contact information, such as name, and phone number) of the health care providers and committee members.
- 3.6.2 **Endpoint Protection and Endpoint Adjudication Committees – Patient and Clinical Trial Data Collected.** As global providers of specialty solutions in clinical trials, WCG endeavors to optimize the detection, use, and analysis of clinical data points to mitigate trial risk and maximize the likelihood of study success. Through collaboration with sponsors, CROs and sites, we may collect or process information about clinical experts, regional clinical leads, reviewers, and patients. Examples include:
 - 3.6.2.1 **Qualitative Data Surveillance System – (“QDSS”).** QDSS, a proprietary solution, is a statistics and predictive, analytics-driven, central surveillance system for clinical trial monitoring, in a 21 CFR Part 11 compliant environment. Data collected may include coded data (such as treatment and assessment dates, patient initials and/or dates of birth) and/or other Personal Information of Data Subjects (such as patient gender, medical diagnosis, or other biographical information).
 - 3.6.2.2 **Training.** WCG’s training services include Accurate Pain Reporting (“APR”) training and Placebo Response Reduction (“PRR”) training, capturing patient and clinical trial-related data, potentially including similar coded data and Personal Information.
 - 3.6.2.3 **Misuse, Abuse, and Diversion Drug Event Reporting System (“MADDERS”).** WCG’s MADDERS provides standardized approaches to quantifying potential abuse in clinical trials, capturing patient and clinical trial-related data, potentially including similar coded data and Personal Information.
- 3.6.3 **Clinical Trial Listing Service.** On each clinical trial listing on CenterWatch’s website, you have the ability to connect with a participating study center by locating it on a map and clicking “Connect,” which presents a form that allows you to submit your contact information (a “referral”) to contacts at the study center you choose (or a representative thereof). All messages will indicate to the receiver that the transmission originated at CenterWatch.com. The company or individual you contact will only receive the information that you provide in the form including, e.g.,



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 4 of 22

- name, phone number, email address and any customized message. Sponsors and investigators will also be able to review this information and may contact you.
- 3.6.4 **CenterWatch – JobWatch User Information.** Registrants for JobWatch, a source for clinical research jobs and career resources offered by CenterWatch, must provide only their email address, which may be used by member companies to find qualified job applicants. CenterWatch has access to subscriber email addresses and utilizes them for troubleshooting and web- maintenance efforts. At times, CenterWatch may use this list to inform subscribers of a new service JobWatch is offering or a new product CenterWatch is introducing that may assist the registrant in his/her career search. If you receive updates that you do not wish to receive, please contact us at jobwatch@centerwatch.com.
- 3.6.5 **CenterWatch Patient Notification Service.** Upon submission of a referral for a clinical trial and while browsing Trial Listings on CenterWatch.com, you will be presented with the opportunity to sign up to be notified of clinical trial opportunities and related information of potential interest at <https://www.centerwatch.com/volunteers/registration/>. This allows WCG and its partners (where expressly provided consent by you) to contact you about clinical trials and related information.
- 3.6.6 **CenterWatch Research Center Profile Pages.** At the bottom of most Research Center Profile Pages, and Industry Provider Profiles Pages on CenterWatch's website, you will find a "submit template/form" to submit a confidential posting to the company or individual you are contacting. The message will not be received by any CenterWatch staff member. Furthermore, CenterWatch cannot access or retrieve any message that you submit using these forms; nor is CenterWatch responsible for any of these messages. However, all messages will indicate to the receiver that the transmission originated at CenterWatch.com. The company or individual you contact will only receive the information that you provide in the form including, e.g., name, address, phone number, email address, company (Industry Provider Profile Pages only) and any confidential message. To withhold information, simply leave the field blank.
- 3.6.7 **iConnect.**
- 3.6.7.1 iConnect is a patient recruitment service, which allows you to search for and initiate contact with clinical trials. All personal data you enter into a website powered by iConnect may be used by WCG and may also be shared with clinical research sites to contact you about clinical trials and related information.
- 3.6.7.2 To the extent Third Parties collect Personal Information of patients, WCG seeks to ensure that such Third Parties provide adequate privacy notices to the Data Subjects.
- 3.6.8 **Feasibility and Site Identification Services.** We use investigator data to help sponsors identify investigators to participate in future research.
- 3.6.9 **InvestigatorSpace.** InvestigatorSpace is a clinical trial portal that includes a safety letter distribution system. This allows sponsors to easily distribute IND Safety Reports and other safety information to investigators and other parties in compliance with legal requirements around the world. The subject data is pseudonymized in this service.
- 3.6.10 **FDAnews–Conference Details.**
- 3.6.10.1 **Registration.** Registrants for FDAnews-sponsored conferences must provide Personal Information including name, job title, company name, phone number, email address and mailing address and credit card and other financial information related to conference registration.



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 5 of 22

- 3.6.10.2 **Registration Lists.** FDAnews may provide requesting conference sponsors with a one-time marketing exception to contact registrants.
- 3.6.11 **FDAnews–Subscriber and Client Data Collected.** As a leading provider of domestic and international regulatory, legislative and business news and information for industries regulated by the U.S. Food and Drug Administration (“FDA”), FDAnews offers a variety of products and services, many of which may involve the collection and use of Personal Information from subscribers and clients. Examples include:
- 3.6.11.1 **Free eNewsletters.** FDAnews offers three free daily and weekly eNewsletters to subscribers. FDAnews has access to subscriber email addresses and utilizes them to send eNewsletters and other marketing material as well as for troubleshooting and web-maintenance efforts.
- 3.6.11.2 **Subscription eNewsletters, Books, Whitepapers and Webinars.** Personal Information from clients who purchase subscription eNewsletters, books, whitepapers and webinars may include name, job title, company name, phone number, mailing address and credit card and other financial information related to payments for services or goods. Payment and other Personal Information will be collected by service providers to complete your order and may be stored for purposes of future orders. FDAnews has access to subscriber and client email addresses and utilizes them to send eNewsletters and other marketing material as well as for troubleshooting and web-maintenance efforts.
- 3.6.12 **WCG Conferences – Subscriber, Speaker, and Client Data, and Conference Details.** WCG Conferences provides clinical research best practices information through its publication of a journal; directories of individuals involved in the clinical research industry; searchable databases of glossaries, answers and regulatory documents provided by the FDA; and webinars and annual conferences. Personal Information collected may include:
- 3.6.12.1 **Registration and Registration Lists.** Registrants for WCG Conferences-sponsored conferences and webinars will be asked to provide Personal Information as appropriate for the event, including name, job title, company name, phone number, email address, mailing address and credit card and other financial information related to conference registration. WCG Conferences may provide requesting conference sponsors with a one-time marketing exception to contact registrants.
- 3.6.12.2 **Speaker Information.** Individuals who are interested in speaking at a WCG Conferences-sponsored conference may be asked to provide Personal Information, including name, email address and password, educational and/or employment history and areas of interest.
- 3.6.12.3 **Subscription to Journal.** Personal Information from subscribers to the journal may include name, job title, company name, phone number and mailing address.
- 3.6.13 **IBCs – Institutional Biosafety Committee Members.** Our Institutional Biosafety Committees (“IBCs”) are dedicated to conducting a thorough biosafety review process utilizing expert board members who undergo regulatory training. From these board members, we may collect contact and biographical information, including name, address, email address, telephone number, date of birth, driver’s



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 6 of 22

license, Social Security number, financial information, and other employment-related information, including financial data related to credit checks, bank details for payroll, contact information of third parties in case of an emergency, and beneficiaries under any insurance policy, and professional and educational background and experience, such as information that may be recorded on a CV or application form such as language abilities.

- 3.6.14 **IRBs – Institutional Review Board Members.** Our Institutional Review Boards (“IRBs”) are dedicated to conducting a thorough review process, utilizing expert board members who undergo rigorous regulatory training. From these board members, we may collect contact and biographical information, including name, address, email address, telephone number, date of birth, driver’s license, Social Security number, financial information, and other employment-related information, including financial data related to credit checks, bank details for payroll, contact information of third parties in case of an emergency, and beneficiaries under any insurance policy, and professional and educational background and experience, such as information that may be recorded on a CV or application form such as language abilities.
- 3.6.15 **IRBs – Research Subject Information.** When research subjects communicate with our IRBs, we obtain whatever information the research subject chooses to provide (including, e.g., name and email address), and use that information to respond to the subject’s request. Additionally, our IRBs receive information from investigators regarding unanticipated problems. We endeavor to instruct investigators to provide such records in de-identified form.
- 3.6.16 **Clinical Benchmark Data.** As a global leader in the area of biopharmaceutical benchmarking in Research & Development (“R&D”) KMR, a WCG company, offers peerless data on topics ranging from discovery to project cost analysis, enrollment performance, and R&D productivity. Through our workbooks and interactions with our clients and users, we collect and store non-identifiable and aggregated trial and R&D data, as well as Personal Information (such as business contact information) about our clients.
- 3.6.17 **Clinical Endpoint Solutions – Patient and Clinical Trial Data Collected.** As global providers of endpoint solutions, WCG endeavors to optimize the selection, use, and analysis of behavioral and physical endpoints to mitigate trial risk and maximize the likelihood of study success. Through collaboration with sponsors, CROs and sites, we may collect or process information about clinical experts, regional clinical leads, reviewers, and patients. Examples include:
- 3.6.17.1 **Electronic Capture of Assessments – (“Pathway” and “Virgil”).** WCG’s proprietary solutions, Pathway and Virgil, use a variety of modalities (e.g., tablet, handheld devices, and handwritten notes) to capture clinical outcome data, including audio, video and observational data of patients and medical providers, in a 21 CFR Part 11 compliant environment. Data collected may include Protected Health Information (such as treatment and assessment dates, patient initials and/or dates of birth) and/or other Personal Information of Data Subjects (such as patient gender, medical diagnosis, or other biographical information).
- 3.6.17.2 **Independent Clinical Assessments.** WCG’s global clinicians perform remote clinical assessments, capturing patient and clinical trial-related data, potentially including similar Personal Information and/or Protected Health Information.



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 7 of 22

- 3.6.18 **Clinical Endpoint Solutions – Rater Services.** WCG also enhances clinical trial operations by offering rater services, including (i) rater certification, through which we offer documented participation in training programs, scale- specific scoring proficiency and applied skills training; and (ii) ratings quality assurance (audio/video monitoring) services, through which expert clinicians provide raters with feedback on their ongoing performance as well as review of endpoint data (e.g., diagnostic adjudication, patient selection, endpoint adjudication and quality monitoring). WCG will collect name and contact information from individuals participating in rater services. Additionally, these rater services may involve sensitive discussions between providers and patients, including potentially Personal Information. Importantly, WCG endeavors, when possible, to de-identify the videos by removing facial features.
- 3.6.19 **Study Start Up & Administration – Subject Recruitment and Research Site Marketing.** WCG assists parties to recruit research subjects through customized recruitment plans and supports clinical research sites with marketing materials for internal organizational and community outreach. In providing research study recruitment, WCG may collect and/or store Personal Information (such as name, phone number, email address and mailing address) and demographic information (such as age and gender), of the health care provider. In providing marketing materials for internal organizational and community outreach, WCG may collect and store the Personal Information (business contact information, such as name, and phone number) of the health care provider.
- 3.6.20 **Study Start Up & Administration – Research Institution Support.** WCG provides consulting and administrative services to research institutions, including coverage analysis, budget development, contract redline, negotiations, financial management, training, study identification, site performance assessments and research executive support. In providing consulting on billing and claims review, which involve a patient’s medical record, and when performing study build/data entry services into institutions’ clinical trial management systems (“CTMS”), and for financial management services, WCG may access Personal Information (such as name, phone number, email address and mailing address) and demographic information (such as race, age and gender), and may collect and/or store Protected Health Information (such as patient name or initials, medical record number, health insurance type and company), and demographic information (such as birthdate), as well as the Personal Information (business contact information, such as name and phone number) of the health care provider.
- 3.6.21 **Study Start Up & Administration – Clinical Research Site and Sponsor Support.** WCG provides consulting and administrative support to clinical research sites, sponsors, and sponsors’ contract research organizations (“CROs”), including site identification, protocol savings analysis, study identification, site performance assessments, contract and budget services, accounts receivable service, study build/data entry into sites’ CTMS, coverage analysis, training and regulatory document review and completion. In providing study build/data entry services into sites’ CTMS and accounts receivable services, WCG may access, collect and/or store Protected Health Information (such as patient initials and study subject identifier number), as well as the Personal Information (business contact information, such as name and phone number) of the health care provider.
- 3.6.22 **Statistical Consulting.** WCG provides statistical services to medical drug and device companies. These services include statistical consulting, study design, regulatory and strategic consulting, data monitoring committee support, statistical programming and meta-analysis. WCG may also process coded research subject



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 8 of 22

- information (such as treatment and assessment dates, patient initials, dates of birth, gender, medical diagnoses or other biographical information).
- 3.6.23 **Patient Recruitment, Enrolment and Retention Services.** WCG provides clinical trial recruitment and direct-to-patient marketing services to help pharmaceutical, medical device and biotech companies achieve their patient recruitment, enrollment, and retention goals. Through onsite clinical trial recruitment efforts conducted with healthcare facilities and direct-to-patient marketing campaigns, WCG accesses and stores relevant patient Personal Information to (i) assess the suitability of potential patients for clinical trials or physician services; (ii) contact, schedule and/or enroll pre-qualified patient referrals with study sites; and (iii) other related recruitment, enrollment, and retention services. The patient Personal Information collected and utilized may include name, phone number, email address, mailing address, diagnosis, and other contact information. WCG also collects contact Personal Information (e.g., name, email address, phone number and/or other) of staff members of the healthcare facilities with whom they work and of trials sites for which patients are being recruited.
- 3.6.24 **InvestigatorSpace® Training.** WCG provides online training and communication tools to physicians conducting clinical trials. Through its platform, WCG supports investigator training, safety letter distribution and regulatory document management. Personal Information may be collected for the purpose of entering clients into WCG systems, providing access to the WCG online training and communication tool, or to otherwise provide our services.
- 3.6.25 **Clinical Trial Management System**
- 3.6.25.1 **eResearch.** WCG eResearch provides a comprehensive 21 CFR part 11 compliant clinical research management suite to help manage all administrative, financial and research activities by, among other things, linking study status, patient enrollment, calendars, budgets and electronic data capture, which may include Personal Information about study doctors, site personnel, and other individuals involved in the administration and overview of studies and may also include Protected Health Information about study participants.
- 3.6.25.2 **eCompliance.** WCG eCompliance supports all aspects of the review process for clinical trials and facilitates centralized management of studies, including through supporting the establishment of new protocols, management of the IRB approval process, protocol review committees and pre-review, which may include Personal Information about study doctors, site personnel and other individuals involved in the review process.
- 3.6.25.3 **eSample.** WCG eSample offers complete biospecimen management to support specimen acquisition, sample annotation and tracking, storage administration, protocol and patient linking and a multi-site specimen network to enhance data quality and facilitate clinical translational research. This may include Protected Health Information and/or other Personal Information about study participants and Personal Information about personnel involved with specimen collection, management and analysis.
- 3.6.26 **Avoca.** Avoca, a WCG company, tailors solutions that help companies build industry-leading quality management, inspection readiness, and effective oversight systems into existing processes. Through our interactions with our clients and



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 9 of 22

users, we collect and store non-identifiable and aggregated trial and R&D data, as well as Personal Information (such as business contact information) about our clients.

- 3.6.27 **WCG Frankfurt.** WCG Frankfurt provides clinical trial recruitment and direct-to-patient marketing services to help pharmaceutical, medical device and biotech companies achieve their patient recruitment, enrollment, and retention goals. Through onsite clinical trial recruitment efforts conducted with healthcare facilities and direct-to-patient marketing campaigns, WCG Frankfurt accesses and stores relevant patient Personal Information to (i) assess the suitability of potential patients for clinical trials or physician services; (ii) contact, schedule and/or enroll pre-qualified patient referrals with study sites; and (iii) other related recruitment, enrollment, and retention services. The patient Personal Information processed may include name, phone number, email address, mailing address, diagnosis, and other contact information. WCG Frankfurt also collects contact Personal Information (e.g., name, email address, phone number and/or other contact information) of staff members of the healthcare facilities with whom such staff members work and of trials sites for which patients are being recruited.
- 3.6.28 **Imaging Core Lab Services.** WCG provides medical imaging core lab services. We provide comprehensive services in support of Phase I-IV clinical trials and Class I, II, III medical device trials. Through our interactions with our clients, we may collect and store non-identifiable medical imaging core lab data, as well as business related personally identifiable information (PII), such as business contact information, about our clients and select imaging centers.
- 3.6.29 **WCG Japan – Patient and Clinical Trial Data Collected.** As global providers of specialty solutions in clinical trials, WCG Japan endeavors to optimize the selection, use and analysis of behavioral and physical endpoints to mitigate trial risk and maximize the likelihood of study success. Through collaboration with sponsors, CROs and sites, we may collect or Process information about clinical experts, regional clinical leads, reviewers, and patients. Examples include:
- 3.6.29.1 **Electronic Capture of Assessments – (“Pathway” and “Virgil”).** WCG Japan’s proprietary solutions, Pathway and Virgil, use a variety of modalities (e.g., tablet, handheld devices, and handwritten notes) to capture clinical outcome data, including audio, video, and observational data, in a 21 CFR Part 11 compliant environment. Data collected may include Protected Health Information (such as treatment and assessment dates, patient initials and/or dates of birth) and/or other Personal Information of Data Subjects (such as patient gender, medical diagnosis, or other biographical information).
- 3.6.29.2 **Independent Clinical Assessments.** WCG Japan’s global clinicians perform remote clinical assessments, capturing patient and clinical trial-related data, potentially including similar Personal Information and/or Protected Health Information.
- 3.6.30 **WCG Japan – Rater Services.** WCG Japan also enhances clinical trial operations by offering rater services, including (i) rater certification, through which we offer documented participation in training programs, scale-specific scoring proficiency and applied skills training; and (ii) ratings quality assurance (audio/video monitoring) services, through which expert clinicians provide raters with feedback on their ongoing performance as well as review of endpoint data (e.g., diagnostic adjudication, patient selection, endpoint adjudication and quality monitoring). These rater services may involve sensitive discussions between providers and patients, including potentially Personal Information. Importantly,



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 10 of 22

WCG Japan endeavors, when possible, to de-identify the videos by removing facial features.

3.6.31 **WCG Munchen – Patient and Clinical Trial Data Collected.** As global providers of specialty solutions in clinical trials, WCG Munchen endeavors to optimize the selection, use and analysis of behavioral and physical endpoints to mitigate trial risk and maximize the likelihood of study success. Through collaboration with sponsors, CROs and sites, we may collect or Process information about clinical experts, regional clinical leads, reviewers, and patients. Examples include:

3.6.31.1 **Electronic Capture of Assessments – (“Pathway” and “Virgil”).** WCG Munchen’s proprietary solutions, Pathway and Virgil, use a variety of modalities (e.g., tablet, handheld devices, and handwritten notes) to capture clinical outcome data, including audio, video and observational data, in a 21 CFR Part 11 compliant environment. Data collected may include Protected Health Information (such as treatment and assessment dates, patient initials and/or dates of birth) and/or other Personal Information of Data Subjects (such as patient gender, medical diagnosis, or other biographical information).

3.6.31.2 **Independent Clinical Assessments.** WCG Munchen’s global clinicians perform remote clinical assessments, capturing patient and clinical trial-related data, potentially including similar Personal Information and/or Protected Health Information.

3.6.32 **WCG Munchen – Rater Services.** WCG Munchen also enhances clinical trial operations by offering rater services, including (i) rater certification, through which we offer documented participation in training programs, scale-specific scoring proficiency and applied skills training; and (ii) ratings quality assurance (audio/video monitoring) services, through which expert clinicians provide raters with feedback on their ongoing performance as well as review of endpoint data (e.g., diagnostic adjudication, patient selection, endpoint adjudication and quality monitoring). These rater services may involve sensitive discussions between providers and patients, including potentially Personal Information. Importantly, WCG Munchen endeavors, when possible, to de-identify the videos by removing facial features.

3.6.33 **WCG – Pseudonymous Data.** Including as discussed below, WCG may use and share your anonymized or aggregated information within the WCG family of companies or with Third Parties for public health, research, analytics, and any other legally permissible purposes.

3.7 Information We Collect Automatically

3.7.1 We may collect certain information automatically through our services or other methods of web analysis, such as your Internet Protocol (IP) address, cookie identifiers, mobile advertising identifiers and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type, operating system, Internet service provider, pages that you visit before and after using the services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the services and other actions taken through use of the services.

3.8 Other Ways WCG May Use Personal Data

3.8.1 We acquire, hold, use, and Process Personal Information based on the legal grounds and for the legitimate business purposes outlined in this Privacy Policy, including:



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 11 of 22

3.8.2 **To Provide Products, Services, or Information Requested.** WCG may use information about you to fulfill requests for services or information, including information about potential or future services, including to:

- 3.8.2.1 Generally, manage Individual information and accounts;
- 3.8.2.2 Respond to questions, comments, and other requests;
- 3.8.2.3 Provide access to certain areas, functionalities, and features of WCG's services;
- 3.8.2.4 Verify or maintain the quality or safety of a service;
- 3.8.2.5 Allow you to register for events.

3.8.3 **Administrative Purposes.** WCG may use Personal Information about you for its administrative purposes, including to:

- 3.8.3.1 Measure interest in WCG's services and short term, transient use;
- 3.8.3.2 Develop new products and services;
- 3.8.3.3 Ensure internal quality control;
- 3.8.3.4 Debug to identify and repair errors that impair existing intended functionality;
- 3.8.3.5 Verify Individual identity;
- 3.8.3.6 Communicate about Individual accounts and activities on WCG's services and systems, and, in WCG's discretion, changes to any WCG policy;
- 3.8.3.7 Process payment for products or services purchased;
- 3.8.3.8 Process applications and transactions;
- 3.8.3.9 Comply with regulatory requirements;
- 3.8.3.10 Perform audits relating to interactions, transactions, and other compliance activities;
- 3.8.3.11 Prevent potentially prohibited or illegal activities;
- 3.8.3.12 Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity and prosecute those responsible for that activity;
- 3.8.3.13 Enforce our terms of service.

3.8.4 **Marketing WCG Services.** WCG may use Personal Information to provide you with materials about offers, products, and services that may be of interest, including new content or services. WCG may provide you with these materials by phone, postal mail, facsimile or email, as permitted by applicable law. Such uses include:

- 3.8.4.1 To tailor content, advertisements and offers;
- 3.8.4.2 To notify you about offers, products, and services that may be of interest to you;
- 3.8.4.3 To provide services to you and our sponsors;
- 3.8.4.4 For other purposes disclosed at the time that Individuals provide Personal Information;
- 3.8.4.5 Otherwise with your consent. You may contact us at any time to opt out of the use of your Personal Information for marketing purposes, as further described below.

3.8.5 **Research and Development.** WCG may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources in order to help us to optimally deliver our existing products and services or develop new products and services.



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 12 of 22

- 3.8.6 **Information Submitted Via Services.** You agree that WCG is free to use the content of any communications submitted by you via the services, including any ideas, inventions, concepts, techniques, or know-how disclosed therein, for any purpose including developing, manufacturing and/or marketing goods or services.
- 3.8.7 **Information De-Identified or Aggregated.** Including as discussed below, WCG may use and share de-identified or aggregated information within the WCG group of companies or with Third Parties for public health, research, analytics, or any other legally permissible purpose.
- 3.8.8 **Regulatory Purposes.** WCG may use Personal Information to comply with regulatory or legal requirements (on our behalf or on behalf of a WCG customer), including to investigate, track and/or report on adverse effects experienced.
- 3.8.9 **Other Uses.** WCG may use Personal Information for other purposes disclosed to you at the time you provide Personal Information or with your consent.
- 3.9 **Human Resources Data.** WCG collects Personal Information from current, prospective, and former Employees, their contact points in case of a medical emergency and beneficiaries under any insurance policy (“Human Resources Data”). The Human Resources Data we collect may include title, name, address, phone number, email address, date of birth, passport number, driver’s license number, Social Security number, financial information related to credit checks, bank details for payroll, information that may be recorded on a CV or application form, language abilities, contact information of third parties in case of an emergency and beneficiaries under any insurance policy. We may also collect sensitive human resources data such as details of health and disability, including mental health, medical leave, and maternity leave.

We acquire, hold, use and Process Human Resources-related Personal Information for a variety of business purposes including:

- 3.9.1 Workflow management, assigning, managing, and administering projects;
- 3.9.2 Human Resources administration and communication;
- 3.9.3 Payroll and the provision of benefits;
- 3.9.4 Compensation, including bonuses and long-term incentive administration, stock plan administration, compensation analysis, including monitoring overtime and compliance with labor laws, and company recognition programs;
- 3.9.5 Job grading activities;
- 3.9.6 Performance and Employee development management;
- 3.9.7 Organizational development and succession planning;
- 3.9.8 Benefits and personnel administration;
- 3.9.9 Absence management;
- 3.9.10 Helpdesk and IT support services;
- 3.9.11 Regulatory compliance;
- 3.9.12 Internal and/or external or governmental compliance investigations;
- 3.9.13 Internal or external audits;
- 3.9.14 Litigation evaluation, prosecution, and defense;
- 3.9.15 Diversity and inclusion initiatives;
- 3.9.16 Restructuring and relocation;
- 3.9.17 Emergency contacts and services;
- 3.9.18 Employee safety, including monitoring compliance with safety regulations by confirming Employees are not speeding or otherwise violating traffic laws;
- 3.9.19 Compliance with statutory requirements; monitoring use of WCG equipment, facilities, accounts, information, technology systems and networks;
- 3.9.20 Processing of Employee expenses and travel charges; or
- 3.9.21 Acquisitions, divestitures, and integrations.



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 13 of 22

- 3.10 **Social Media and Interest-Based Advertising.** Generally, online social media resources are interactive tools that enable Data Subjects to collaborate and share information with others. Social media resources include, but are not limited to, social networks, discussion boards, bulletin boards, blogs, wikis, and referral functions to share web site content and tools with a friend or colleague. WCG may collect Personal Information to enable Data Subjects to use online social media resources. We may also enable you to use these social media resources to post or share Personal Information with others. If you use an online social media resource offered by a third party (“Third Party SMR”) through WCG, you acknowledge that WCG may be able to access any information you make public through such Third Party SMR (such as your username, comments, posts, and contacts) and other information your privacy settings on such Third Party SMR permit WCG to access.
- When using social media resources, you should take into careful consideration what Personal Information you share with others. WCG will comply with the terms of this Privacy Policy and the privacy policies applicable to the social media resources it uses. Through our Sites, WCG may in the future allow Third Party advertising partners to set tracking tools (e.g., cookies) to collect anonymous, non-Personal Information regarding your activities (e.g., your IP address, page(s) visited, time of day). We may also share such information we have collected with Third Party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering future targeted advertisements to you when you visit non-WCG related websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising.”
- 3.11 **Information from Third Party Sources.** WCG may collect information about you from Third Party sources to supplement information provided by you. This supplemental information allows us to verify information that you have provided to WCG and to enhance our ability to provide you with information about our business, products, and services. WCG may also collect information from Third Party sources or in the course of providing services to a WCG customer. WCG’s agreements with these Third-Party sources and/or relevant customer typically limit how the Company may use this information.
- 3.12 **Direct Mail, Email and Outbound Telemarketing.** Individuals who provide us with Personal Information, or whose Personal Information we obtain from Third Parties, may receive periodic emails, newsletters, mailings, or phone calls from us with information on WCG or our business partners’ products and services or upcoming special offers/events we believe may be of interest. We offer the option to decline these communications at no cost to the Individual by following the instructions below in “*Onward Transfer.*”
- 3.13 **Research/Survey Solicitations.** From time to time, WCG may perform research (online and offline) via surveys. We may engage Third Party service providers to conduct such surveys on our behalf. All survey responses are voluntary, and the information collected will be used for research and reporting purposes to help us better serve Individuals by learning more about their needs and the quality of the products and services we provide. The survey responses may be utilized to determine the effectiveness of our Sites, various types of communications, advertising campaigns and/or promotional activities. If an Individual participates in a survey, the information given will be used along with that of other study participants. We may share de-identified individual and aggregate data for research and analysis purposes.
- 3.14 **Biometric Information.** If you consent to our collection of biometric information or if our collection of biometric information is otherwise permitted, you agree that we may collect your voice and video recordings for our rater services and electronic capture of assessments as described above. Your biometric information may be shared with service providers, business partners, or affiliates. We will delete your biometric information as required by applicable law



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 14 of 22

or contractual obligation, but otherwise will hold it until our business partners no longer need the information to support the submission for approval of the medical product.

3.15 All Internet Users – Cookies, Pixel Tags, Web Beacons, and Aggregate Information.

3.15.1 **Cookies.** Like many other websites, WCG or its business partners may employ a cookie, or small piece of computer code that enables Web servers to “identify” visitors, each time an Individual initiates a session on the Company’s Sites. A cookie is set in order to identify Data Subjects; tailor our Sites to you; measure and research the effectiveness of our Sites’ features, offerings, and advertisements; and authenticate users for registered services. Cookies can only access Personal Information that you have provided on our Sites and cannot be accessed by other sites. We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Sites, and to develop website content. This analytics data is not tied to any Personal Information. At any time, visitors may choose to opt-out of Google Analytics tracking with the Google Analytics opt-out browser add-on found at www.tools.google.com/dlpage/gaoptout. Data Subjects also have the ability to delete cookie files from their own hard drive at any time by clicking on the “Privacy” or “History” tab typically found on the “Settings” or “Options” menu in your internet browser. However, please also be advised that cookies may be necessary to provide access to much of the content and many of the features of WCG’s Sites.

3.15.2 **Pixel Tags/Web Beacons.** WCG may use “pixel tags,” also known as “web beacons,” which are small graphic files that allow us to monitor the use of our Sites. A pixel tag can collect information such as the Internet Protocol (“IP”) address of the computer that downloaded the page on which the tag appears; the URL of the page on which the pixel tag appears; the time the page containing the pixel tag was viewed; the browser type and language; the device type; geographic location; and the identification number of any cookie on the computer previously placed by that server. When corresponding with you via HTML capable email, we or our Third-Party service providers may use “format sensing” technology, which allows pixel tags to let us know whether you received and opened our email.

3.15.3 **De-identified and Aggregated Information.** De-identified and aggregated information is used for a variety of functions, including the measurement of visitors’ interest in and use of various portions or features of the Sites. De-identified or aggregated information is not Personal Information, and WCG may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within WCG and with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

3.16 **Mobile Computing.** WCG may provide websites and online resources that are specifically designed to be compatible and used on mobile computing devices. Mobile versions of WCG’s Sites may require that users log in with an account. In such cases, information about use of each mobile version of the website may be associated with user accounts. In addition, WCG may enable Individuals to download an application, widget or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit Personal Information to WCG to enable Data Subjects to access user accounts and to enable WCG to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. WCG may use personal or non-identifiable information transmitted to the Company to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices WCG provides.



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 15 of 22

3.17 **Choice/Modalities to Opt-Out.** You have the right to opt out of certain uses and disclosures of your Personal Information, as set out in this Privacy Policy.

3.17.1 **General.** Where you have consented to WCG's Processing of your Personal Information or Sensitive Personal Information, you may withdraw that consent at any time and opt out by following the instructions provided to you at the time the Personal Information was collected from you, or as otherwise instructed by WCG, or as described below. Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will provide information regarding the new purpose and give you the opportunity to opt out. Prior to disclosing Sensitive Data to a Third Party or Processing Sensitive Data for a purpose other than its original purpose or the purpose authorized subsequently by the Data Subject, WCG will endeavor to obtain each Data Subject's explicit consent (opt-in). Where consent of the Data Subject for the Processing of Personal Information is otherwise required by law or contract, WCG will comply with the law or contract.

3.17.2 **Email and Telephone Communications.** An "Unsubscribe" button will be provided at the top or bottom of each email communications sent by WCG so that you can opt-out. However, we will continue to send transaction-related emails regarding products or services you have requested.

Additionally, those registered for CenterWatch's Patient Notification Service who no longer wish to receive updates may contact customerservice@centerwatch.com or follow the unsubscribe instructions at <http://www.centerwatch.com/clinical-trials/pns/>.

We maintain telephone "do not call" lists and "do not mail" lists as mandated by law. We process requests to be placed on do not mail, do not phone and do not contact lists within 60 days after receipt, or such shorter time as may be required by law.

3.17.3 **Human Resources Data.** With regard to Personal Information that WCG receives in connection with the employment relationship, WCG will use such Personal Information only for employment-related purposes as more fully described above. If WCG intends to use this Personal Information for any other purpose, the Company will provide the Data Subject with an opportunity to opt-out of such uses.

3.17.4 **"Do Not Track."** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. WCG does not recognize or respond to browser-initiated DNT signals.

3.17.5 **Advertising Choices.** While WCG does not currently participate in interest-based advertising, it may in the future use your browsing for interest-based advertising purposes. In the event that we do so, an opportunity to opt-out of such interest-based advertising will be provided through an AdChoices link. Even if you opt-out through this service, we may still collect non-Personal Information regarding your activities on our Sites and use it for non-interest-based advertising purposes as described in this Privacy Policy.

Advertisements on Third Party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on anonymous,



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 16 of 22

non-Personal Information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt-out of the advertising partners' use of this information for interest-based advertising purposes. Even if you opt-out through this service, we may still collect and use information from the advertisements for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements.

- 3.17.6 **Compliance with the Digital Advertising Alliance.** Should WCG engage in interest-based advertising, it will endeavor to comply with the cross-industry Self-Regulatory Program for Online Behavioral Advertising as managed by the Digital Advertising Alliance ("DAA") (<http://aboutads.info>). As part of this service, WCG's online advertisements may sometimes be delivered with icons that help Individuals understand how their data are being used and provide choice options to Individuals that want more control. The list of our advertising partners may be updated from time to time. To opt-out of internet-based advertising by all DAA-participating companies, please visit <http://www.aboutads.info/choices/>. Please note, you must separately opt out in each browser and on each device.

3.18 Onward Transfer.

- 3.18.1 **Information We Share.** WCG does not sell or otherwise disclose Personal Information about you, except as described in this Privacy Policy or as you explicitly consent.

- 3.18.1.1 WCG may share Personal Information with our service providers, consultants, sponsors, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. Payment information will be used and shared only to effectuate your order and may be stored by a service provider for purposes of future orders. WCG may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with WCG's. WCG encourages you to review the privacy policy of our business partners before submitting your Personal Information. WCG requires our service providers, sponsors, and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which WCG retained them or in the case of sponsors, for which they retained WCG. With respect to onward transfers to Agents under Data Privacy Framework, Data Privacy Framework requires that WCG remain liable should its Agents Process Personal Information in a manner inconsistent with the Data Privacy Framework Principles.
- 3.18.1.2 We may disclose information about you: (i) if we are required to do so by law, court order or legal process; (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; (iii) under the discovery process in litigation; (iv) to enforce WCG policies or contracts; (v) to collect amounts owed to WCG; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) in the good faith believe that disclosure is



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 17 of 22

otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Sites. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

3.18.1.3 We reserve the right to disclose or transfer any information we have about you in the event of a proposed or actual purchase, any reorganization, sale, lease, merger, joint venture, assignment, amalgamation or any other type of acquisition, disposal or financing of all or any portion of our business or of any of the business assets or shares (including in connection with any bankruptcy or similar proceeding). Should such an event occur, WCG will endeavor to direct the transferee to use Personal Information in a manner that is consistent with this Privacy Policy.

3.18.1.4 Data Transfers. All Personal Information sent or collected via or by WCG may be stored anywhere in the world, including but not limited to, in the United States, in the cloud, our servers, the servers of our affiliates or the servers of our service providers. By providing information to WCG, you consent to the storage of your Personal Information in these locations. We endeavor to safeguard your information consistent with the requirements of applicable laws.

3.19 **Rights of Access, Rectification, Portability, Erasure and Restriction.** Under Data Privacy Framework, unless otherwise restricted by law, you may seek confirmation regarding whether WCG is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend, or delete your Personal Information where it is inaccurate or has been Processed in violation of the Data Privacy Framework Principles. Where otherwise permitted by applicable law, you may use any of the methods set out above in Section 3.17 “Choice/Modalities to Opt-Out” - of this Privacy Policy to request access to, receive (port), restrict (or object to) Processing, seek rectification or request erasure of Personal Information held about you by WCG or withdraw your consent to the Processing of your Personal Information. Such requests will be Processed in line with local laws. Although WCG makes good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which WCG is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others’ privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual’s privacy in the case in question or where it is commercially proprietary. If WCG determines that access should be restricted in any instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, WCG will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

3.20 **Retention.** WCG retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Sites or as necessary to fulfill the purpose(s) for which it was collected, provide our products and services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

3.21 **Security.** The security of all Personal Information provided to WCG is important to us, and WCG takes reasonable steps designed to protect your Personal Information. Unfortunately, no data transmission over the Internet or storage of information can be guaranteed to be 100% secure. As a result, while WCG strives to protect your Personal Information, we cannot ensure or warrant the security of any information you transmit to WCG, and you do



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 18 of 22

so at your own risk. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy and administrative issues relating to your use of our services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our services, by mail or by sending an email to you.

3.22 Other Rights and Important Information.

3.22.1 Information Regarding Children. Due to the nature of WCG's business, services and benefits are not marketed to minors. WCG does not knowingly solicit or collect Personal Information from children under the age of 13. If we learn that we have collected Personal Information from a child under the age of 13 without appropriate parental consent, we will promptly delete that information.

3.22.2 Supplemental Notice for California Residents.

This Supplemental Notice for California Residents only applies to our Processing of Personal Information that is subject to the California Consumer Privacy Act of 2018 ("CCPA"). The CCPA provides California residents with the right to know what categories of Personal Information WCG has collected about them and whether WCG disclosed that Personal Information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected by WCG	Category of Third Parties Information is Disclosed to for a Business Purpose
<p>Identifiers A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number (from Employees – see next category) or other similar identifiers.</p>	<p>Affiliates Service Providers Business Partners</p>



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 19 of 22

<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information or health insurance information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state or local government records. Note: Some Personal Information included in this category may overlap with other categories.</p>	Affiliates Service Providers Business Partners
<p>Protected classification characteristics under California or federal law Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	Affiliates Service Providers Business Partners
<p>Biometric information Video and voice recordings.</p>	Affiliates Service Providers Business Partners
<p>Internet or other electronic network activity Browsing history, search history, information on a consumer's interaction with an internet website, application or advertisement.</p>	Affiliates Service Providers Business Partners
<p>Sensory data Audio, electronic, visual, thermal, olfactory or similar information.</p>	Affiliates Service Providers Business Partners
<p>Professional or employment-related information Current or past job history or performance evaluations.</p>	Affiliates Service Providers Business Partners

The categories of sources from which we collect Personal Information and our business and commercial purposes for using Personal Information are set forth above.



Policy: Global Privacy Policy		
Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 20 of 22

3.22.2.1 “Sales” of Personal Information under the CCPA

California residents have the right to opt out of the “sale” of their Personal Information. Under the CCPA, “sale” is defined broadly and includes the transfer of Personal Information by a business to a third party for valuable consideration (even if there is no exchange of money). CenterWatch may “sell” Personal Information.

The categories of Personal Information we have “sold” and the categories of Third Parties we have “sold” Personal Information to in the preceding twelve months are listed below:

Category of Personal Information Collected by CenterWatch	Category of Third Parties Personal Information is Sold to
Identifiers A real name or email address.	<ul style="list-style-type: none"> • Business Partners • Customers

CenterWatch’s business and commercial purposes for “selling” Personal Information can be found above in Section 3.6 “General Information Collected & Used by WCG.” CenterWatch and WCG do not have actual knowledge of any “sale” of Personal Information of minors under 16 years of age.

3.22.2.2 Opt-Out of “Sales.” California residents may opt-out of the “sale” of their Personal Information by contacting us as set forth below.

3.22.2.3 Additional Privacy Rights for California Residents.

3.22.2.3.1 Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

3.22.2.3.2 Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us as set forth below.

3.22.2.3.3 Verification. To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative, which may include your name, phone number, email address or other contact information.

3.22.2.3.4 If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth below. We will process such requests in accordance with applicable laws.



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 21 of 22

- 3.22.3 **Accessibility.** This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium's Web Content Accessibility Guidelines, Version 2.1. If you wish to print this policy, please do so from your web browser or by saving the page as a PDF.
- 3.22.3.1 **California Shine the Light.** California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the Third Parties to whom we have disclosed their Personal Information (if any) for Third Party direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those parties. WCG does not share Personal Information with Third Parties for its own marketing purposes.
- 3.22.3.2 **Supplemental Notice for Nevada Residents.** If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to license or sell that Personal Information. You can exercise this right by contacting us at privacy@wcgclinical.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A.
- 3.22.4 **Links to Third Party Websites.** Please note that our Sites may contain links to other websites for your convenience and information. WCG does not control Third Party websites or their privacy practices, which may differ from those set out in this Privacy Policy. WCG does not endorse or make any representations about Third Party websites. Any Personal Information you choose to give to unrelated Third Parties is not covered by this Privacy Policy. WCG encourages you to review the privacy policy of any company or website before submitting your Personal Information. Some Third Parties may choose to share their users' Personal Information with WCG; that sharing is governed by that company's privacy policy, not this Privacy Policy.
- 3.22.5 **Changes to the Privacy Policy.** WCG may update this Privacy Policy from time to time as it deems necessary in its sole discretion. If there are any material changes to this Privacy Policy, WCG will notify you by email or as otherwise required by applicable law. WCG encourages you to review this Privacy Policy periodically to be informed regarding how WCG is using and protecting your information and to be aware of any policy changes. Your continued relationship with WCG after the posting or notice of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. Any changes to this Privacy Policy take effect immediately after being posted or otherwise provided by WCG.
- 3.22.6 **Compliance.** This Privacy Policy shall be implemented by WCG and all its operating divisions, subsidiaries, and affiliates. WCG has put in place mechanisms to verify ongoing compliance with Data Privacy Framework Principles and this Privacy Policy. Any Employee that violates these privacy principles will be subject to disciplinary procedures.
- 3.22.7 **Redress / Compliance and Accountability.**

If after reviewing this Privacy Policy, you would like to submit a request or you have any questions or privacy concerns, please contact:



Policy: Global Privacy Policy

Document No.:	Version:	Page:
WCG.POL.DP.001	10.3	Page 22 of 22

WCG Clinical, Inc.
Attn: David Forster, Chief Compliance Officer
212 Carnegie Center, Suite 301
Princeton, NJ 08540
Phone: +1 (360) 252-2428
Email: privacy@wcgclinical.com

WCG will address your concerns and attempt to resolve any privacy issues in a timely manner. If you are a EU, UK, or Swiss citizen and feel that WCG is not abiding by the terms of this Privacy Policy or is not in compliance with the Data Privacy Framework Principles, please contact WCG at the contact information provided above. In addition, WCG has agreed to refer unresolved complaints related to Personal Information to JAMS Data Privacy Framework Dispute Resolution Program at no cost to you and, with respect to Employee and human resources data, has committed to cooperate with the panels established by EU local data protection authorities, the Swiss Federal Data Protection and Information Commissioner (FDPIC), and UK Information Commissioner's Office. For more information and to submit a complaint regarding Personal Information to JAMS, a dispute resolution provider which has locations in the United States and EU, visit <https://www.jamsadr.com/eu-us-data-privacy-framework>. Such independent dispute resolution mechanisms are available to citizens free of charge. If any request remains unresolved, you may contact the appropriate data protection authorities listed above. You may also have a right, under certain conditions, to invoke binding arbitration under Data Privacy Framework; for additional information, see <https://www.dataprivacyframework.gov/s/article/G-Arbitration-Procedures-dpf> The Federal Trade Commission ("FTC") has jurisdiction over WCG's compliance with the Data Privacy Framework.

4. ROLES AND RESPONSIBILITIES

4.1 WCG Employees are responsible for complying with this Privacy Policy.

5. DEFINITIONS

5.1 Refer to WCG.FOR.QA.301 WCG Glossary for applicable definitions.

6. REFERENCES

- 6.1 EU-U.S. Data Privacy Framework
- 6.2 Swiss-U.S. Data Privacy Framework
- 6.3 WCG.FOR.QA.301 WCG Glossary