

Data Privacy Framework Statement

Effective 11 July 2023

This Data Privacy Framework Statement (“Statement”) has been produced by Worldwide Clinical Trials Holdings, Inc., its subsidiaries and affiliates (“Worldwide”) in connection with the transfer and protection of personal data received from data subjects located in the European Economic Area (EEA), Switzerland, and the United Kingdom (UK). Worldwide is located at 600 Park Offices Dr #200, Research Triangle Park, Durham NC 27709.

For the purposes of this Statement, “personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

To participate in the DPF program, Worldwide must publicly commit to comply with the DPF Principles. While the decision to self-certify to and participate in the DPF program is voluntary, effective compliance upon self-certification is compulsory. Once such an organization self-certifies to the ITA and publicly declares its commitment to adhere to the DPF Principles that commitment is enforceable under U.S. law. If there is any conflict between the terms in this Statement and the DPF Principles, the Principles shall govern.

To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/s/>.

Scope

Worldwide provides global clinical trial services on behalf of clinical trial sponsors. In connection with providing these services to its customers, Worldwide processes personal data from individuals located in the EEA, UK, and Switzerland. This Statement applies to the collection, use, storage, transfer, and disclosure of personal data transferred from the EU, the UK, or Switzerland to Worldwide in the United States (“US”). Data subjects may include (i) clinical trial participants; (ii) clinical trial site staff; (iii) internet end users of Worldwide’s own websites and applications; or (iii) business contact information associated with our business customers and business partners such as vendors. Worldwide also adheres to the principles of the DPF with regard to the processing of its own employees’ and contractors’ personal data in its role as an employer.

Application of Data Privacy Framework Principles

Notice	<p>We will inform data subjects of our privacy practices, including the purposes for which we collect and use their personal data, the people or categories of people who will have access to it, and the choices and means, if any, they have for limiting the use and disclosure of your personal data.</p> <p>When we are processing personal data as a data processor (for example, as a CRO on behalf of client or sponsor), we will only use personal data according to the privacy notices and instructions issued by those entities who determine the purpose and means of the processing.</p>
Choice	<p>When required or permitted by applicable law, we obtain consent before the collection, use or disclosure of personal data. To the extent we can under applicable law, we will respect the choices and requests of data subjects to limit the collection, use, transfer or other processing of their personal data.</p> <p>In EEA member states which prohibit us from relying on consent for the processing of clinical trial participant data, we will rely on an alternative legal basis permitted under EU or Member State law. Clinical trial participants will at all times be provided with complete and transparent information related to the processing of their personal data during the informed consent process prior to participation in the clinical trial.</p> <p>If we are processing personal data based on consent, the data subject has the right to withdraw their consent at any time and no additional personal data will be.</p> <p>We may be able to retain and continue to use certain personal data under specific circumstances, such as to demonstrate the safety or efficacy of the investigational drug in a clinical trial, for legal or regulatory purposes, to defend ourselves in a legal claim, or for other reasons permitted under applicable data privacy laws.</p>
Accountability for onward transfers	<p>We will only carry out international transfers of personal data within or outside of our group of affiliated companies and agents, when the recipient is located in a country that is the recipient of an adequacy decision, or when we have implemented adequate safeguards and reasonable privacy controls for such information in compliance with applicable laws.</p> <p>Worldwide does not sell or share personal data with third parties except as described in our Global Privacy Policy.</p> <p>We may be required under applicable law to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.</p>

<p>Oversight of agents and service providers</p>	<p>We may transfer personal data to our third-party agents or service providers who perform functions on our behalf. We take reasonable and appropriate steps, including execution of written contracts, to require third-party agents and service providers to only process personal data in accordance with applicable law and the principles contained in this Statement and our Global Privacy Policy. We will provide a summary or representative copy of relevant privacy provisions of our contracts with a third party upon request.</p>
<p>Security, confidentiality, and data integrity</p>	<p>We implement appropriate administrative, physical, and technical safeguards to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We evaluate any potential security incident or personal data breach, and report any unauthorized disclosure of personal data as required by and in accordance with applicable laws.</p> <p>We will ensure that personal data is kept accurate, complete and relevant for its intended use. We will take all reasonable steps to destroy or amend inaccurate or out-of-date personal data.</p> <p>When we are processing personal data on behalf of a data controller (for example, as a CRO on behalf of client or sponsor), we will act according to the instructions of and contractual terms in place with the data controller to support the data controller’s obligations under the Data Use, Integrity & Retention principle.</p>
<p>Data minimization</p>	<p>We will only collect and process personal data that is relevant and necessary to fulfill the purpose for which it was collected.</p>
<p>Storage limitation</p>	<p>We will retain personal data only as long as necessary or required to fulfil the purpose of the collection. Clinical trial participant data will be retained according to applicable clinical trial regulations, which may as long as 25 years in some jurisdictions.</p> <p>When we process personal data on behalf of a data controller (for example, as a CRO on behalf of client or sponsor), we will act according to the instructions of and contractual terms in place with the data controller to support the data controller’s obligations under the Purpose Limitation principle.</p>
<p>Recourse, enforcement and liability</p>	<p>Worldwide has established internal mechanisms to verify its ongoing adherence to this Statement. Worldwide is subject to the investigatory and enforcement powers of the US federal government, including the Federal Trade Commission (FTC). Worldwide also encourages individuals covered by this Statement to raise any concerns about our processing of their personal data by contacting Worldwide’s Data Protection Officer at the address below. Worldwide will seek to resolve any concerns within thirty (30) days according to our internal SOPs.</p>

	<p>Worldwide commits to cooperate with the panel established by the EEA data protection authorities (DPAs) and to comply with the advice given by the panel with regard to data transferred from the EEA. For personal data relating to Swiss individuals, Worldwide commits to cooperate with the Swiss Federal Data Protection and Information Commissioner (FDCIP) and to comply with the advice given by the FDCIP with regard to Swiss individual information transferred.</p> <p>Worldwide commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and complies with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.</p> <p>Worldwide commits to periodically reviewing and verifying the accuracy of this Statement and its compliance with the Principles, and remedying any issues identified. All employees of Worldwide that have access to personal data covered by this Statement in the US are responsible for conducting themselves in accordance with this Statement and with Worldwide policies and procedures. Failure of an employee to comply with Worldwide policies related to personal data may result in disciplinary action up to and including termination.</p> <p>Adherence to these Privacy Principles may be limited to the extent required to meet a legal, governmental, national security or public interest obligation.</p>
<p>Complaints, Dispute Resolution, Data Subject Requests, and Limiting the Use and Disclosure of Personal Data:</p>	<p>In compliance with DPF Principles, Worldwide commits to resolve complaints about our collection or use of your personal data within thirty (30) days, to respond to requests made by individuals to access or to limit the use and disclosure of their personal data.</p> <p>Worldwide has chosen a panel of EU DPAs to serve as the Independent Recourse Mechanism for any complaints.</p> <p>To issue a complaint, make a request to access your personal data or to limit the use and disclosure of your personal data, or for any other questions or concerns, please contact Worldwide’s Data Protection Officer at DPO@worldwide.com.</p>

You may contact us at any time using any of the following methods:

- **Mail:** 600 Park Offices Dr #200, Research Triangle, NC 27709
- **Telephone (toll-free):** 1 (855) 524 3133
- **Data Protection Officer: Rosemarie Corrigan** DPO@worldwide.com
- **General privacy and data protection inquiries:** Data.Protection@worldwide.com
- **[Worldwide's Data Representative in the European Union:](#)** WCT Clinical Research Spain, S.L.U, Calle Príncipe De Vergara, 112 4^ª. 28002, Madrid, Spain

If you are currently a participant in a clinical trial who wants to exercise any of your rights under the applicable privacy laws, please reach out to the study doctor or the clinical trial site coordinator (as detailed further in the Informed Consent Form for your study).