

LabConnect Privacy Notice

Last Updated: January 23, 2022

LabConnect, Inc. (“**LabConnect**,” “**we**,” “**our**,” and “**us**”) is committed to protecting privacy and maintaining trust with our business clients (“**Clients**”), and others who use or interact with our website (collectively, “**End Users**”). This Privacy Notice (“**Notice**”) describes how we collect and use Personal Information (defined below) across our website – <https://www.labconnect.com/> (the “**Site**”), and as part of our services (“**Services**”). This Notice does not apply to Personal Information we collect offline, or to our collection of applicant and employee Personal Information, all of which may be governed by separate privacy policies.

If you are a California resident, please see important additional information contained in Section 10 of this notice.

Note: If you are a patient in a clinical study, please note that we do not collect or use any identifying information about patients. You should contact the study investigator, or other person mentioned in the study documents, with questions or requests about your Personal Information. If you are a healthcare professional participating in a study, your Personal Information may be managed by the sponsor or CRO, and you should direct your questions or requests about your Personal Information to the sponsor or CRO.

Table of Contents

1. Information We Collect.....	1
2. How We Use Information	2
3. How We Disclose Information	3
4. Our Use of Cookies	3
5. Information Regarding Children	4
6. Legal Disclaimers.....	4
7. Links	4
8. Updates to This Notice	4
9. Contact Us.....	5
10. Additional Information for California Residents.....	5
11. Additional Information for Individuals Located in the EEA and UK.....	8

1. Information We Collect

We collect information that identifies, describes, or is reasonably capable of being associated with an identified or identifiable individual (“**Personal Information**”). The following describes the types of Personal Information we collect.

Personal Information We Collect Directly From End Users

The Personal Information we collect through our Site includes:

- **Contact Information.** E.g., first and last name, job title, company name/employer, email, phone number, state, country, and referral source.
- **Message Contents.** E.g., message contents and any other information End Users may choose to provide.
- **Software Access.** Should a client representative request access to one of our systems and is granted, we collect name and email address of these individuals in order to grant secure, limited-access to their trial data.

Personal Information Collected Passively or Automatically

We may automatically collect the following Personal Information from or about End Users who visit our Site:

- **Device Identifiers.** E.g., IP address, unique device identifiers, operating system, and other information related to the device used to interact with our Clients via our Site and Services.
- **Network and Activity Information.** E.g., referring and exit web pages and URLs, browsing history, and other similar information. As described below in the “**Our Use of Cookies**” section, we may use analytics providers and technologies, including cookies and similar tools, to collect this information.
- **Location Information.** We may collect or derive location information about you, such as through your IP address.

To the extent permitted by applicable law, we may combine this information with other information we collect.

2. How We Use Information

We may use the Personal Information we collect for the following purposes:

- **Provide and Manage our Services,** including scheduling meetings, communication, and customer service.
- **Operate Our Business,** and to otherwise run our day-to-day operations.
- **Conduct Surveys,** such as customer satisfaction surveys and market surveys.
- **Planning and Managing Events.**
- **Augment Existing Information,** including to obtain additional information from our vendors or other third parties.
- **Evaluate and Improve Our Site and Services.**
- **Security Purposes,** including to mitigate fraud, investigate and prevent illegal activities, protect LabConnect, and protect or enforce our rights and those of others.
- **Legal Requirements,** including to comply with lawful court orders, law enforcement requests, or other legal requirements

- **Other Operational Purposes**, including for purposes not provided for in this Notice, but if we do, we will notify the End User (and, if necessary, obtain consent) before using the Personal Information in that way.

3. How We Disclose Information

We may disclose End Users' Personal Information to the following parties:

- **Service Providers**, vendors, contractors, or agents who perform functions on our behalf.
- **Client and Business Partners** as necessary to deliver our Services.
- **Affiliates and Subsidiaries**.

We also may disclose End User Personal Information in the following circumstances:

- **At an End User's Request.**
- **To Complete Business Transactions**, such as an acquisition, merger, or share or asset sale.
- **In Response to Legal Process**, such as a judicial proceeding, court order, or other legal process.
- **To Protect Us and Others from Fraud or other Illegal Activities, or Violations of our Terms or Policies.**
- **With an End User's Permission.**

4. Our Use of Cookies

We use cookies, tags, and similar tracking technologies ("**Cookies**") on our Site to provide, customize, evaluate, and improve our services. These include our own first-party Cookies as well as third-party Cookies of our service providers and partners. We use both temporary (session) and persistent cookies.

How We Use Cookies

We use Cookies for the following purposes:

- **Performance, Analytics, and Site Improvement.**
- **Targeted Advertising**, including to provide you with more relevant ads and content, and to evaluate the success of such ads and content.

How to Manage Cookies

You can set your browser to block certain cookies or notify you when a cookie is set. You can also delete cookies. The "Help" portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to delete cookies. Visitors to our Sites who disable cookies will be able to browse the Sites, but some features may not function.

You can also control how participating third-party ad companies use the information that they collect about your visits to our websites and use of our mobile applications, and those of third parties, in order to display more relevant targeted advertising to you. If you are in the U.S., you can obtain more information and opt out of receiving targeted ads from participating third-party ad networks at aboutads.info/choices (Digital Advertising Alliance).

You may also download the DAA AppChoices tool in order to help control interest-based advertising on apps on your mobile device: <https://youradchoices.com/appchoices>

We are not responsible for the completeness, effectiveness, or accuracy of any third-party opt-out options or programs.

5. Information Regarding Children

We do not knowingly collect Personal Information from End Users under the age of eighteen (18) without parental consent. If we become aware that we have collected information from a child under 13 years old without parental consent, we will delete such information from our records. If you are a parent or legal guardian and believe your child has given us information and you did not provide consent, please contact using the information provided in the “**Contact Us**” section below.

6. Legal Disclaimers

Nothing in this Notice restricts our ability to:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local law;
- Exercise or defend legal claims;
- Detect security incidents and protect against fraudulent or illegal activity and prosecute those responsible for such activity; or
- Transfer Personal Information as part of a merger or acquisition, dissolution, bankruptcy, or any other transaction in which a third party assumes control of all or part of our business.

7. Links

Our Site may contain links to unaffiliated websites. We are not responsible for the information practices of such websites.

8. Updates to This Notice

This Notice is current as of the last updated date given above. We may change this Notice from time to time. Where we make changes to this Notice that materially impact the use of Personal Information, we will attempt to notify End Users, such as via email or by placing a notice on our homepage.

9. Contact Us

If you have questions, please contact us at:

Email: DPO@labconnect.com

10. Additional Information for California Residents

This section of our Notice provides additional information about how we handle Personal Information of California residents, as required under the California Consumer Privacy Act 2018, as amended by the California Privacy Rights Act 2020 (the “CCPA”). In general, this section applies to employees of our Clients and vendors who reside in California as well as any visitors to our Site from California. This section does not address or apply to our handling of personal information that is exempt under the CCPA (this may include certain clinical study data, and protected health information subject to the Health Insurance Portability and Accountability Act (“HIPAA”).

Categories of Data We Collect, Disclose, and Sell

- **Identifiers:** such as a real name, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address.
- **Internet or other electronic network activity information:** such as browsing history, clickstream data, search history, and information regarding a resident’s interaction with an internet website, application, or advertisement.
- **Audio, electronic, visual, or similar information:** such as call recordings when you call our customer service line, and video footage for security purposes when you visit our facilities.
- **Inferences** drawn from any of the above categories.

We disclose all the above categories for business or commercial purposes, as defined under the CCPA.

Sensitive Personal Information

While we may collect sensitive Personal Information (e.g., health data and genetic data) from certain individuals, we do so solely as part of our Services and on our Clients’ instructions. We do not use sensitive Personal Information for any purpose other than to provide Services to our Clients.

How We Use Personal Information

When we collect Personal Information from our business partners, such as Client and vendor personnel, we may use that Personal Information for the following business or commercial purposes (and any directly related purposes):

- for billing, collections, and payment purposes;
- for security and safety when you visit our facilities;
- to manage our technology resources (e.g., cyber-risk management, infrastructure management and business continuity);
- to detect and prevent fraud;
- to protect and defend our rights or property, or the rights and property of others;
- to perform corporate governance, training, and other internal functions;
- for archiving and record-keeping;
- in the event of corporate transactions such as a financing, merger, acquisition, takeover, amalgamation or other disposal of assets or interests;
- to investigate, enforce, and apply this Notice and to otherwise protect our own rights and interests, such as to resolve any disputes or to respond to legal process; and
- to comply with the law, when certain information is necessary to satisfy our legal or regulatory obligations and to respond to lawful requests, court orders, and legal process.

For employees of our **Clients**, we process this Personal Information for the following additional purposes:

- to provide you our Services, process your transactions, and fulfill your orders.
- to maintain your account and otherwise run our day-to-day operations.
- to conduct business with you, including to perform our contractual obligations to your employer or principal;
- to provide you and your employer with marketing materials about products, services, news, offers, promotions and events which we think may be of interest to you;
- to communicate with you and your employer, including to fulfill requests and orders, answer questions and other requests from you, provide customer support, and communicate with you and your employer about business opportunities or conduct surveys and research;
- to operate and expand our business activities and evaluate, develop, and improve the quality of our products and services;

For our **vendors**, we process this Personal Information for the following additional purposes:

- to manage our contracts with your employer or principal and receive products or services;
- to ensure we are receiving products or services appropriately and on terms most beneficial to us;
- for vendor management purposes, including vendor risk management;

Sources of Personal Information

We generally collect Personal Information from the following categories of sources:

- Directly or indirectly from you;
- Our affiliates and subsidiaries;

- Our business partners;
- Customers and Clients;
- Internet service providers;
- Operating systems and platforms; and
- Our vendors and service providers.

Retention of Personal Information

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this Notice, or otherwise disclosed to you at the time of collection.

Deidentification Of Personal Information

Where LabConnect has committed to maintaining and using Personal Information in a deidentified form, LabConnect agrees not to reidentify deidentified data except as permitted by applicable law.

Additional Rights Regarding Personal Information

We provide our Services to our Clients, which generally are clinical study sponsors and contract research organizations (CRO) that manage clinical studies on behalf of sponsors. If you are a patient in a clinical study, please note that we do not collect or use any identifying information about patients. You should contact the study investigator, or other person mentioned in the study documents, with questions or requests about your Personal Information. If you are a healthcare professional participating in a study, your Personal Information may be managed by the sponsor or CRO, and you should direct your questions or requests about your Personal Information to the sponsor or CRO.

Where LabConnect collects End User Personal Information for its own purposes (and not for a Client, as explained above), End Users may have the right to request the following:

- **Request Access** to, and a copy of, Personal Information we have collected.
- **Right to Correct** inaccurate Personal Information.
- **Right to Delete** Personal Information.
- **Right to Opt-Out of Sale/Sharing of Personal Information.** You have the right to opt-out of “sales” and “sharing” of your personal information, as those terms are defined under the CCPA. While we do not “sell” personal information in the traditional sense (i.e., for money), our use of third-party analytics and advertising cookies may be considered “selling” and “sharing” under CCPA. To exercise your right to opt-out of the “sale” or “sharing” of your personal information, please use the opt-out mechanism provided on our site.
- **Right to Limit the Use and Disclosure of Sensitive Personal Information.** While we may collect sensitive Personal Information on behalf of our Clients, we do not collect any sensitive Personal Information from End Users, and therefore do not engage in uses of this type of information that would trigger this right under the CCPA.
- **Right to Non-Discrimination.** We will not discriminate against you in terms of price or service level for exercising any rights described in this Notice.

Verification. Before we comply with your request, we may need to verify your identity. Please provide us with your name, the email address with which you have communicated with us in the past, and, if applicable, the name of the Client of vendor on whose behalf you interacted with us.

You may exercise your rights by contacting us at DPO@labconnect.com.

“Shine the Light” Law

We do not disclose your personal information to third parties for the third parties’ own direct marketing purposes

Do Not Track

Currently, the Site does not recognize “Do-Not-Track” requests but will recognize universal opt-out signals as required under the CCPA.

11. Additional Information for Individuals Located in the EEA and UK

This section of our Notice provides additional information about how we handle Personal Information of individuals located in the European Economic Area (“EEA”) or United Kingdom (“UK”). In general, this section applies to employees of our Clients and vendors who are located in the EEA or UK, as well as any visitors to our Site from the EEA or UK.

Legal Bases for Processing

We rely on one of several different legal bases to process your Personal Information, as follows:

1. **Necessary for Performance of a Contract.** We use Personal Information to take steps necessary to perform our obligations with our Clients, or to ensure our vendors perform their obligations to us.
2. **For our Legitimate Interests.** We use Personal Information to further our legitimate interests in protecting the security and safety of our personnel, our Clients and vendors, and their personnel.
3. **Based on Compliance with EEA/UK Law.** We use Personal Information to comply with legal obligations to which we are subject.

Based on Consent. Where we have obtained it, we use Personal Information with End Users’ consent.

Additional Rights Regarding Personal Information

EEA and UK law provides individuals located in those regions with specific rights regarding Personal Information, subject to conditions set out in the law. These rights are:

- **Request Access/Portability.** The right to request access to, and a copy of, Personal Information we have collected. You also can request that we transfer your Personal Information to a third party.
- **Right to Correct** inaccurate Personal Information.

- **Right to Delete** Personal Information.
- **Right to Withdraw Consent** for processing of your Personal Information going forward, where we rely on your consent as the legal basis.
- **Right to Restrict Use of Personal Information** under certain circumstances.
- **Right to Object** to our continued use of your Personal Information in certain circumstances. You have the absolute right to object to our processing of your Personal Information for direct marketing purposes.
- **Right to Lodge a Complaint** with a supervisory authority in your country of residence.

Verification. Before we comply with your request, we may need to verify your identity, and we may need to request additional information to verify your identity.

You may exercise your rights by contacting us at DPO@labconnect.com. You may lodge a complaint directly with the relevant supervisory authority.

Transfer of Personal Data

We transfer your personal data to the United States. When transferring personal data to entities located in a country outside the EEA or UK that is not deemed to have an adequate level of data protection, we take measures to provide adequate protection for your personal data. We enter into data processing agreements and data transfer agreements that include standard contractual clauses approved by the European Commission or the UK Information Commissioner's Office. Where required, we conduct transfer risk assessments and put in place supplementary measures to protect any personal data we transfer outside the EEA or UK to countries that do not have an adequate level of data protection.