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## Privacy Policy

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At ICON Clinical Research Limited (hereinafter "**ICON**"), we are committed to protecting your privacy. You can visit most pages on our site without giving us any information about yourself. But sometimes we do need additional information about you in order to provide the information or services you are requesting and this Privacy Statement explains data collection and use in those situations. Please read the complete Privacy Policy.

Where the information provided to ICON is that of your minor child, who cannot legally provide consent to the processing of their personal data, the pronouns, "you" and "your," should be read as referring to the minor child rather than to the legal representative/Guardian who is providing the minor child's information to ICON.

### Collection of your Personal Information

This applies to all information collected or submitted on this website. We will ask you when we need information that personally identifies you ("**personal information**", "**personal information data**", or "**data**" as used herein) or allows us to contact you. Personal information collected by ICON is often limited to e-mail address, language, country, or location, but may include other information when needed to provide a requested service, where an opportunity to participate in a research study or clinical trial is being processed, or where services as an investigator in a clinical trial are being offered. We collect information in several ways, outlined below:

**1. On some pages**, you can register to receive information on an automated basis. The type of information you can register to receive in this manner include general information relating to research studies or clinical trials being offered by ICON, our affiliates, or our clients.

The personal information collected when you register to receive information on an automated basis is your e-mail address. You will have the option of cancelling your registration and removing your e-mail from the database on each occasion that you receive an automated e-mail alert, by clicking on an unsubscribe link on each e-mail alert message.

**2. On some pages**, you may choose to provide personal information about yourself if you are interested in potentially participating in a research study or clinical trial. In each case, the information requested will be dependent upon the area of interest being pursued.

**3. On some pages**, you may choose to register to receive access to digital media, periodic updates, or information on specific research studies. Generally, the personal information collected in such cases is your name and e-mail address. This information is collected for qualification and aggregate measurement purposes only.

**4. On some pages**, you can register to receive customized information. This information is generally collected on "Contact Us" forms where you may choose to be contacted by ICON. The personal information collected in these cases include your name, contact details, and e-mail address as voluntarily submitted by yourself.

**5. ICON** also collects certain information about your computer hardware and software. This information may include: your IP address, browser type, operating system, domain name, access times, and referring website addresses. This information is used for the operation of the service, to maintain and monitor quality of the service, and to provide general statistics regarding use of the website.

### **Use of your Personal Information**

We may use your personal information for the following purposes:

- To ensure this service is relevant to your needs
- To deliver services and information about ICON that you request
- To assist ICON in creating and publishing content most relevant to you
- To alert you to updated information about ICON and ICON services if you so request
- To allow you access to limited-entry areas of this website as appropriate

ICON respects the privacy rights and interests of its website visitors and the following principles will be applied by ICON when dealing with personal information data:

### **Data Privacy Principles**

ICON respects the privacy rights and interests of visitors to this website and the following principles will be applied by ICON when dealing with your Personal Data. Personal Data shall be: :

- i. Processed lawfully, fairly and in a transparent manner;
- ii. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with the purposes;
- iii. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- iv. Accurate, and where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- v. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- vi. Processed in a manner than ensured appropriate security of the Personal Data including protection against accidental loss, destruction or damage, using appropriate technical or organisation measures

We store the information you provide in a secure electronic database in order to provide you with the information and/or services you request. Information provided will not be kept longer than is necessary for the purposes for which it is being processed or to meet relevant regulatory requirements.

### **Processing of Personal Information**

This policy was last updated on 30 April 2019

This site and the electronic database have security measures in place to protect the loss, misuse, unauthorized access, disclosure, alteration, or destruction of the information under our control.

By submitting your personal information, you agree that ICON may process it for the purposes and in accordance with the principles outlined herein.

ICON processes personal information data fairly and lawfully for the purposes as outlined herein only.

Processing for these purposes includes collecting, recording, organizing, structuring, storage, adapting or altering retrieving, consulting, using, disclosing by transmission, dissemination or otherwise making available, aligning or combining, restricting, erasing or destroying data. In the case of processing interest in participating in research studies or clinical trials with ICON, processing of data may include, but is not limited, to:

- The capture of responses to the pre-screening questionnaire that will be used for:
  - Recruiting suitable candidates for research studies or clinical trials
  - Analysis of the ongoing recruitment for the research studies or clinical trials
  - Providing the ability to supply study information to recruited candidates for research studies or clinical trials
  - Analysis of the failure rates and patterns for research studies or clinical trials
  - The capture of contact information (name, e-mail address, and phone number that will be used for enabling an investigator contact the candidate

This list is not exhaustive and may be changed and/or added to from time to time.

### **Disclosure Within**

To operate as a global business, it may be necessary to process and transfer personal information data within ICON businesses. This may involve transferring personal information data outside the European Economic Area (EEA) to the USA and elsewhere.

Processing and/or transfer of personal information data and release of such information within ICON and/or to third parties outside the European Economic Area is subject to local law and, where required, will be subject to your consent, as well as ensuring adequate security measures.

### **Disclosure to Third Parties**

ICON may be obliged to disclose certain personal information data to third parties such as Government Authorities.

It may be necessary to disclose certain personal information data to a supplier or contractor organization supplying services that require the use and/or creation of personal information data.

It may also be necessary to disclose personal information data so as to protect the legal interests and other rights of ICON, subject to local legal requirements.

### **Data Security**

ICON has security in place to protect manual and electronic processing of personal information data and prevent its misuse, subject to local legal requirements.

ICON also ensures adequate security is observed by third parties and affiliates processing personal information data on behalf of ICON, subject to local legal requirements.

### **Sensitive Personal Data**

ICON ensures special protection for sensitive personal data. This is defined by ICON as:

- Demographic data (e.g., sex, race, color, ethnic or national origin, religion, philosophical or political beliefs, trade union membership, and criminal proceedings); and
- Medical data (e.g., pre-placement medicals, and other medical documents produced for the purposes of employment such as drug screen results)
- ICON may process this type of data subject to your explicit consent required for the processing of sensitive personal data.

### **Exceptions**

Except as described herein, we will not otherwise use or disclose any of your personal information, except to the extent reasonably necessary:

1. To correct technical errors and to technically process your personal information
2. To protect the security and integrity of this service
3. To protect any ICON property or rights or obligations and/or the property, rights, or obligations of third parties where ICON may have an obligation or liability in respect of these
4. To take precautions against potential liability on the part of ICON
5. To any extent required by law, applicable regulation, or judicial process
6. To any extent permitted under any other applicable legal or regulatory provisions to provide information to law enforcement agencies or to provide information in respect of a matter related to public safety

### **Your Rights**

Subject to applicable legislation, you may have the right to access your personal information, have any errors in your information corrected or to object to the processing of your personal information. In certain circumstances, you may also have the right to have your personal

information “ported” to you or to another party or to have your information erased from our systems. You can exercise these rights by directing a written request to **ICON Clinical Research Limited, South County Business Park, Dublin 18, D18 X5R3** or by sending an email to **Data\_Privacy\_Officer@iconplc.com**. Where we rely on consent to the continued processing of your personal information, you may withdraw your consent at any time by sending a request as stated above.

You are encouraged to ensure that personal information data is kept up to date and amend any such data that is inaccurate or out of date (e.g., name and address).

If you disagree with the accuracy or completeness of any personal information data, please notify ICON in accordance with "Contact Information" below; ICON will endeavor to resolve any issues concerning your personal information data in accordance with relevant procedures.

If you are a data subject covered by the GDPR and you are of the opinion that ICON has infringed your rights under the GDPR you have the right to lodge a complaint with the appropriate Data Protection Supervisory Authority in your Member State. ICON’s lead Data Protection Supervisory Authority is the Data Protection Commission in Ireland (**[www.dataprotection.ie](http://www.dataprotection.ie)**)

### **Protection of Children's Personal Information**

This is a general audience site and no part of the site is structured to attract children. It is ICON's view that the nature of the subject matter is unlikely to be of general interest to children but notwithstanding this, ICON does not knowingly collect any personal information from children.

### **Notification of Changes**

As this service and ICON evolve and as privacy laws and regulations change, it may be necessary to revise or update our Privacy Policy. When we do, we will also revise the "last updated" date at the bottom of the Privacy Policy.

### **Contact Information**

Questions or comments related to this policy should be submitted to the ICON Global Data Protection Officer as follows: **ICON Clinical Research Limited, South County Business Park, Dublin 18, D18 X5R3** or by sending an email to **Data\_Privacy\_Officer@iconplc.com**.