

## PRIVACY POLICY FOR THE SHARED INVESTIGATOR PLATFORM AND THE INVESTIGATOR REGISTRY

The pharmaceutical and biotechnology companies that conduct clinical trials using the Shared Investigator Platform and/or the Investigator Registry (collectively, “Sponsors”) are committed to respecting and protecting the privacy of Investigators and site personnel (“Site Users”). A full list of Sponsors is available in Section 10 of this Privacy Policy. This Privacy Policy explains:

- [What the SIP and IR do](#)
- [What information Sponsors might collect about Site Users and how Sponsors might use that information](#)
- [What information Sponsors might share with others](#)
- [When Sponsors might use information to contact a Site User](#)
- [Where information is stored](#)
- [Site User choices about the Personal Information they provide](#)
- [How Sponsors use cookies and how a Site User can manage them](#)
- [How Sponsors protect Site User data](#)
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The Policy also includes a required [CCPA notice](#) for users residing in California.

### 1. What the SIP and IR Do

The Shared Investigator Platform (“SIP”) and the Investigator Registry (“IR”) were both developed by a consortium of biopharmaceutical companies that conduct clinical trials to increase efficiency for sponsors, sites, investigators and site staff during site selection, feasibility, and the conduct of clinical trials.

The SIP provides a platform for multiple participating biopharmaceutical clinical trial Sponsors (“SIP Sponsors”) to communicate directly with participating sites and investigators (“Site Users”) while conducting clinical trials, and to make it easier for clinical trial sites and investigators to participate in trials by enabling them to enter required information only once and making that information visible to multiple study Sponsors. The SIP is designed to help Site Users work with Sponsors, so you need to select at least one SIP Sponsor to register. Each Site User can choose which SIP Sponsors see their information at registration and change it in the settings menu. Please note that if a Site User does not consent to a SIP Sponsor seeing their SIP User Profile, that User will not be visible to that Sponsor in the SIP. When a new sponsor is added to the SIP, Sponsors will notify all Site Users, and ask if each Site Users wishes to share their information with the new sponsor. More information on the SIP and its features is available [here](#).

The IR is a database of facility and investigator contact and profile data accessible by participating biopharmaceutical clinical trial sponsors (“IR Sponsors”). The IR pulls data on investigators and sites from multiple sources, including IR Sponsors’ Clinical Trial Management Systems (“CTMS”) and third-party databases, including the FDA Debarment Database, Citeline, and the [DrugDev Investigator Network](#) to produce records with the most accurate and complete information. Investigators who register in the SIP can choose to consent to have their SIP User Profile transferred to the IR to be shared with the IR Sponsors. A Site User can participate in the SIP without having his or her information shared with IR Sponsors. When a new sponsor is added to the IR, the Sponsors will notify each Site User, and ask if they wish to share their information with the new sponsor or stop having their information shared with the IR. More information on the IR is available [here](#).

### 2. What Information Sponsors Might Collect About Site Users and How Sponsors Might Use That Information

The SIP and IR Sponsors are jointly responsible (“Joint Controllers”) for how Site User Personal Information is used in the SIP and IR respectively. Each sponsor is individually responsible (a “Controller”) for the uses it makes of Personal Information from the SIP or IR in the context of its own activities, for example if a

Sponsor contacts a Site User to assess a Site User’s suitability for a particular trial or when it maintains records of a trial. For the purposes of this Policy, except Section 11, **Personal Information** is defined as any information that relates to an identified or identifiable living individual; or information, which when collected together can lead to the identification of a particular person.

**i. Processing in the SIP**

| Processing purpose                                                                                                                                                                                                               | Personal Information                                                                                                                                                               | Legal basis                                                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To recruit investigators, assess trial feasibility and design and conduct clinical trials                                                                                                                                        | Information from a Site User’s SIP User Profile, including contact details, professional history and affiliations and training history.                                            | Legitimate interest to conduct clinical trials to study marketed and investigational treatments, including, but not limited to, safety and efficacy                                                                                                       |
| To meet recordkeeping obligations in connection with the clinical trials they conduct                                                                                                                                            | Information from a Site User’s SIP User Profile, including contact details, professional history and affiliations, and training history.                                           | Compliance with legal and regulatory obligations and legitimate interest to comply with regulatory obligations                                                                                                                                            |
| To allow Sponsors to use a Site User’s SIP User Profile to assess a Site User’s interest and/or help determine whether to select you for a clinical trial and a Site User’s contact information to engage you to conduct a trial | Information from a Site User’s SIP User Profile, including contact details, professional history and affiliations, and training history.                                           | Consent                                                                                                                                                                                                                                                   |
| If you are participating in a trial run by a SIP Sponsor on SIP, for regulatory compliance and recordkeeping purposes and to maintain full and accurate study records                                                            | Information from a Site User’s SIP User Profile, including contact details, professional history and affiliations, and training history.                                           | Compliance with legal and regulatory obligations and legitimate interest to comply with regulatory obligations                                                                                                                                            |
| If you are participating in a trial run by a SIP Sponsor on SIP, for regulatory compliance and recordkeeping purposes and to maintain full and accurate study records                                                            | Forms containing a Site User’s Personal Information, as required by regulators                                                                                                     | Legitimate interest of the relevant Sponsors in conducting clinical trials to study marketed and investigational treatments, including, but not limited to, safety and efficacy potential treatments and complying with legal and regulatory obligations. |
| To track a Site User’s completion of required Sponsor or study-related training                                                                                                                                                  | Documentation relating to a Site User’s completion of training courses and certifications needed to participate in clinical trials (e.g., Good Clinical Practice (“GCP”) training) | Legitimate interest to conduct clinical trials and compliance with legal and regulatory obligations                                                                                                                                                       |
| To monitor a Site User’s completion of online training courses on how to use the SIP                                                                                                                                             | First name, last name, email address and details of the training                                                                                                                   | Legitimate interest in keeping records of training for Good Clinical Practice (“GCP”) / regulatory / compliance purposes.                                                                                                                                 |
| To track changes, you make to data for security and auditing purposes                                                                                                                                                            | Username, date and time stamp and information around the changes made                                                                                                              | Legitimate interest in keeping the information on the system secure                                                                                                                                                                                       |
| To share a Site User’s Personal Information with third parties Sponsors, retain to assist in the conduct of Studies, for example, clinical research associations                                                                 |                                                                                                                                                                                    | Legitimate interest in conducting clinical trials and compliance with legal or regulatory obligations                                                                                                                                                     |
| To share a Site User’s Personal Information with public registries of clinical trials (e.g., clinicaltrials.gov, EudraCT) where required by law.                                                                                 |                                                                                                                                                                                    | Compliance with legal and regulatory obligations and legitimate interest to comply with regulatory obligations                                                                                                                                            |

|                                                                                                                                                              |                                                                                                                                |                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| To process helpdesk requests sent by you and provide helpdesk services in connection with a Site User's use of the SIP                                       | Login information, first name, last name and email address, phone number (where applicable); license number (where applicable) | Legitimate interest in providing and managing the requested helpdesk services     |
| To provide SIP functionality                                                                                                                                 | IP address, browser type, operating system, language preferences and region                                                    | Legitimate interest in providing SIP functionality                                |
| To send you information about changes or updates to SIP, planned system outages and other issues related to the functioning and a Site User's use of the SIP | Email address                                                                                                                  | Legitimate interest in providing you with information about the SIP functionality |

Please note that where a Sponsor uses details for record-keeping purposes, they may add the details to one of their own internal record-keeping systems. For further information on such usage, please see sponsors' [individual privacy notices](#).

ii. **Processing in the IR**

|                                                                                                                                                                                                                                                                                              |                                                                                                                                                                     |                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sharing a Site User's SIP User Profile data with the IR, an independent database operated on behalf of the IR Sponsors by DrugDev, Inc.                                                                                                                                                      | Information from a Site User's SIP User Profile, including contact details, professional history and affiliations, and training history.                            | Consent                                                                                                                                                                                                                                                      |
| Using a Site User's SIP User Profile in the IR to ensure Sponsors' records are correct and up to date, to allow sponsors to contact you about potential clinical trials, and help make decisions about recruiting investigators, assessing study feasibility, and designing clinical trials. | Information from a Site User's SIP User Profile, including contact details, professional history and affiliations, and training history.                            | Consent                                                                                                                                                                                                                                                      |
| To keep other contact and profile information about you in the IR for                                                                                                                                                                                                                        | A Site User's Personal Information available through other sources, including sponsor CTMS systems, the DrugDev Investigator Network, FDA Debarment data, Citeline. | Legitimate interest to maintain full and accurate study records to comply with regulatory obligations, contractual basis, or consent, depending on the data source                                                                                           |
| Individual sponsors may use information to conduct analytics to support decisionmaking related to site selection, recruitment of investigators, assessing study feasibility and designing clinical trials                                                                                    |                                                                                                                                                                     | For further information on how sponsors may use a Site User's information for this purpose, please see the sponsors' individual privacy notices, available on their websites and linked in the contact table in <a href="#">Section 10</a> of this document. |

**3. Who do Sponsors Share Site User Data With?**

SIP uses Exostar, LLC ("[Exostar](#)") to provide identity management services and single sign-on credentials for the SIP. Before a Site User registers in the SIP, the Site User will be asked to provide their first name, last name, and email address to Exostar. Exostar will use that information to give the Site User single signon credentials used to verify his or her identity, which is necessary to keep his or her information and the SIP secure. Exostar's use of Site User data is governed by the Exostar Privacy Policy which is available [here](#). If you have any queries about Exostar's use of Site Users' Personal Information, please contact them directly using the details in that policy.

The Sponsors may share a Site User's Personal Information with other IT service providers as necessary to operate SIP or IR. In particular, Site User data will be processed by the following entities as part of their operation of the platforms ("Data Processors"):

- Cognizant Technology Solutions U.S. Corporation, the headquarters of which is at 500 Frank W. Burr Boulevard, Teaneck, NJ 07666, United States; and

- DrugDev, Inc., the headquarters of which is at 1170 Devon Park Drive, Suite 300, Wayne, PA 19087, United States of America.

The Sponsors have contracts in place with the Data Processors which require them to use Site User Personal Information only for the purpose of providing the services to the Sponsors. If you have any queries about the Data Processors' use of Site User Personal Information, please contact the Sponsors using the contact details in [Section 10](#) of this Privacy Policy.

To the extent permitted by applicable laws, individual Sponsors may also share Site User information with third parties they retain to assist in the conduct of Studies, for example, clinical research organizations or service providers for ancillary study systems. The Sponsors will ensure that those third parties only use Site User data in accordance with the terms of this Privacy Policy and the terms of the Sponsors' respective privacy notices.

Please note that the Sponsors reserve the right to disclose Site User Personal Information to third parties, to the extent permitted by applicable laws, where they believe this is necessary in order to exercise, establish or defend their legal rights; to comply with any legal obligation to which they are subject (such as an order of a court of competent jurisdiction); or to comply with a legal or regulatory requirement to publish certain aspects of Site User personal information in public registries of clinical trials (e.g., clinicaltrials.gov, EudraCT), if applicable.

**Site User Personal Information will not be sold, rented, or traded to any individual or company.**

However, if a Sponsor plans to sell its business or assets, it may disclose Site User Personal Information to the purchaser as part of the transaction.

#### **4. When Sponsors Might Use Site User Details to Contact a Site User**

If a Site User chooses to share his or her SIP User Profile with a Sponsor, the Sponsor might use the Site User information to help decide whether to select that Site User to participate in a clinical trial or use their contact information to engage a Site User to conduct a trial. Please note that some Site User Personal Information might be available to Sponsors from other sources outside the SIP User Profile – for example, if they have previously done a trial with the Site User. Where this is the case, they may contact Site Users who have not chosen to share their SIP User Profile with the Sponsors.

Site Users may also receive emails from time to time on behalf of the Sponsors with information about changes or updates to the SIP, planned system outages, and other issues related to the functioning and use of the SIP.

**No Marketing Communications.** Site Users will not receive marketing communications as a result of their Personal Information being submitted to or stored on SIP or IR.

#### **5. Where Site User Information is Stored**

The servers for both the SIP and the IR are located in the United States. Depending on where Site Users are located, this may mean their information will be transferred to a country where data privacy laws are different or less protective than their home country. A Site User's personal data may be accessed by SIP Sponsors (and IR Sponsors if he or she consents to sharing his or her SIP User Profile with IR) in any country in which a Sponsor does business due to the global nature of the Sponsors' operations. Where required by local law, a copy of a Site User's data may also be stored in the country where the Site User is based.

Site User Personal Information will be protected in accordance with this Privacy Policy at all times. Sponsors have executed data protection agreements and the Standard Contractual Clauses approved by the European Commission and the UK ICO with both Cognizant and DrugDev, as applicable, depending on whether Sponsors participate in the SIP, the IR or both. For more information on how Sponsors keep Site User data safe, please see [section 8](#).

## 6. Site User Rights and Choices About Personal Information

### i. Access and/or Correct Site User Data

A Site User can access or correct the information he or she has entered into SIP User and Facility Profiles at any time. If a Site User updates or corrects his or her SIP User Profile within the SIP, those changes will be shared only with the Sponsors with whom that Site User has consented to have their SIP User Profile shared.

Depending on where a Site User is located, he or she may under local law also have a right to data portability. A Site User can download his or her abbreviated CV or entire profile by accessing his or her profile through his or her SIP account.

If a Site User consented to share his or her SIP User Profile with IR, updating their SIP User Profile in the SIP ensures it will be updated in the IR.

If a Site User wants to see the historical trial data related to that Site User in IR, the Site User can click the link in their SIP User Profile marked "PI Study History." Clicking the link will redirect the Site User outside the SIP to a page with the Site User's information maintained by DrugDev at the direction of the Sponsors.

### ii. Withdrawal of Consent

A Site User can withdraw his or her consent to share his or her SIP User Profile with SIP Sponsors, IR Sponsors, or both at any time by going to the "Update SIP & IR Consent" screen in Settings.

If a Site User withdraws consent to sharing with IR, SIP will no longer share that Site User's SIP User Profile with the IR. This will not affect information which the IR may already hold about that Site User that does not come from the SIP, for example, if the Site User is a member of the DrugDev Investigator Network or has had direct contact with a sponsor outside the SIP, e.g., as an investigator on a trial. To update, amend, correct, or remove other Personal Information in the IR, please contact DrugDev directly at TDSE\_dqs@iqvia.com.

If a Site User is participating in a trial run by a SIP Sponsor on SIP, that Sponsor may retain the Site User's SIP User Profile for regulatory compliance and recordkeeping purposes even if that Site User withdraws his or her consent.

### iii. Close a Site User Account

A Site User can close his or her account in SIP by contacting [SIPHelp@cognizant.com](mailto:SIPHelp@cognizant.com). Once a Site User's account is closed, he or she will no longer have access to their SIP User Profile or be visible to Sponsors within the SIP. If that Site User has consented to have their SIP User Profile shared with the IR, closing the SIP account means that the Site User's profile will no longer be shared with the IR. Please note that Sponsors may retain SIP User Profiles for individuals who have or are participating in clinical trials for regulatory compliance and recordkeeping purposes even after an account is closed.

### iv. Retention of Data

If a Site User does not login to SIP for three years, his or her account will be automatically closed. A Site User will receive an email notification prior to account closure to provide an opportunity for the Site User to log in if they do not want the account to be closed.

Requests by users to exercise rights described in this Privacy Policy are managed by the relevant Data Processor on behalf of the Sponsors. They consult with the Sponsors when necessary, depending on the nature of the request.

- A Site User who wants to exercise any of their rights described in this Privacy Policy with respect to the SIP should contact Cognizant at [SIPHelp@cognizant.com](mailto:SIPHelp@cognizant.com) or at 1-855-770-2615. Contact numbers for other countries can be found at <https://www.sharedinvestigator.com/sipwsstatic/documents/SIP-Help-Desk.pdf>.
- A Site User who wants to exercise any of their rights described in this Privacy Policy with respect to the IR should contact DrugDev at TDSE\_dqs@iqvia.com.

Site Users are entitled to contact their local or any other competent supervisory authority for data protection to access further information about their rights and to lodge a complaint.

## 7. How Sponsors Use Cookies and How Site Users Can Manage Them

The table below lists the cookies which SIP uses.

**Essential cookies** are cookies that are strictly necessary to provide the SIP.

The **non-essential cookies** allow the service provider to report to the Sponsors on the performance of the SIP e.g., are all pages loading within the agreed time? If an individual user contacts the helpdesk with an apparent system performance issue, and the Site User has previously agreed to the use of the nonessential cookies, the information the non-essential cookies have collected can help identify the source of the issue. Cookies are not used to track a specific end user’s action on a page, outside of dealing with specific user issues.

| Name of Cookie    | Description                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Encrypted         | Essential cookie, Big IP encryption cookie. The cookie encrypts the public load balancer internal protocol (IP)                                                                                                                                                                                                                                                                                                           |
| Encrypt           | Essential cookie, Big IP encryption cookie. The cookie encrypts the public load balancer internal protocol (IP)                                                                                                                                                                                                                                                                                                           |
| COOKIE_SUPPORT    | Essential cookie, Liferay Product cookie. This cookie is set by the Liferay. This cookie is used for verifying whether the visitor browser support cookies.                                                                                                                                                                                                                                                               |
| GUEST_LANGUAGE_ID | Essential cookie, Liferay Product cookie, User Locale. This cookie is used to store the users language.                                                                                                                                                                                                                                                                                                                   |
| JSESSIONID        | Essential cookie, Liferay Product cookie, User Session. Used by SIP session cookies that are used to maintain users' state across different page requests.                                                                                                                                                                                                                                                                |
| _dd_s             | Non-essential session cookie, Datadog. Cookie used to group all events generated from a unique user session across multiple pages. It contains the current session ID, whether the session is excluded due to sampling, and the expiration date of the session. The cookie is extended for an extra fifteen minutes every time the user interacts with the website, up to the maximum user session duration (four hours). |
| dd_site_test_*    | Non-essential session cookie, Datadog. Temporary cookie used to test for cookie support. Expires instantly.                                                                                                                                                                                                                                                                                                               |
| dd_cookie_test_*  | Non-essential session cookie, Datadog. Temporary cookie used to test for cookie support. Expires instantly.                                                                                                                                                                                                                                                                                                               |
| IAG-SESSION       | Essential cookie, IBM Verify Application Gateway product cookie, User Session. Used to maintain user session information in the browser and pass on to the system on each transaction. Cookie is deleted when the current session ends.                                                                                                                                                                                   |

Site Users can manage their cookie preferences using the banner on the SIP homepage. The Customized Settings button will take a Site User to a pop-up that explains the specific types of cookies used by the SIP and lets the Site User choose between all cookies, or only essential cookies. Non-essential cookies are only placed if the Site User consent. If the banner does not appear, clearing the cache will make it reappear. A Site User can change his or her cookie preferences at any time.

**Do Not Track.** The laws of certain states in the U.S. require that site operators indicate whether they honor “Do Not Track” settings in a Site User’s browser concerning targeted advertising. When a user turns on Do Not Track, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, visit [www.allaboutdnt.org](http://www.allaboutdnt.org).

Site User data is used in accordance with this Privacy Policy, regardless of any “Do Not Track” setting. SIP provides controls to its users to restrict internal End-User-Monitoring through the non-essential cookie control. For more information on these controls, please see [Section 7](#).

There is no third-party advertising on the SIP.

## 8. How Sponsors Protect Site User Data

The Sponsors and their service providers take appropriate technical and organizational measures to ensure that Site User Personal Information is protected against accidental or unlawful destruction and against accidental loss, alteration, unauthorized disclosure, or access, as well as against all other unlawful forms of processing.

Other security measures include restriction of access to data on need-to-know basis (*i.e.*, to employees who require access to perform their job duties), use of information security tools (*i.e.*, antimalware protection, firewalls), physical security of premises where the information system is located, data recovery, and appointment of a data protection officer.

Site Users are responsible for maintaining the secrecy of their own individual passwords associated with their user IDs. If a Site User has security concerns (for example, if the security of any account has been compromised), please immediately notify Cognizant by contacting [SIPHelp@cognizant.com](mailto:SIPHelp@cognizant.com). For more detailed information on security protections, please see the [Privacy & Security FAQ](#).

## 9. Changes to this Policy

The Sponsors may update this Privacy Policy from time to time. Where the Sponsors make any material changes to this Privacy Policy, the revised policy will be posted on the SIP website and Sponsors will take additional measures to bring those changes to the attention of Site Users (for example, by posting a banner or emailing Site Users). Please revisit this Privacy Policy on a regular basis to keep informed of our privacy commitments with regards to the management of Site User Personal Information.

Nothing in this document is intended to supersede any Site’s Clinical Trial Agreement with a Sponsor.

## 10. How to Contact the Sponsors

To contact a particular Sponsor directly, please see below for contact details for each Sponsor. Site Users with additional privacy questions can consult the FAQ document on the SIP Resources page or reach out to the SIP-IR Privacy Council, which is a council of all of the SIP and IR data controllers. Site Users can reach the Privacy Council by emailing [SIP-IRPrivacyCouncil@kilpatricktownsend.com](mailto:SIP-IRPrivacyCouncil@kilpatricktownsend.com)

| Company              | Contact/Data Protection Officer                                                                                                                                                                                                                                            | Participation |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Abbvie               | Andreas Hildebrandt<br>EU Regional Data Protection Officer (DPO)<br>Knollstraße,<br>67061 Ludwigshafen, Germany<br>DPO: <a href="mailto:privacyoffice@abbvie.com">privacyoffice@abbvie.com</a><br><a href="#">Abbvie Privacy Notice</a>                                    | IR            |
| Amgen                | DPO: <a href="mailto:privacyoffice@amgen.com">privacyoffice@amgen.com</a><br><a href="#">Amgen Privacy Notice</a>                                                                                                                                                          | SIP/IR        |
| AstraZeneca          | DPO: <a href="mailto:privacy@astrazeneca.com">privacy@astrazeneca.com</a><br><a href="#">AstraZeneca Privacy Notice</a>                                                                                                                                                    | IR            |
| Boehringer Ingelheim | Boehringer Ingelheim Pharma GmbH & Co. KG - Data Protection Officer<br>Binger Straße 173<br>D-55216 Ingelheim am Rhein<br>Germany<br>DPO: <a href="mailto:datenschutz@boehringer-ingelheim.com">datenschutz@boehringer-ingelheim.com</a> <a href="#">BI Privacy Notice</a> | SIP/IR        |
| BMS                  | DPO: <a href="mailto:EUDPO@BMS.com">EUDPO@BMS.com</a><br><a href="#">BMS Privacy Notice</a>                                                                                                                                                                                | SIP/IR        |

|              |                                                                                                                                            |        |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------|--------|
| GSK          | DPO: <a href="mailto:eu.dpo@gsk.com">eu.dpo@gsk.com</a><br><a href="#">GSK Privacy Notice</a>                                              | IR     |
| J&J          | DPO: <a href="mailto:emeaprivacy@its.jnj.com">emeaprivacy@its.jnj.com</a><br><a href="#">J&amp;J Privacy Notice</a>                        | IR     |
| Lilly        | DPO: <a href="mailto:privacy@lilly.com">privacy@lilly.com</a><br><a href="#">Lilly Privacy Notice</a>                                      | SIP/IR |
| MSD          | DPO: <a href="mailto:MSD_privacy_office@msd.com">MSD_privacy_office@msd.com</a><br><a href="#">MSD Privacy Notice</a>                      | SIP/IR |
| Novartis     | DPO: <a href="mailto:global.privacy_office@novartis.com">global.privacy_office@novartis.com</a><br><a href="#">Novartis Privacy Notice</a> | IR     |
| Novo Nordisk | DPO: <a href="mailto:privacy@novonordisk.com">privacy@novonordisk.com</a><br><a href="#">Novo Nordisk Privacy Notice</a>                   | IR     |
| Pfizer       | DPO: <a href="mailto:privacy.officer@pfizer.com">privacy.officer@pfizer.com</a><br><a href="#">Pfizer Privacy Notice</a>                   | SIP/IR |
| Regeneron    | DPO: <a href="mailto:dataprotection@regeneron.com">dataprotection@regeneron.com</a><br><a href="#">Regeneron Privacy Notice</a>            | IR     |
| Roche        | DPO: <a href="mailto:global.privacy@roche.com">global.privacy@roche.com</a><br><a href="#">Roche Privacy Notice</a>                        | SIP/IR |
| Sanofi       | DPO: <a href="mailto:Privacy-Office-Global@sanofi.com">Privacy-Office-Global@sanofi.com</a><br><a href="#">Sanofi Privacy Notice</a>       | IR     |
| UCB          | DPO: <a href="mailto:dataprivacy@ucb.com">dataprivacy@ucb.com</a><br><a href="#">UCB Privacy Notice</a>                                    | IR     |

**i. CCPA Privacy Notice**

This portion of our Privacy Policy advises California residents of the categories of Personal Information the Sponsors collect from Site Users, the applicable rights as provided in the California Consumer Privacy Act (“**CCPA**”) and how to exercise these rights by communicating with us. The Sponsors provide Site Users with the rights described below when Site Users use the SIP. Please note that the Sponsors will seek to verify the Site User’s identity when the Sponsors or Cognizant receive an individual rights request to ensure the security of Site User Personal Information. For purposes of this section, “**Personal Information**” is defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Registered User or household.

The Sponsors collect the following categories of Personal Information from Site Users:

- Identifiers;
- Internet or other similar network activity;
- Professional or employment-related information;
- Non-public education information;
- Inferences drawn from other Personal Information

Additional information about the information the Sponsors collect from Site Users is described in [Section 2](#) above.

California users can make any of the requests described below, such as access and deletion, by contacting Cognizant at [SIPHelp@cognizant.com](mailto:SIPHelp@cognizant.com) or 1-855-770-2615. [Contact numbers for other countries can be found here.](#) Site Users may authorize an agent to make such a request on their behalf. The Sponsors or Cognizant will seek to verify the Site User’s identity and their agent’s authority when either a Sponsor or Cognizant receives an individual rights request from on a Site User’s behalf to ensure the security of Site User Personal Information. The Sponsors may need to collect additional Personal Information for verification.

**ii. Right to Deletion of Personal Information**

California residents have the right to request the deletion of Personal Information as prescribed in Section 1798.105(a) of the CCPA. Sponsors and Cognizant may not delete some or all Personal Information if, among other reasons, such Personal Information is necessary for Sponsors and Cognizant or their service providers or affiliates, to:

- Complete the transaction for which the Personal Information was collected, provide a product or service requested by the Registered User, or reasonably anticipated within the context of Sponsors' ongoing business relationship with the Registered User, or otherwise perform a contract between Sponsors and the Registered User, including statutory data retention obligations that apply to clinical trials,
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity,
- Debug to identify and repair errors that impair existing intended functionality,
- Exercise free speech, ensure the right of another Registered User to exercise his or her right of free speech, or exercise another right provided for by law,
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6
- (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code,
- Enable solely internal uses that are reasonably aligned with the expectations of the Registered User based on the Registered User's relationship with Sponsors,
- Comply with a legal obligation, or
- Otherwise use the Registered User's Personal Information, internally, in a lawful manner that is compatible with the context in which the Registered User provided the Personal Information.

**iii. Right of Access: Right to Request Disclosure of Data Collection and Sharing Practices**

Site Users may request to receive details about how the Sponsors collect, use, and share Site User Personal Information twice a year for a twelve (12)-month look back period. Specifically, Site Users may request to receive the specific pieces of information that the Sponsors have collected about them by contacting the Sponsors as provided in the "Contact" section below.

Site Users may also request to receive:

- the categories of Personal Information that the Sponsors have collected,
- the categories of Personal Information that the Sponsors have disclosed for a business purpose, the categories of sources from which the Sponsors collected the Personal Information,
- our purposes for collecting that Personal Information, and
- the categories of parties with whom the Sponsors share Site User Personal Information.

**iv. Right to not be Discriminated Against for Exercising User Rights**

A business cannot discriminate against a Site User for exercising a CCPA right. The Sponsors do not discriminate against Site Users for exercising any of their CCPA rights, such as the access and deletion rights described above.

**v. Categories of Personal Information Collected about California Registered Users and the Purposes of Such Collection**

See [Section 2](#): "What Information the Sponsors Might Collect About Site Users and How the Sponsors Might Use It" above for the categories of Personal Information the Sponsors have collected for the past 12 months along with the purposes for which they are collected. Some of the purposes for collection are "business purposes" under the CCPA.

**vi. Right to Opt-Out of Sale and Categories of Personal Information Sold about California Registered Users**

If a business sells Personal Information, Site Users have a right to opt-out of that sale. Sponsors and Cognizant do not sell Registered Users' Personal Information. Sponsors and Cognizant do not knowingly collect or sell the Personal Information of Registered Users under 16 years old.

**vii. Categories of Personal Information Disclosed for a Business Purpose**

Sponsors and Cognizant may share Site User Personal Information, including a Site User's name, email address, mailing address, and phone number, with Third Party Providers that perform a variety of services on our behalf, such as gathering and storing data Site Users upload to the SIP and system analytics.

Sponsors may share Site User Personal Information with other entities for purposes of a sale, merger, or other related corporate event. An entity that buys a Sponsor or a part of a Sponsor's business may continue to use Site User Personal Information in accordance with this Privacy Policy.

Sponsors and Cognizant may also share Site User Personal Information with third parties, to the extent necessary to: (1) cooperate with law enforcement; or (2) exercise or defend legal claims.