

TRI PRIVACY NOTICE

We are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect will be processed by us. Please read this privacy policy carefully to understand our views and practices and your rights regarding your personal data. By visiting any of our websites (**our sites**) you are accepting and consenting to the practices described in this policy.

Contact us

Questions, comments and requests regarding this privacy policy are welcomed. For the purposes of data protection legislation, the Data Controller is Neil Watkins and he can be contacted at neil.watkins@tritrials.com or the following address:

TRI
The Bradfield Centre
184 Cambridge Science Park
Milton Road
Milton
Cambridge
CB4 0GA

Tel: +44 (0)20 8817 5296

What type of information do we have?

We currently collect and process the following information:

- **Personal identifiers:** including name, title, job title, company, work address, telephone numbers and email addresses.
- **Company identifiers:** including company name, work addresses, telephone numbers, website URLs and contact email addresses.

How do we get the information?

We get that information from various sources, including:

- Information you give to us. Most of the information we process is provided to us
 directly by you by filling in forms on our site or by corresponding with us by
 phone, email or other mechanisms. The information you give us may include your
 name, address, email address and phone number and financial information.
 Please let us know if any of this information changes so we can keep our records
 up to date.
- **Information we collect from your use of our site.** With regard to each of your visits to our site we may collect the following information:



- technical information, such as the Internet protocol (IP) address used to connect your device to the Internet, whereabouts you connected to our service, your internet service provider (ISP), and what type of device you are using to access our service;
- **Information we collect throughout our relationship.** This is information relating to products that you download.
- **Information we collect when you call us.** If you call us we may collect the following information:
 - the phone number used to call us
 - a recording of all inbound and outbound calls
- **Information we receive from other sources.** We are working closely with other organisations, including our existing customers, suppliers, marketing and event companies.

Why do we collect this information?

We use this information in the following ways:

- Information you give to us or which we receive from other sources can be used to:
 - to assess whether we can enter into a contract with you and successfully and legitimately perform our contract with you. This includes carrying out our obligations to you and providing you with our, or a third party's products and services;
 - o improve our services to you;
 - ensure that content from our website is presented in the most effective manner for you and for your device;
 - o deal with any legal queries relating to your use of our service;
 - provide you with service communications so that we can perform our obligations to you. These may be sent by email. These will include notifications about changes to our service, event details and information about products that you have signed up to;
 - provide you with marketing communications including, with your permission, information about other goods and services we offer that are similar to those that you have already purchased or enquired about; or
 - in our or a third party's legitimate interests of keeping customers up to date with goods and services, increase awareness of us and third parties within the market, making promotional offers and generating new business, building and maintaining loyalty or market share.
- Information we collect from your use of our websites will used for the following purposes:
 - to administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;



- o to improve our site to ensure that content is presented in the most effective manner for you and for your device;
- o as part of our efforts to keep our site safe and secure;
- o to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- Information we collect throughout our relationship. We will use this information to help us provide you with our services and fulfil our contractual obligations.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do
 this by contacting <u>neil.watkins@tritrials.com</u>
- We have a contractual obligation.
- We have a legitimate interest.

How long do we keep hold of your information?

• We will keep information about you for a maximum of 7 years after the end of our relationship with you unless obligations to our regulators require otherwise or we are required to remove such data from our records.

Who might we share your information with?

You agree that for the purposes set out in the 'Why do we collect this information?' section above, we have the right to share your personal information with:

- Selected associated third parties, some of whom we appoint to provide services, including:
 - business partners, subsidiaries, affiliates, suppliers and sub-contractors for the performance of any contract we enter into with you;
 - analytics and search engine providers that assist us in the improvement and optimisation of our site;
 - Customer survey providers in order to receive feedback and improve our services.
- Any member of our group, which means our subsidiaries.

Additionally, we will disclose your personal information to the relevant third party:

In the event that we sell or buy any business or assets, in which case we will
disclose your personal data to the prospective seller or buyer of such business or
assets.



- If we are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply
 with any legal obligation, or in order to enforce or apply our terms of use and
 other agreements; or to protect the rights, property, or safety of our customers,
 our regulator, or others.

How is your data stored and kept secure?

At TRI we take your safety and security very seriously and we are committed to protecting your personal and financial information. All information kept by us is stored on secure servers.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

What are your rights?

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at the address above or through the "Contact Us" section of our Sites. You have the right:

- to ask us not to process your personal data for marketing purposes. We will
 inform you (before collecting your data) if we intend to use your data for such
 purposes or if we intend to disclose your information to any third party for such
 purposes;
- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- to ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest.
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal



- obligation or the data is children's data and was collected in relation to an offer of information society services;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing);

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority at any time.

Changes to our privacy policy

This policy may be updated from time to time. Please check back frequently to see any updates or changes to our privacy policy.

Cookies

We may use cookies to distinguish you from other users of the Sites. This helps us to provide you with a good experience when you use the Sites and also allows us to improve the Sites.

Last updated: 9th December 2018