

Privacy Policy

Last updated: June 12, 2021

1. Introduction

This Privacy Policy describes the types of information gathered by TrialSight, Inc. (“TrialSight,” “us” or “we”) in the process of providing this website (the “Site”), as well as how we use it, with whom the information may be shared, what choices are available to you regarding collection, use and distribution of information and our efforts to protect the information you provide to us through the Site. This Privacy Policy does not apply to information received by us outside of the process of providing the Site, for example, our activities as a business associate of covered entities which are subject to the terms and conditions of applicable business associate agreements and other agreements.

By accessing or using the Site, you hereby consent to allow us to process information in accordance with this Privacy Policy. Please also refer to our Terms of Service which are incorporated as if fully recited herein (“Terms of Service”). Terms defined in the Terms of Service that are not defined herein shall have the same definition as in the Terms of Service.

We may revise or update this Privacy Policy by posting an amended version through the Site and making you aware of the revisions, which may be through posting to the Site or otherwise. Your continued access to or use of the Site following our notice of changes to this Privacy Policy (or other acceptance method) means you accept such changes. Please refer to the “Last updated” date above to see when this Privacy Policy was last updated.

2. Who Collects Your Information On Our Site?

We collect information from you on the Site, including certain information that can identify you as a person (“Personally Identifiable Information” or “PII.”), and we are responsible for protection of your information.

3. What Information Do We Collect?

3.1. Personally Identifiable Information. We may request specific PII about you in order to register you for an account to use the Site, add you to our email list, facilitate your requests to enroll in clinical trials listed on the Site, or fulfill your requests for information. You may choose not to provide your PII, but then you might not be able to take advantage of some of the features of our Site and Site. The types of PII we may collect and save include:

- Contact and account registration information such as username, name, birth date, address, email address telephone number, and birth date;
- Information you provide such as feedback, comments or other messages;
- Technical information collected in our logs, such as standard web log entries that contain your IP address, keystrokes and clicks while using the Site, page URLs, the pages and features accessed most frequently, time spent on a page, how pages and features are used, previous page and referring page URLs, search terms entered, and similar analytics about use of the Site or Site;
- Device information such as mobile phone provider associated with the device you are using to access the Site or Site, your device’s unique identifier, the type of device and its operating system, and screen resolution of the device;
- Location-based information; and
- Health Information, as defined herein.

3.2. Health Information. As part of the functionality of the Site, users may request to enroll in certain clinical trials listed on the Site. Users submitting such requests may upload certain PII related to such

user's health condition, as required to process such enrollment requests ("Health Information"). You may not upload Health Information concerning another individual.

3.3. Anonymous Information. We may also collect anonymous, non-identifying and aggregate information such as the type of browser you are using, device type, the operating system you are using, and the domain name of your Internet service provider. We may create anonymous or de-identified information from PII. Information collected or created pursuant to this section will not be considered PII and not subject to the terms and conditions of this Privacy Policy.

4. **Why Is My Information Being Collected?**

4.1. We need to collect your PII so that we can respond to your requests for information and demonstrations or to be added to our emailing lists, and to process your requests for access to our Site. We also collect aggregate information to help us better design the Site and Site. We collect log information for monitoring purposes to help us to diagnose problems with our servers, administer the Site and Site, calculate usage levels, and otherwise provide services to you.

4.2. Health Information. Health Information is collected for purposes of processing your requests to enroll in clinical trials listed on the Site.

5. **How Do We Use the Information We Collect?**

5.1. We use the PII you provide for the purposes for which you have submitted it including:

- Responding To Your Inquiries and Fulfilling Your Requests. We may use your PII to respond to your inquiries and to fulfill your requests for information.
- Creating and Maintaining Your User Account. We use your PII to create and maintain an account for you to allow you to purchase and use the Site.
- Communicating With You About Our Site. We may use your PII to send you information about new features of the Site and other items that may be of interest to you.
- Sending Administrative and Promotional Emails. We may use your PII to send you emails to: (a) confirm your account and your other PII, (b) provide you with information regarding the Site, (c) inform you of changes to this Privacy Policy, our Terms of Service, or our other policies; or (d) provide you with information on our other services and products, or promotions related to the Site or our other services and products.
- Health Information. We may use your Health Information to provide certain functionalities of the Site, as directed by you, including processing your requests to enroll in clinical trials listed on the Site.

5.2. We may use anonymous information that we collect to improve the design and content of our Site, and to enable us to personalize your Site experience. We also may use this information in the aggregate to analyze how the Site is used, analyze industry trends, as well as to offer you programs or services.

6. **Do We Share Your Personally Identifiable Information?**

In general, we will not share your PII except: (a) for the purposes for which you provided it; (b) with your consent, or as you direct; (c) as may be required by law or as we think necessary to protect our organization or others from injury (e.g., in response to a court order or subpoena, in response to a law enforcement agency request, or when we believe that someone is causing, or is about to cause, injury to or interference with the rights or property of another); or (d) on a confidential basis with persons or organizations with whom we contract to carry out internal site operations, which may include for example, analytical services, or as necessary to render the Site. With your knowledge and consent, we may share your PII with our business partners, such as our marketing partners and event co-hosts. We may also

share aggregate information with others, including affiliated and non-affiliated organizations. Finally, we may transfer your PII to our successor-in-interest in the event of an acquisition, sale, merger or bankruptcy.

Your Health Information will be shared only with clinical trial sites that are running the clinical trial for which you submitted your enrollment request, as directed by you.

7. How Can You Access and Control Your Information?

We may provide you with options to access and control your information. If applicable, we will provide instructions on these options on the Site. If such options are provided, we will take reasonable steps to help verify your identity before granting access, making corrections or removing your information in order to protect your privacy and security.

8. How Do We Store and Protect Your Information?

8.1. After receiving your PII, we will store it on our Site systems for future use. We have physical, electronic, and managerial procedures in place to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect. Unfortunately, no data transmission over the internet or data storage solution can ever be completely secure. As a result, although we take industry-standard steps to protect your information (e.g., strong encryption), we cannot ensure or warrant the security of any information you transmit to or receive from us or that we store on our or our service providers' systems.

8.2. If you are accessing the Site from outside of the USA, you understand that your connection will be through and to servers located in the USA, and the information you provide will be securely stored in our web servers and internal systems located within the USA.

8.3. We store your PII until we are required to remove it. We store our logs and other technical records in accordance with internal practices and policies, and potentially indefinitely.

9. How Do We Use Cookies And Other Network Technologies?

9.1. To enhance your online experience with us, our web pages may presently or in the future use "cookies." Cookies are text files that our web server may place on your hard disk to store your preferences. We may use session, persistent, first-party and third-party cookies. Cookies, by themselves, do not tell us your email address or other PII unless you choose to provide this information to us. Once you choose to provide PII, however, this information may be linked to the data stored in the cookie.

9.2. Our Site uses Google Analytics, provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 ("Google"). Google Analytics uses cookies and similar technologies to collect and analyze information about use of the Site and report on activities and trends. This service may collect information regarding the use of other websites, apps and online resources. For more information on how Google uses data when you use our Site or Site, please follow this link: <https://policies.google.com/technologies/partner-sites>. You may be able to opt-out of some or all of Google Analytics features by downloading the Google Analytics opt-out browser add-on, available at, <https://tools.google.com/dlpage/gaoptout>. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit <http://optout.aboutads.info>.

9.3. We or our service providers may also use "pixel tags," "web beacons," "clear GIFs" embedded links, and other commonly used information-gathering tools in connection with some Site pages and HTML-formatted email messages for such purposes as compiling aggregate statistics about Site usage and response rates. A pixel tag is an electronic image (often a single pixel), that is ordinarily not visible to website visitors, and may be associated with cookies on visitors' hard drives. Pixel tags allow us and our service providers to count users who have visited certain pages of the Site, to deliver customized services, and to help determine the effectiveness of our Site and Site. When used in HTML-formatted

email messages, pixel tags can inform the sender of the email whether and when the email has been opened.

9.4. As you use the Internet, you leave a trail of electronic information at each website you visit. This information, which is sometimes referred to as “clickstream data”, can be collected and stored by a website’s server. Clickstream data can reveal the type of computer and browsing software you use and the address of the website from which you linked to the Site. We may use clickstream data as a form of non-personally identifiable information to determine how much time visitors spend on each page of our Site, how visitors navigate through the Site, and how we may tailor our web pages to better meet the needs of visitors. We will only use this information to improve our Site.

10. **Collection of Information by Others**

Our Terms of Service document identifies certain third party websites to which we may provide links that you may click on our Site. Please check the privacy policies of these other websites to learn how they collect, use, store and share information that you may submit to them or that they collect.

11. **California Privacy Rights**

11.1. If you are a resident of California, the California Consumer Privacy Act of 2018, as amended (“CCPA”), provides you with certain rights regarding your personal information. For purposes of the CCPA, we are a “Business,” you, if you are an individual residing in California, are a “Consumer,” and PII includes “Personal Information” as defined under the CCPA.

11.2. Consumers have the right to request that we disclose Personal Information we have collected about them in the previous 12 months including, but not limited to, the categories of information collected by us, the source(s) of such information by category, and the purpose for collecting such information. This right may not be exercised more than twice in a 12 month period.

In the previous 12 months, we have collected the following categories of Personal Information about Consumers:

- Identifiers, such as your real name, postal address, unique personal identifiers, online identifier, internet protocol (IP) address, email address, account name, and similar information;
- Characteristics of Protected Classifications, to the extent included in Health Information;
- Internet/Network Activity, which can include browsing history, cookies, search history and a Consumer’s interaction with a website;
- Personal Records Under the California Consumer Records Law (Cal. Civ. Code §1798.80) (“CCRLPI”);
- Geolocation data; and
- Inferences drawn from any other category of personal information.

We collect the Personal Information from our users and/or by automatic means. Such Personal Information is collected in order to provide the Site and its functionalities, to comply with applicable law, and as otherwise described above in this Privacy Policy.

11.3. As a Consumer, you also have the right to request that we tell you which of your Personal Information we have disclosed for a business purpose, or sold, in the previous 12 months, if any. In the past 12 months, we have disclosed Personal Information falling under the following categories of personal information:

- Identifiers;

- Internet/Network Activity; and
- Characteristics of Protected Classifications, to the extent included in Health Information.

We disclose Personal Information in the preceding categories to the Consumers themselves, to third parties as the Consumer may direct, our service providers, and/or government/law enforcement agencies pursuant to the following business purposes, the provision of the Site (the purpose that you provided it for), in response to a Consumer's specific request, to comply with applicable law, our legitimate internal business operations, and as otherwise described above in this Privacy Policy.

In the past 12 months we have not sold, and during the period of time which this privacy policy is posted we shall not sell, the personal information of any consumer, of any age.

11.4. You also have the right to request the deletion of Personal Information that we have collected from you at any time. However, we may not be required to comply such request under several circumstances including, but not limited to, when the data is necessary for the underlying transaction, to comply with applicable law, to detect security incidents, to debug glitches, and for our internal purposes.

11.5. In the event that you exercise one of your rights under the CCPA, you will not be discriminated against by us in any way, whether it is through the denial of goods/services, providing you a different level of goods/services, or charging (or suggesting that we will charge) you different prices for the goods/services unless such change in price is reasonably related to the value you receive from your Personal Information.

11.6. How do you exercise your rights under the CCPA?

Because we offer the Site exclusively online, you may submit requests to exercise your rights under the CCPA by contacting us at infosecteam@siterx.com, please include "Request for Privacy Information" in the subject line. You can also submit requests by calling us at +1 201-293-6517.

We will acknowledge receipt of your request within 10 days of receiving it, and use best efforts to respond within 45 days of receipt of your request, but in no event will our response come more than 90 days after your request. If we are unable to provide our response within the first 45 days following your request, we shall notify you as soon as we become aware of the possible delay and provide an explanation of why additional time is needed to respond.

Before we respond to any CCPA based requests relating to your personal information, we may take steps to reasonably verify the identity of the person making the request to make sure it's you, or your authorized agent (in either case, the "Requestor"). We do this to avoid disclosing your information to third parties and bad actors, not to inconvenience you in any way. For purposes of verifying identity, we will ask the Requestor to confirm at least two pieces of information that we have in our files. If an agent is acting on behalf of the Consumer, we will also need to verify the agent's identity and their authority to act on the Consumer's behalf. As the sensitivity of the information being requested increases, we will ask the Requestor to provide more information to verify their identity and/or authority to make the request. If the identity of the Requestor cannot be reasonably verified, either as the Consumer or their agent, then in order to protect that Consumer, we may not disclose or delete the personal information that is the subject of the request.

12. **Children and Privacy**

We do not knowingly permit users to register for our Site if they are under 13 years old, and therefore do not request PII from anyone under the age of 13. If we become aware that a customer is under the age of 13 and has registered without prior verifiable parental consent, we will remove his or her PII from our files. If you are the parent or guardian of a person under the age of 13 who has provided PII to us without your approval, please inform us by contacting us at infosecteam@siterx.com and we will remove such information from our database.

13. **Contact Information**

If you have any questions or suggestions regarding our Privacy Policy, please contact us at infosecteam@siterx.com.