

BIOSTAT SOLUTIONS, INC PRIVACY STATEMENT

Our dedication to protecting personal information that BioStat Solutions, Inc. “BSSI” holds is consistent with our core values of trust, respect, integrity and commitment. BSSI strives to make every effort to act in accordance with all applicable privacy legislation in the jurisdictions where BSSI conducts business. Please note that our business model limits us to processing de-identified (anonymous) personal information from pharmaceutical and biotech companies as well as other technical entities. We acknowledge, however, that an occasional and extremely rare breach may occur. In an effort to be completely transparent and assure individuals of the safety of their personal data, whether identifiable or anonymous, we subscribe to the Privacy Shield Principles as outlined in this policy.

BSSI complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. BSSI has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

BSSI is subject to the investigatory and enforcement powers of the United States Federal Trade Commission, (FTC).

Consent

The very nature of statistical analyses of genetic and clinical research requires confidentiality and privacy for the individual. Sensitive issues that may be encountered by BSSI, such as “medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex of the individual” are topics that are protected.

Limiting Use, Disclosure and Retention

Where BSSI receives personal information from its pharmaceutical or biotechnology clients and the choices made by individuals to whom such personal information relates, personal information will be retained only as long as necessary. Personal information BSSI may collect or receive from its pharmaceutical or biotechnology clients may include: biomarker and/or genetic data, patient reported outcomes, clinical laboratory test results, patient demographics, pharmacy information, radiology reports and images, pathology reports, hospital admission, discharge and transfers, ICD-9 codes, discharge summaries and progress notes.

Transfers to Third Parties

BSSI will only transfer anonymized personal information (in the form of Statistical Analysis Reports) about EU and Swiss individuals to third-parties (i.e., clients developing drugs, biologics, or medical devices). Our business practices do not include the transfer of any identifiable personal data to third parties for any reason. We are therefore not subject to the EU-US or Swiss-US Privacy Shield Liability Principles. If this practice should change in the future, we will update this policy and provide opt-in or opt-out choice, as applicable and attest to our liability for data transfer. Under the Privacy Shield, we may be required to release personal data of EU and/or Swiss individuals in response to lawful requests from public authorities including to meet national security and/or law enforcement requirements.

Accuracy

BSSI will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. BSSI will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete and current.

Safeguards

BSSI will employ reasonable safeguards to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. For personal information subject to electronic storage or transmission, BSSI maintains an internal private, secure network that is protected from computer virus infection and monitored for unauthorized access. Both electronic and paper based records holding personal information are maintained in access controlled facilities for which business continuity plans are required.

Access and Correction

EU and Swiss individuals have the right to access their personal information. Upon written request to BSSI from the originating entity (BSSI client), BSSI will provide individuals with reasonable access to their personal information assuming originating entity (BSSI client) can provide identifiers to allow for individuals to be correctly determined. BSSI will also take reasonable steps to allow individuals to review their information for the purposes of correcting their information. There are certain limitations to the Access and Correction rights, as set forth in the US Department of Commerce's EU-US and Swiss-US Privacy Shield website.

Challenging Compliance

In compliance with the US-EU and Swiss-US Privacy Shield Principles, BSSI commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact BSSI at: privacy@biostatsolutions.com.

BSSI has further committed to refer unresolved privacy complaints under the EU-US and Swiss-US Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacyshield/for-eu-consumers> for more information and to file a complaint.

Finally as a last resort and under limited circumstances, EU and/or Swiss individuals with residual complaints may invoke a binding arbitration option before a Privacy Shield Panel.

Any questions or concerns regarding the use or disclosure of personal information should be directed to BSSI at the email address listed above. BSSI will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principals contained in this Policy. BSSI has established internal mechanisms to verify its ongoing adherence to this Statement.