

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. BSSI complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. BSSI has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. BSSI is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). If there is any conflict between the policies 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 page, please visit <https://www.privacyshield.gov/>.

BSSI also complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. BSSI has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the US-Swiss Safe Harbor and to view our certification page, please visit <http://www.export.gov/safeharbor/>. Consistent with our commitment to internationally recognized information privacy principles, the following are incorporated into our business processes and practices.

### **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. For data containing the information to be re-purposed or disclosed to a third party, the individuals would have to agree to such a re-purposing, and must choose to ‘consent’ to this data transfer before such a transfer could take place.

### **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. Where BSSI collects personal information directly from individuals in the European Economic Area (EEA), it will inform them about the purposes for which it collects the personal information about them, the types of non-agent third parties to which BSSI discloses that information, and the choices and means, if any, BSSI offers individuals for limiting the use and disclosure of their personal information. Notice will be provided in clear and conspicuous language when individuals are asked to first provide personal information to BSSI, or as soon as practicable thereafter, and in any event before BSSI uses or discloses the information for a purpose other than that for which it was originally collected. The individual will be provided the choice to opt-out or opt-in before their data is shared with third parties other than BSSI clients.

### **Transfers to third parties**

BSSI will only transfer anonymized personal information (in the form of Statistical Analysis Reports) about EU individuals to third-parties (i.e., clients developing drugs, biologics, or medical devices) where the third-party (a) has provided satisfactory assurances to BSSI that it will protect the information consistently with the Statement; or (b) the third-party has also certified to the EU-US Privacy Shield where applicable; or (c) in response to a lawful request by public authorities to meet national security or law enforcement requirements, and is accordingly independently responsible for complying with the EU-US Privacy Shield requirements where applicable. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, BSSI is potentially liable. All third party recipients under the EU Safe Harbor Privacy Shield will be required and BSSI will ensure said recipients comply contractually to ensure compliance. BSSI may also be required to disclose an individual’s personal information in response to a lawful request by public authorities, including, but not exclusive to meeting national security or law enforcement requirements.

BSSI will only transfer anonymized personal information (in the form of Statistical Analysis Reports) about Switzerland individuals to third-parties (i.e., clients developing drugs, biologics, or medical devices) where the third-party (a) has provided satisfactory assurances to BSSI that it will protect the information consistently with the Statement; or (b) is located Switzerland or a country considered “adequate” for privacy by the EU Commission, and therefore is required to comply with the data protection laws in force within the EU countries or Switzerland or subsidiary equivalent privacy laws; or (c) the third-party has also certified to the Swiss Safe Harbor principles where applicable; or (d) in response to a lawful request by public authorities to meet national security or law enforcement requirements, and is accordingly independently responsible for complying with the Swiss Safe Harbor requirements where applicable. BSSI may also be required to disclose an individual’s personal information in response to a lawful request by public authorities, including, but not exclusive to meeting national security 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 individuals have the right to access their personal information. Upon written request to BSSI, BSSI will provide individuals with reasonable access to their personal information. 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 Privacy Shield website.

### **Challenging Compliance**

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

BSSI has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and 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 [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/) for more information and to file a complaint. Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

In compliance with the US-Swiss Safe Harbor Principles, BSSI commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss citizens with inquiries or complaints regarding this privacy policy should first contact BSSI at: [privacy@biostatsolutions.com](mailto:privacy@biostatsolutions.com).

BSSI has further committed to refer unresolved privacy complaints under the US-Swiss Safe Harbor to an independent dispute resolution mechanism 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 [www.bbb.org/us/safe-harbor-complaints](http://www.bbb.org/us/safe-harbor-complaints) for more information and to file a complaint.

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.