

Privacy Policy

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Privacy Policy

This policy was last updated on the 8th April 2019.

Our commitment to your privacy

ADELPHI is committed to protecting and respecting your privacy. We take our responsibilities regarding the security of information that we have collected seriously. This privacy policy sets out how we use and protect the information that you provide to us. Please read this policy carefully. If you have any questions, please contact compliance.team@adelphigroup.com.

In this policy **ADELPHI**, **we**, and **us** means the Adelphi Group of Companies listed in the section Adelphi Group of Companies. **ADELPHI** is the controller for the personal information.

Adelphi Group of Companies – who are we?

This privacy policy applies to the Adelphi companies listed below who are established within the EU, or those outside who process details of EU Citizens.

<p>Adelphi Group Ltd</p> <p>Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 1975338 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>Adelphi Real World</p> <p>Adelphi Group Ltd trading as Adelphi Real World Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 1975338 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>Adelphi Research</p> <p>Adelphi International Research Ltd trading as Adelphi Research Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2419446 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>Adelphi Research</p> <p>Adelphi Research by Design LLC trading as Adelphi Research 2005 S. Easton Road, Suite 300, Doylestown, PA 18901.</p>
<p>Adelphi Values Ltd</p> <p>Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2761308 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>Adelphi Values LLC</p> <p>290 Congress Street, 7th Floor, Boston, Massachusetts 02210</p>
<p>THE PLANNING SHOP International, Ltd.</p> <p>CP House, 97-107 Uxbridge Road, London W5 5TL. Company No: 3037899 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>THE PLANNING SHOP International, Inc.</p> <p>2005 South Easton Road, Suite 300, Doylestown, PA, 18901.</p>

<p>Adelphi Communications Ltd</p> <p>Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2761321 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>Adelphi Communications LLC</p> <p>33 Irving Place, New York, NY 10003</p>
<p>2TheNth Ltd</p> <p>Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2072694 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>Excerpta Medica BV</p> <p>Amsterdam, Apollo Building, Herikerbergweg 17, 1101 CN Amsterdam, Netherlands. Amsterdam Trade Register number: 5082 5461</p>
<p>Excerpta Medica BV UK Branch</p> <p>Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW Company No: BR014830 Registered address: Bankside 3, 90 - 100 Southwark Street, London, England, SE1 0SW</p>
<p>Excerpta Medica LLC</p> <p>2005 S. Easton Road, Suite 300, Doylestown, PA 18901 EIN 27-3145979</p>

How we use your information?

People who have contacted us with a request for information

If you have requested information from **ADELPHI**, we will collect and process the personal data that you provide in order to respond to your request. Unless you consent to the contrary, we shall only use your personal data to provide the information you have requested.

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession

We will process your personal information where there is a legitimate interest in us doing so, if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). For example, if you are requesting information about a company or a service from **ADELPHI** (see section Adelphi Group of Companies), then we may pass your personal data onto another member of the group to enable them to appropriately respond to your request. Again unless you consent to the contrary, that member shall only use your personal data to provide the information you have requested.

If you apply to work with us?

Our Recruitment Privacy Notice explains how and why we use your personal data, including how long we keep it and who we share it with. Please see [Recruitment Privacy Notice](#).

If you are employed by us

Our Workplace Privacy Notice explains how and why we use your personal data, including how long we keep it and who we share it with. You will be given the Workplace Privacy Notice if you are offered employment by us and it also available on the **ADELPHI** intranet and from HR.

Commercial and marketing communications

We use the information we collect or receive, such as your email address, phone number, postal address, to communicate directly with you. We may ask you to give us your consent to send you emails containing newsletters or updates or contact you on other ways. If you do not want to receive such communications, you will be given the option to unsubscribe or change your preferences.

Where individuals do not have a relationship with us, for example, if we have identified them from public domain information or purchased a mailing list, as we feel they may have an interest in our services, we shall be relying on our legitimate interests to engage in promotional activities including direct marketing. See section Your data protection rights on page 9.

People who participate in our market research, health outcomes or observational research projects

How we use your personal data

ADELPHI and its suppliers use your personal data for conducting market research, health outcomes or observational research projects ('research') either as **ADELPHI** or on behalf of our clients. We use your personal data for the following purposes:

- Performance of research and analysis either as **ADELPHI** or on behalf of our clients;
- Monitoring and keeping records of communications between you and **ADELPHI** staff;
- Compliance with our contracts with our clients;
- Sharing of information, as needed, with translators, analysts, data processing companies, fieldwork agencies;
- Adherence and compliance with legal and regulatory obligations, requirements and guidance.

Types of personal data we collect

The nature of the personal data collected about you will depend on your relationship with **ADELPHI** and the type of work we conduct. **ADELPHI** typically uses a network of fieldwork partners and clinical sites to recruit participants to participate in a research project and conduct interviews. ('fieldwork partner'). Please read the fieldwork partner's privacy policy for further information about the data that they collect and what it is used for. Typically, the fieldwork partner assigns a respondent identifier to minimise the personal data collected by **ADELPHI**.

Types of personal data that maybe collected include:

- Respondent identifier assigned by the fieldwork partner;
- Information submitted by you during a research interview or when completing a paper or internet questionnaire. This may include information on age, gender, nationality, health data: including, for example, disease specific experience or drug purchasing/prescribing history, Adverse Events;
- System access information, such as user names, passwords and other personally identifiable information;
- Your bank account details;

- Remuneration, including honoraria/fees for service and expenses payment in relation to your participation in, and contribution to, programmes and services;
- Your contact details, such as title, name, email address, mobile/telephone number and company information such as job title/role, office location, mobile/telephone number.

Sources of your personal information

Most of the personal information **ADELPHI** processes is provided directly by you, or by the fieldwork partner. Sometime the sponsoring client may provide a list of names for the purposes of contacting potential respondents. **ADELPHI** will follow the client's instruction on processing the personal data but will ensure that the personal data is processed according to data protection legislation including assurance that the list of names can be legitimately used for the intended research purpose.

Legal grounds for processing your personal data

Under data protection legislation, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. Typically, for research **ADELPHI** relies on Legitimate Interests and Consent. **ADELPHI** may also be required to use your personal data to comply with its legal obligation.

Consent

To process your personal data, we obtain your explicit consent. This means that before we collect any information from you we ensure that you are provided with full details about the purpose and nature of the project and what will happen to the information we collect.

Withdrawal of your consent

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent. See section Your data protection rights on page 9.

Legitimate interests

Examples of personal data that maybe processed using legitimate interests:

- Maintaining records relating to your participation in research projects;
- Adhering to legislation, governmental and regulatory bodies guidance. Adhering to good governance requirements, such as internal reporting and compliance requirements;
- Audit requirements;
- Monitoring and keeping records of communications between you, the fieldwork partner and **ADELPHI** staff;

Sharing your personal data

In some cases, we may need to share personal information with third parties that provide research services in support of the research project e.g. translators, analysts, data processing companies, fieldwork agencies. Any third party that receives personal information is obligated to follow all the same privacy protection regulations as followed by **ADELPHI**.

Retention of personal data

ADELPHI will not retain your personal information for longer than is necessary. At the end of the research project **ADELPHI** redact (remove) the personal data no longer required for the project. This means that most of the personal data collected during the research project is deleted and there is minimal personal data retained by **ADELPHI**.

People who engage in our medical communications, medical education and publication programmes

How we use your personal data

ADELPHI and its suppliers use your personal data for running medical communications, medical education and publication programmes ('programmes') either as **ADELPHI** or on behalf of our clients. We use your personal data for the following purposes:

- Booking travel and providing other logistical support on your behalf when participating in, or providing services related to programmes;
- Monitoring and keeping records of communications between you and **ADELPHI** staff;
- Evaluation of medical experts both for **ADELPHI** and our clients whom we support to deliver medical communication programmes;
- Sharing of information, as needed, with our clients and suppliers;
- Contacting your nominated contact in event of an emergency;
- Compliance with our contracts with our clients;
- Adherence to legal and regulatory obligations, requirements and guidance.

Types of personal data we collect

The nature of the personal data collected about you will depend on your relationship with **ADELPHI** and the type of work we conduct, but may include the following:

- Your contact details, such as title, name, email address, mobile/telephone number and company information such as job title/role, office location, mobile/telephone number;
- Records of communications with you and other parties e.g. telephone calls, on-line meetings, emails, chat or text messages;
- Information supplied by you, your colleagues, our client or third parties, such as academic, career history, medical background, clinical practice, field of research, practice and other professional specialism information;
- Your participation in, or provision of services related to programmes that may be required to be put on public record;
- Remuneration, including honoraria/fees for service and expenses payment in relation to your participation in, and contribution to, programmes and services;
- Relevant activities associated with the work we undertake, on social media and other publicly available digital channels, used as part of services and business activities we undertake for or that which is necessary as part of our wider business engagement;
- System access information, such as user names, passwords and other personally identifiable information that would allow **ADELPHI** to access IT systems and/or operate on your behalf when nominated to do so by you.

We may with your consent, also retain the following:

- Your date of birth, age, gender;
- Your nationality;
- Your bank account details;
- Details of nominated contacts, such as next of kin;

Sources of your personal information

Most of the personal information **ADELPHI** processes is provided directly by you and by your administrative support staff. For example, you tell us your contact details and banking details. We may also obtain your personal data from our clients where we are running a programme or service on their behalf.

Legal grounds for processing your personal data

Under data protection legislation, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. Typically, for our programmes we rely on Contract, Legitimate Interests and Consent. **ADELPHI** may also be required to use your personal data to comply with its legal obligation.

Legitimate interests

Examples of personal data that maybe processed using legitimate interests:

- Maintaining records relating to your participation in programmes;
- Adhering to legislation, government and regulatory bodies guidance and compliance requirements;
- Audit requirements;
- Tracking and record-keeping of communications between you and **ADELPHI** staff;

Contract

Example of personal data that maybe processed using the performance of a contract:

- The processing is necessary for the execution of a contract in which you are a party. The contract maybe with you and **ADELPHI** or you and our client.

Consent

Example of personal data that maybe processed where you have given specific consent to the processing of your data.

- Retaining your contact details and company information for potential future projects.

Withdrawal of your consent

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent. See section Your data protection rights on page 9.

Sharing your personal data

ADELPHI may share information with the following third parties when running programmes:

- Clients of **ADELPHI**;
- Suppliers and agents, such as travel agents;
- Regulatory organisations.

How long do we keep your personal data for?

ADELPHI will not retain your personal information for longer than is necessary. The period for which we keep your personal data will be determined by several criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations.

Typically, to comply with our legal and regulatory obligations we will retain your personal data for up to 10 years.

If you use our website

When you visit one of the **ADELPHI** websites, we will collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. Our web servers capture IP Addresses that are stored in log files by default for troubleshooting connections. We purge all web server log files every **30** days.

We do not make any attempt to find out the identities of those visiting our websites. We will not associate any data gathered from these sites with any personally identifying information from any source. If we do want to collect personally identifiable information through our websites, we will ask your permission and explain what we intend to do with it.

Appropriate security measures are in place, in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from our websites.

Log files

As is true of most web sites, we gather certain information automatically and store it in log files. This information is related to the use of this site and services. We use this information to analyse trends, to administer the site, to track users' movements around the site, to gather demographic information about our user base as a whole and to monitor for malicious activity etc.

Cookies

Like most websites we use 'cookies' to collect anonymous statistics about how people use the site, and to help us keep it relevant for the user. Cookies 'remember' bits of information from your visit to the site.

A cookie is a simple text file that's stored on your computer or mobile device by a website's server. Only that server can retrieve or read the contents of that cookie. Each cookie is unique to your web browser. So if we put a cookie on your computer, it can't be read by any other website.

If you don't want your web visits to be tracked for statistical purposes like this you can set your computer to block cookies at any time. The way in which you do this depends upon the web browser which you use. Go to <http://www.allaboutcookies.org/> to find out more.

How we use cookies to collect statistics

To improve our service, we collect anonymous web statistics using a cloud tool called Google Analytics. This stores a few cookies on the users' computers or mobiles devices to tell us how many people have visited each web page, how they got there, and where they navigate from there. The data collected is completely anonymously and does not store any personal details. If you want to stop our websites collecting usage data about you via Google Analytics, you can disable cookies in your browsers, disable JavaScript in your browser and use Google's Opt-out browser add-on: <https://tools.google.com/dlpage/gaoptout>

How long do we keep your personal data for?

We are required by law to keep your personal data only for as long as is necessary for the purposes for which we are using it. The period for which we keep your personal data will be determined by several criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations.

We keep a backup of our data to restore the original data after a data loss event. When we delete your personal data, it will be deleted from the live storage immediately but there will be a delay before it is removed from the backup data.

Who do we share your information with?

We use selected agents to process your information on our behalf, such as software providers to host our website. Such third parties will be authorised to see and use your information but only to fulfil their contractual obligations to us and will not be permitted to use it for any other purpose. We retain full responsibility for how your personal information may be used by such agents.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff of **ADELPHI** who are operating outside the EEA. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We may share your personal information so that we can comply with a legal obligation to which we are subject. For example: where we are obliged to share your personal information with regulatory bodies which govern our work and services; government departments such as law enforcement and HMRC; court orders etc.

We will process your personal information where there is a legitimate interest in us doing so if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). For example, if you are requesting information about a company or a service from a member of **ADELPHI** (see section Adelphi Group of Companies), then we may pass your personal data onto another member of the group to enable them to appropriately respond to your request. Again, unless you consent to the contrary, that member shall only use your personal data to provide the information you have requested.

We may share your data when conducting research, running programmes, if you apply to work with us and if you are employed by us. See the relevant sections in this privacy policy.

ADELPHI does not sell, trade or rent your personal information.

Transfers of personal data outside the EEA

In connection with our business and for employment, administrative, management and legal purposes, we may transfer your personal data outside the EEA to members of our group and processors in the United States and on occasion other jurisdictions in which we are established. Some of our systems are hosted in the United States. We will ensure that the transfer is lawful and that there are appropriate security arrangements.

Where we need to transfer your information outside of the European Economic Area we only do so to countries which have been determined by the European Commission to have an adequate level of data protection or by using a variety of legal mechanisms, including the US Privacy Shield and Standard Contractual Clauses, to help ensure your rights and protections.

Our US offices have Privacy Shield certification. **ADELPHI's** Privacy Shield certification, along with additional information about the Privacy Shield, can be found at <https://www.privacyshield.gov/>.

How we protect your information?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

To protect your personal data **ADELPHI** employ:

- technical measures, including but not limited to, robust network security, firewalls, anti-virus protection, regular internal and external oversight and inspection, including penetration testing, access controls, audit trails, encryption of devices and data both whilst at rest and during any transmission to and from third parties in order to keep your personal data secure.
- organisational measures including, but not limited to, training of all individuals who process personal data in data protection and information governance, the creation of and adherence to appropriate policies and procedures.

Your data protection rights

You have specific rights connected to provision of your personal information to **ADELPHI**, although in some cases these rights are subject to certain conditions and limitations. To exercise any of these rights please contact us using the contact details in section Contact details on page 10.

Right to be informed

You have the right to be told how your personal information is/will be used. This Privacy Policy and our Recruitment and Workplace Privacy notices are intended to provide a clear and transparent description of how your personal data may be used.

Right of access to your information

You can request a copy of the information held relating to you. Please ensure that you include your name and clear instructions on what you would like us to do. If you require us to supply you with details of the personal information that we hold about you, then we will provide this information free of charge and we will provide this information to you within one month of your request unless the request is complex or is numerous requests. If this is the case, we will inform you within one month of your request about the reason for the extension of time.

Right of erasure (right to be forgotten)

You have the right to have your personally identifiable data deleted.

Right of rectification

If you believe the records that **ADELPHI** keep are inaccurate, you have the right to ask for these to be updated.

Opt-out of marketing communications

You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. You can also opt-out of other forms of marketing (such as postal marketing or telemarketing), by contacting us.

Withdraw your consent

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Complaints

If you have complaints relating to our processing of your personal data, you should raise these with the **ADELPHI** compliance department; see section Contact details on page 10, or you can raise directly with the relevant supervisory authority.

In the UK: Information Commissioner’s Office (ICO). They can be contacted via their website <https://ico.org.uk/>

In the Netherlands: Autoriteit Persoonsgegevens. They can be contacted via their website <https://autoriteitpersoonsgegevens.nl>

Contact details

Adelphi Group
ATTN: Compliance Department
Adelphi Mill, Bollington
Cheshire SK10 5JB, UK
Email: compliance.team@adelphigroup.com .

Adelphi Group (Excerpta Medica)
ATTN: Compliance Department
Apollo Building, Herikerbergweg 17
1101 CN Amsterdam, Netherlands
Email: compliance.team@adelphigroup.com

Changes to this privacy policy

We keep our privacy policy under regular review and reserve the right to revise it at any time. Any changes we may make to our privacy policy in the future will be posted on this page. There is a date at the beginning of this policy which indicates the date it was updated. Please revisit this policy each time you consider giving personal information.