

Privacy Policy

Updated: December 11, 2019

Health+Commerce, Inc. (“we”, “our”, “the Company”) respect your privacy. This Privacy Policy explains our data collection practices and your choice about the way your information is used on our websites. The use of information collected through your interactions with us and our websites shall be limited to the purpose of providing the service for which the client has engaged the company.

The Company participates in and has certified its compliance with the EU-US and the Swiss-U.S. Privacy Shield Frameworks. The Company is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework’s applicable Principles. To learn more about the Privacy Shield Framework, visit the US Department of Commerce’s Privacy Shield website (<https://www.privacyshield.gov>).

The Company is responsible for the processing of personal data, meaning information which is related to an identified or identifiable natural person, we receive under the Privacy Shield Frameworks and subsequently transfers to a third party acting as an agent on its behalf. The Company complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions. If we have received your personal data from you and subsequently transfer it to a third party service provider for processing, we will remain responsible if they process your personal data in a manner inconsistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, The Company is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, The Company may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the Privacy Shield Principles, we commit to resolve complaints about your privacy and our collection or use of your personal data transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact us at: info@healthandcommerce.com. If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed, you can also submit your complaint to PrivacyTrust, an independent third party. Visit <https://www.privacytrust.com/drs/healthandcommerce> to file a complaint.

By using our websites, you signify your assent to our Policy. If you do not agree with this Policy, you are not permitted to use our websites.

Data We Collect



Personal Data: In order to provide you our services we may collect and store your personal data. You may give us your personal data voluntarily and directly when you contact us, complete forms on our websites or in hard copy, participate in a survey, subscribe to receive our marketing communications or other interactions with us.

We may also gather personal information from publicly available sources, media reports or through a third party that may make your information publicly available, such as speaking at events or publishing articles or other news stories.

We may also collect biometric data and other relevant information for the purpose of preliminary screening for clinical trials. We do not gather any of this information about you unless you voluntarily provide it to us and give us your consent for its processing.

When inquiring about our services or your eligibility for a clinical trial, we may collect your name, email address, mailing address and phone number. Any information you provide us in an email contact form is used only to respond to your inquiry, which may be by email or a phone call from one of our representatives if you provide phone contact information.

Any information you voluntarily provide to us in a questionnaire on a clinical trial website is used only to enable the local research site in your area to contact you about that study, and only with your consent. Any information your local research site provides to us will be anonymized and we will not associate any of your personal contact information with your personal health information.

BY VOLUNTARILY PROVIDING US WITH PERSONAL DATA, YOU ARE CONSENTING TO OUR USE OF IT IN ACCORDANCE WITH THIS PRIVACY POLICY. OUR BUSINESS REQUIRES THAT PERSONAL DATA BE PROCESSED BY US IN THE UNITED STATES OF AMERICA, WHERE OUR COMPUTING SYSTEMS AND INFRASTRUCTURE ARE LOCATED. FEATURES AND CAPABILITIES OF OUR WEBSITE AND RELATED SERVICES WOULD NOT BE AVAILABLE WITHOUT SUCH PROCESSING OF PERSONAL DATA IN THE UNITED STATES OF AMERICA. ACCORDINGLY, IF YOU PROVIDE PERSONAL DATA TO US, YOU ACKNOWLEDGE AND AGREE AND CONSENT THAT SUCH PERSONAL DATA MAY BE TRANSFERRED FROM YOUR CURRENT LOCATION TO THE OFFICES AND SERVERS OF COMPANY AND THE AUTHORIZED THIRD PARTIES REFERRED TO HEREIN LOCATED IN THE UNITED STATES.

YOU MAY HAVE THE RIGHT TO EXERCISE ADDITIONAL RIGHTS WITH RESPECT TO YOUR PERSONAL DATA WHICH ARE AVAILABLE TO YOU UNDER APPLICABLE LAWS, INCLUDING: (A) RIGHT TO ERASURE, DELETION OR CORRECTION OF PERSONAL DATA; (B) A RIGHT TO OBJECT TO, OR TO RESTRICT, PROCESSING OF PERSONAL DATA, OR (C) A RIGHT TO REQUEST INFORMATION ABOUT DATA WE COLLECT OR TO REQUEST PORTING PERSONAL DATA. IF YOU WOULD LIKE TO EXERCISE SUCH RIGHTS, PLEASE CONTACT US AT info@healthandcommerce.com.

Non-Personal Data: When you use our websites (collectively, the "Site"), we may automatically collect certain technical information about your equipment, browsing actions and patterns. This information is collected through the use of cookies and other similar technologies and cannot presently be used to specifically identify you. Company may store such information itself or such information may be included in databases owned and maintained by Company affiliates, agents or service providers
Cookies: In operating the Site, we may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Services gives to your browser when you access the Services. Our cookies help provide additional functionality to the Site and help us analyze Site usage



more accurately. In all cases in which we use cookies, we will not collect personal data except with your permission. On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. Please note that if you turn off cookies, you may not be able to take advantage of some of the Site features.

Aggregated Personal Data: In an ongoing effort to better understand and serve our users, we may conduct research on our customer demographics, interests and behavior based on the information provided to us. This research may be compiled and analyzed on an aggregate basis, and Company may share this aggregate data with its affiliates, agents, business partners and customers. This aggregate information does not identify you personally. Company may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Analytics and Tracking Technologies: We may, and we may allow third party service providers to, use cookies (as noted above) or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Site.

Our website uses Google Analytics, which is a web analysis service that employs cookies that are stored to your computer in order to facilitate an analysis of your use of the website. The information generated by these cookies, such as time, place and frequency of your visits to our website, including your IP address, is transmitted to Google’s location in the US and stored there. Google uses this information to analyze and report on your use of our website. Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google’s behalf. You can opt-out of making your activity on the website available to Google Analytics by installing the Google Analytics opt-out browser add-on from <https://tools.google.com/dlpage/gaoptout>. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about website activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

Uses of Personal Information Collected Through This Site

The Company will process Personal Information only in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, we will take reasonable steps to ensure that Personal Information is accurate, complete, current, and reliable for its intended use.

The Company does not disclose, give, or sell any personally identifiable information you provide through an email, online inquiry form to any outside organizations for any reason other than the reason described at the time of its collection (other than where we may be required to by law and as stated in this Policy).

We collect personal information to enable us to respond to requests from clients and potential clients.



We also collect and use information to respond to media requests for interviews and questions. We may also collect information you voluntarily provide to us conduct preliminary screenings for clinical trials.

We may use your personal information to conduct marketing activities, including sending you information by mail, phone, or email depending on the form(s) of communication you have consented to. We may use your personal information for business administration legal compliance purposes including to comply with our legal obligations, enforcing our legal rights, and protecting the rights of third parties.

We retain your personal information as long as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

You may sign up to receive newsletters from us. If you would like to discontinue receiving this information, you may update your email preferences by using the “Unsubscribe” link found in emails we send to you, or please send us an email at info@healthandcommerce.com.

Personal Information of Children

Our websites are intended for ages 18 and older. We do not intend to or knowingly collect personal information from anyone under the age of 18. If you are under the age of 18, please do not submit any personal data through the Services. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on the Services without their permission. If you have reason to believe that a child under the age of 16 has provided personal data to us, please contact us, and we will endeavor to delete that information from our databases.

Sharing your Information

We may share your personal information with our affiliates, our agents, partners, clients, contractors, professional advisors or government or regulatory bodies to provide services to our clients, process transactions, fulfill information requests, updating marketing lists, managing our business, comply with legal obligations, and conduct ancillary operational tasks. Our agents, partners, and contractors will only use your information as it is necessary to perform their tasks and functions. Unless sharing your information with another company is required to perform a necessary task or function, we will not share it with them to use without your consent. When we transfer your information to third party, we will ensure they maintain an appropriate level of security to ensure your data is protected. We will not sell your information to other companies. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, Health+Commerce, Inc. remains liable.

SECURITY

We take reasonable steps to protect the Personal Data provided via the Services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from the Services may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to Company via the Internet.



LINKS TO OTHER WEBSITES

We may, on occasion, make available on our website links that will give you access to other websites that may be of interest to you but that we do not control. We cannot be responsible for the privacy policies of such other websites. If you submit personal information to any of those websites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

This Site may integrate with social networking services. You understand that we do not control such services and are not liable for the manner in which they operate. This Policy does not apply to these third-party websites and third-party service providers.

Confidentiality and Security of Your Personal Information

We are committed to keeping the personal information you provide to us secure and we take reasonable and appropriate measures to protect your personal information.

How We Respond To Do Not Track Signals

Our website currently does not respond to “Do Not Track” (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Changes to this Privacy Policy

We may make co to be informed of how we use your personal information.

How to Contact Us

If you have any questions, concerns, or complaints about our Privacy Policy or how We handle your personally identifiable information, please contact a representative at Health+Commerce, Inc., 1619 Fourth Street, Santa Rosa, CA 95404, or email info@healthandcommerce.com. A representative will immediately investigate any complaint about our use of your personally identifiable information.

Acceptance of Privacy Policy

By using our websites and any websites for clinical studies, you signify your assent to our Policy. If you do not agree with this Policy, you are not permitted to use our websites.

