Community Clinical Research ("we," "us," or "our") is committed to protecting the privacy of Personal Data (i.e., information reasonably related to a specific individual). This Privacy Notice describes how we process Personal Data collected through our websites, social media accounts, and other online services (collectively, our "Digital Properties") and other online and offline interactions.

This Privacy Policy does not apply to data we collect about you that is subject to federal research regulations applicable to the research studies we conduct (like the Common Rule or FDA research regulations). If you participate in one of our research studies, please review the informed consent form for the relevant research study to learn more about how we handle data we collect about you during that research study.

This Privacy Notice also does not apply to information about our current/former employees, applicants, and other individuals who interact with us for employment-related purposes.

Whenever you interact with us on behalf of another individual or entity, such as if you refer a friend to us, you must obtain their consent (or have the legal authority without consent) to share their Personal Data with us.

Changes to this Privacy Notice

We may update this Privacy Notice from time to time. Any updated Privacy Notice will be effective when posted. Please check this Privacy Notice periodically for updates. If required by law, we will obtain your consent or contact you directly if there are material changes to this Privacy Notice.

1. Sources of Personal Data

We collect Personal Data about you from the following sources:

• **Directly from you.** We may collect Personal Data you provide to us directly, such as when you contact us through our Digital Properties or communicate with us online or offline.

• **Data collected automatically and through tracking technologies.** We may automatically collect information or inferences about you, such as through cookies and other tracking technologies, when you interact with our Digital Properties. This may include information about how you use and interact with our Digital Properties, information about your device, and internet usage information.

• **From third parties.** We may collect Personal Data from third parties, such as your treating healthcare providers who share your Personal Data with us to help determine your eligibility for one or more research studies we conduct or may conduct, service and content providers, our affiliated companies and subsidiaries, business partners, social media companies or other parties who interact with us.

• **From publicly available sources.** We may collect Personal Data about you from publicly available sources, such as public profiles and websites.

We may combine information that we receive from the various sources described in this Privacy Notice, including third party sources, and use or disclose the combined information for the purposes identified below.

2. Types of Personal Data We Collect

We may collect the following types of Personal Data about you. Except as otherwise specified, we may collect this Personal Data from both individuals and business contacts:

• **Identifiers**, such as your name, email address, telephone number, and device identifiers (e.g., cookie IDs and IP address).

• **Records about you**, such as physical characteristics or a description of you; the content, timing and method of communications you have with us, such as calls and emails; and information you share with or upload to our Digital Properties.

• **Demographic information**, such as age (including birthdates) and gender.

• **Internet or other electronic network activity information**, such as your browsing history, search history, preference information (including marketing and purchasing preferences), account settings (including any default preferences), and other information regarding your interactions with and use of the Digital Properties. For more information about cookies and other device data, please see Section 5 (Cookies and Other Tracking Technologies).

• **Non-precise geolocation data**, such as your location as derived from your IP address.

• **Professional or employment-related information (for business contacts)**, such as job title; organization; professional licenses, credentials, or affiliations; and other professional information.

• **Inferences drawn from any of the information we collect about your preferences or behavior**, including to assess the level of interest in our products and services based on frequency of visits and contact and determine your preferred frequency for receiving offers.

• **Sensitive Personal Data**, including the following:

o Racial or ethnic origin, political opinions, religious or philosophical beliefs, or union membership.
o Driver's License or photo ID
o Genetic data.
o Information about your health.
o Information concerning your sex life or sexual orientation.
o Citizenship, citizenship status, or immigration status.

3. How We Use Personal Data

We may use Personal Data for the following purposes:

• **To provide you or your company with products and services**, such as making our Digital Properties and other products and services available to you; determining whether you are potentially eligible for one or more research studies we conduct or may conduct; communicating with you (including notifying you about research opportunities, soliciting feedback or responding to requests, complaints, and inquiries); and providing similar services or otherwise facilitating your relationship with us. If we receive Personal Data about you to determine your eligibility for a specific research study we are conducting, we may retain and use that Personal Data to determine your potential eligibility for other research studies we conduct or may conduct.

• **For our internal business purposes**, such as day-to-day operation of our business; maintaining internal business records, such as accounting, document management and similar activities; enforcing our policies and rules; management reporting; auditing; and IT security and administration.

• **For our internal research and product improvement purposes**, such as verifying or maintaining the quality or safety of our products or services; improving our products or services; designing new products and services; developing and improving algorithms, artificial intelligence or machine learning tools and models; evaluating the effectiveness of our advertising or marketing efforts; and debugging and repairing errors with our systems, networks, and equipment.

• **For legal, safety or security reasons**, such as complying with legal, reporting, and similar requirements; investigating and responding to claims against us, our personnel, and our customers; for the establishment, exercise or defense of legal claims; protecting our, your, our customers', and other third parties' safety, property or rights; detecting, preventing, and responding to security incidents and health and safety issues (including managing spread of communicable diseases); and protecting against malicious, deceptive, fraudulent, or illegal activity.

• **In connection with a corporate transaction**, such as if we acquire assets of another business, or sell or transfer all or a portion of our business or assets including through a sale in connection with bankruptcy and other forms of corporate change.

• **For marketing and targeted advertising**, such as marketing our products or services or those of our affiliates, business partners, or other third parties. For example, we may use Personal Data we collect to personalize advertising to you (including by developing product, brand, or services audiences and identifying you across devices/sites); to analyze interactions with us or our Digital Properties; or to send you newsletters, surveys, questionnaires, promotions, or information about events or webinars. You can unsubscribe from our email marketing via the link in the email, opt out of text messages by responding "STOP" to the text message, or by contacting us using the information in Section 9 (Contact Information) below.

We may use anonymized, de-identified, or aggregated information for any purpose permitted by law.

4. How We Disclose Personal Data

We may disclose Personal Data to third parties, including the categories of recipients described below:

- **Affiliates and subsidiaries**, including parent entities, corporate affiliates, subsidiaries, business units, and other companies that share common ownership.
- **Service providers** that work on our behalf to provide the products and services you request or support our relationship with you, such as IT providers, internet service providers, data and web hosting providers, software service providers, email marketing providers, payment processing companies, data analytics providers, and companies that provide business support services, financial administration, or event organization.
- **Professional consultants**, such as accountants, lawyers, financial advisors, and audit firms.
- **Vendors necessary to complete transactions you request**, such as the United States Postal Service, shipping companies and logistics providers.

- **Law enforcement, government agencies, and other recipients for legal, security, or safety purposes**, such as when we share information to comply with law or legal requirements, to enforce or apply any agreements between us or policies that apply to you, and to protect our, our customers', or third parties' safety, property, or rights.

- **Other entities in connection with a corporate transaction**, such as if we acquire assets of another entity, or sell or transfer all or a portion of our business or assets including through a sale in connection with bankruptcy and other forms of corporate change.

- **Business partners** that may use Personal Data for their own purposes, such as:

    - Advertisers, ad platforms and networks, and social media platforms;
    - Third parties whose cookies and tracking tools we use as described in Section 5 (*Cookies and Other Tracking Technologies*).
    - Commercial data partners to whom we make information available for their own marketing purposes; and
    - Partners who work with us on promotional opportunities, including co-branded products and services.

  Where required by law, we will obtain your consent prior to disclosing your Personal Data to our business partners. Where recipients use your Personal Data for their own purposes independently from us, we are not responsible for their privacy practices or personal data processing policies. You should consult the privacy notices of those third-party services for details on their practices.

- **The public**, such as when you have an opportunity to make comments regarding us or our products that we may share with the public, including comments on our social media posts and testimonials or reviews on our Digital Properties. Any Personal Data in comments, reviews, or other content that you share in public areas of our Digital Properties may be read, collected, or used by other users or the public.

- **Entities to which you have consented to the disclosure**.

5. Cookies and Other Tracking Technologies

Our Digital Properties and authorized third parties use cookies and other tracking technologies to collect information about you, your device, and how you interact with our Digital Properties. This section contains additional information about:

The types of tracking technologies we use and the purposes for which we use them
The types of information we collect using these technologies
How we disclose or make information available to others
Choices you may have regarding these technologies

Types of cookies and tracking technologies we use

We and the third parties that we authorize may use the following tracking technologies:

- **Cookies**, which are a type of technology that install a small amount of information on a user's computer or other device when they visit a website. Some cookies exist only during a single session and some are persistent over multiple sessions over time.
- **Pixels, web beacons, and tags**, which are types of code or transparent graphics. In addition to the uses described below, these technologies provide analytical information about the user experience and help us customize our marketing activities. In contrast to cookies, which are stored on a user's computer hard drive, pixels, web beacons, and tags are embedded invisibly on web pages.
- **Session replay tools**, which record your interactions with our Digital Properties, such as how you move throughout our Digital Properties and engage with our webforms. In addition to the uses described below, this information helps us improve our Digital Properties and identify and fix technical issues visitors may be having with our Digital Properties.
- **Embedded scripts and SDKs**, which allow us to build and integrate custom apps and experiences on our Digital Properties

Purposes for using these technologies

We and authorized third parties use these technologies for purposes including:

- **Personalization**, such as remembering language preferences and pages and products you have viewed in order to enhance and personalize your experience when you visit our Digital Properties;
- **Improving performance**, such as maintaining and improving the performance of our Digital Properties;
- **Analytics**, such as analyzing how our websites are used. For example, we use Google Analytics to help us improve the user experience. Google Analytics may use cookies and other tracking technologies to perform their services. To learn how Google Analytics collects and processes data, please visit: "How Google uses data when you use our partners' sites or apps" located at www.google.com/policies/privacy/partners;
- **Advertising**, such as conducting advertising and content personalization on our Digital Properties and those of third parties; tracking activity over time and across properties to develop a profile of your interests and advertise to you based on those interests ("interest-based advertising"); providing you with offers and online content that may be of interest to you; and measuring the effectiveness of advertising campaigns and our communications with you, including identifying how and when you engage with one of our emails; and
- **Security**, such as preventing fraud and malicious behavior

Information collected

These tracking technologies collect data about you and your device, such as your IP address, location (both approximate and precise) cookie ID, device ID, Ad ID, operating system, browser used, browser history, search history, and information about how you interact with our Digital Properties (such as pages on our Digital Properties that you have viewed).

Disclosures of your information

We may disclose information to third parties or allow third parties to directly collect information using these technologies on our Digital Properties, such as social media companies, advertising networks, companies that provide analytics including ad tracking and reporting, security providers, and others that help us operate our business and Digital Properties.

Your choices

Some of the third parties we work with participate with the Digital Advertising Alliance ("DAA") and Network Advertising Initiative ("NAI"). The DAA and NAI provide mechanisms for you to opt out of interest-based advertising performed by participating members at http://www.aboutads.info/choices/ and https://optout.networkadvertising.org/.

You can also refuse or delete cookies using your browser settings. If you refuse or delete cookies, some of our Digital Properties' functionality may be impaired. Please refer to your browser's Help instructions to learn more about how to manage cookies and the use of other tracking technologies. If you change computers, devices, or browsers; use multiple computers, devices, or browsers; or delete your cookies, you may need to repeat this process for each computer, device, or browser. Opting out of interest-based advertising will not opt you out of all advertising, but rather only interest-based advertising from us or our agents or representatives.

Some browsers have incorporated Do Not Track ("DNT") preferences. At this time, we do not honor Do Not Track signals.

6. Data Security and Data Retention

Although we maintain reasonable security safeguards, no security measures or communications over the Internet can be 100% secure, and we cannot guarantee the security of your information.

Your Personal Data will be retained as long as necessary to fulfill the purposes we have outlined above unless we are required to do otherwise by applicable law. This includes retaining your Personal Data to provide you with the products or services you have requested and interact with you; maintain our business relationship with you; improve our business over time; ensure the ongoing legality, safety and security of our services and relationships; or otherwise in accordance with our internal retention procedures. Once you have terminated your relationship with us, we may retain your Personal Data in our systems and records in order to ensure adequate fulfillment of surviving provisions in terminated contracts or for other legitimate business purposes, such as to enable easier future user onboarding, demonstrate our business practices and contractual obligations, or provide you with information about our products and services in case of interest.

7. Children's Privacy

Our Digital Properties are intended for individuals 18 years of age and older. The Digital Properties are not directed at, marketed to, nor intended for, children under 18 years of age. As a general rule, we do not knowingly collect any information, including Personal Data, from children under 18 years of age. If you believe that we have inadvertently collected Personal Data from a child under the age

of 18, please contact us at the address in Section 9 (*Contact Information*) below, and we will take prompt steps to delete the information.

8. External Links

Our Digital Properties may contain links to external sites or other online services that we do not control, including those embedded in third party advertisements or sponsor information. We are not responsible for the privacy practices or data collection policies of such third-party services. You should consult the privacy notices of those third-party services for details on their practices.

9. Contact Information

If you have questions regarding this Privacy Notice, please contact us at:

[info@phasewell.com]