

## **Trials4us: Privacy Policy**

This privacy policy sets out how Richmond Pharmacology Limited (with domain name [www.trials4us.co.uk](http://www.trials4us.co.uk) / [www.trials4japanese.co.uk](http://www.trials4japanese.co.uk)) (registered company number 04269261) registered at 1a Newcomen Street, London SE1 1YR (together referred to as "**Richmond**", "**our**" or "**we**") processes the personal data that you supply to us via our website, either as a website visitor or by registering as a clinical trial volunteer. Please read this privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your personal information.

If you are successful as a clinical trial volunteer, we may get in touch with you and request for more personal information. This will be handled in accordance with Richmond's "Informed Consent Form" and we will notify you of this at the time.

### **WHAT PERSONAL INFORMATION DO WE COLLECT?**

We will collect personal information from you when you register on our site for clinical trials and/or blood donations or respond to a survey or other marketing communication from us. We may also collect personal information through other features on our website and app. The types of personal information we collect include your:

- name;
- home address;
- phone number (home, work or mobile);
- email address;
- date of birth;
- gender;
- passport details or details relating to proof of identity;
- place of birth;

In certain circumstances (e.g. to assess eligibility for a clinical trial), we may also need to collect sensitive personal data about you, which may include information about your:

- health (e.g. if you are a smoker or how much alcohol you consume);
- ethnicity;
- height;
- weight
- blood type; and
- sexual orientation and practice (e.g. if you use contraception);

If you enrol for a clinical trial and to ensure your safety, we may also ask for personal information relating to your next of kin (e.g. their name and your relationship to them), or for personal information relating to whoever referred you to us (e.g. their name and contact details.)

If you are interested in any of our trials a Volunteer Recruitment staff will call you to collect further information to determine eligibility:

### **THIRD PARTIES PERSONAL INFORMATION**

Where you submit information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their information, the reason you have provided it, how they can contact us, the terms of this policy and that they have consented to such collection, use and disclosure.

### **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We will only use share your personal data for one or more of the following purposes:

- to analyse your suitability as a clinical trial volunteer, e.g. to check that you are of the correct age for the clinical trial;

- to respond to any enquiries or complaints you may have relating to our service;
- to send periodic emails regarding upcoming clinical trials and or blood donations, study-specific information, information regarding scheduled appointments, appointment reminders and general company information;
- to follow up with you for further correspondence (live chat, email or phone enquiries); and
- to ensure the security of your account and our business, for example, by requesting personal information to prevent or detect fraud or abuses of our website.

## **CHILDREN**

As a general policy, Richmond does not allow persons under the age of 18 to register on our website as a clinical trial volunteer. We also do not knowingly send marketing communications to persons under the age of 18. To the extent that Richmond does process children's personal data, it will take steps to ensure an enhanced level of data protection. In the case of children aged 16 and under Richmond shall ensure that consent is given or authorised by the holder of parental responsibility over the child. Where consent is relied upon in these circumstances, Richmond shall ensure that any information provided is understandable to children and approved by the relevant Ethics Committee.

## **INFORMATION FOR MARKETING PURPOSES**

Where you have consented to us using your personal data for marketing purposes, we may use your information as follows:

- to provide you with information about our clinical trials or blood donations which we feel may interest you;
- to administer a contest, promotion, survey or other site feature; and
- for market research purposes, where we may contact you to ask for your feedback.

If at any time after you have consented to us using your information for marketing purposes you wish us to stop using your information for these purposes, please use the appropriate opt-out link in our messages to you or email us at [volunteer@richmondpharmacology.com](mailto:volunteer@richmondpharmacology.com).

## **FOUNDATIONS FOR PROCESSING**

To process your data lawfully we need to rely on one or more valid legal grounds. Your consent to the processing specified in this privacy policy is the primary legal ground for our processing of your personal information. However, there may be circumstances where we also rely on other valid legal grounds, such as:

- our legitimate interests as a business (except where your interests or fundamental rights override these). For example, it is within our legitimate interests to use your data to prevent or detect fraud or abuses of our website; or
- our compliance with a legal obligation to which Richmond is subject. For example, we have a regulatory duty to investigate and respond to complaints made against us and may need to process your data as part of such investigation.

Please note that if you fail to provide personal information when requested, we may be prevented from complying with our legal obligation (such as to ensure your health and safety).

## **DISCLOSURE OF YOUR INFORMATION**

We do not sell or trade your personal information and our general policy is that disclosure of your personal information to third parties will only take place in accordance with the applicable law and

for the purposes listed above (and we will have made your personal information anonymous). However, there are circumstances where we may wish to disclose or be compelled to disclose your personal data to third parties. These circumstances include disclosure:

- to our outsourced service providers or suppliers to facilitate the provision of our clinical trials;
- to another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor company;
- to legal advisors who may need to manage or litigate a claim;
- to public authorities where we are required by law to do so; and
- to any other third party where you have provided your consent.

## **RETENTION OF PERSONAL DATA**

If you are, or have previously been, a clinical trial volunteer of ours or already registered on our site then we may continue to hold and process your information. Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this privacy policy (unless longer retention is required by the applicable law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review. We may keep an anonymised form of your personal information, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

## **DATA SUBJECT RIGHTS**

Data protection law provides individuals with numerous rights, including the right to: access, rectify, erase, restrict, transport, and object to the processing of, their personal data. Individuals also have the right to lodge a complaint with the relevant data protection authority if they believe that their personal data is not being processed in accordance with applicable data protection law.

- **Right to make subject access request (SAR).** Where we are processing your personal data as a data controller you may, where permitted by applicable law, request copies of your personal data. If you would like to make a SAR, i.e. a request for copies of the personal data we hold about you, you may do so by writing to the [volunteer@richmondpharmacology.com](mailto:volunteer@richmondpharmacology.com). The request should make clear that a SAR is being made. You may also be required to submit a proof of your identity and pay a reasonable fee.
- **Right to rectification.** You may request that we rectify any inaccurate and/or complete any incomplete personal data.
- **Right to withdraw consent.** You may, as permitted by applicable law, withdraw your consent to the processing of your personal data at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit certain service features for which the processing of your personal data is essential.
- **Right to object to processing.** You may, as permitted by applicable law, request that we stop processing your personal data.
- **Right to erasure.** You may request that we erase your personal data and we will comply, unless there is a lawful reason for not doing so. For example, there may be an overriding

legitimate ground for keeping your personal data, such as, a legal obligation that we have to comply with, or if retention is necessary for us to comply with our legal obligations.

- **Your right to lodge a complaint with the supervisory authority.** We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal data. However, you do have the right to contact the relevant supervisory authority directly. To contact the Information Commissioner's Office in the United Kingdom, please visit the <https://ico.org.uk/global/contact-us/> for instructions.

## **HOW DO WE PROTECT YOUR INFORMATION ON OUR WEBSITE?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible. We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

## **DO WE USE 'COOKIES'?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

## **WE USE COOKIES TO:**

- understand and save user's preferences for future visits;
- compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

## **THIRD-PARTY LINKS**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

## **GOOGLE ADVERTISING**

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users:

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We use Google AdSense Advertising on our website.

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We have implemented the following:

- Demographics and Interests Reporting;

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

Opting out of GOOGLE ADVERTISING:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt out Browser add on.

### **THE PRIVACY AND ELECTRONIC COMMUNICATIONS REGULATIONS 2003 (PECR)**

The Privacy and Electronic Communications Regulations 2003 (PECR) cover the sending of marketing emails. This legislation says that organisations must only send marketing emails to individuals if you have agreed to receive them, except where there is a clearly defined customer relationship.

The Information Commissioner's Office (ICO) can only investigate concerns about marketing emails from identifiable UK senders. As a lot of spam emails come from outside the UK, the Information Commissioner has an agreement with a number of overseas bodies to cooperate and exchange information to try and stop spam emails that are sent from those places.

If at any time you would like to unsubscribe from receiving future emails, you can:

- follow the instructions at the bottom of each email and we will promptly remove you from ALL correspondence.

### **CHANGES TO THIS PRIVACY POLICY**

As we strive to improve our service, we may review this policy from time to time. We reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy on our website. It is your responsibility to check our policy each time before you access our website for any changes.

### **CONTACTING US**

If there are any questions regarding this privacy policy, you may contact us using the information below:

Richmond Pharmacology  
1a Newcomen Street  
London  
SE1 1YR

England

info@richmondpharmacology.com

+44 (0) 20 7042 5800

<http://www.trials4us.co.uk> / [www.trials4japanese.co.uk](http://www.trials4japanese.co.uk)

Data Protection Officer:

Dr Keith Berelowitz

[DPO@richmondpharmacology.com](mailto:DPO@richmondpharmacology.com)

+44 (0) 20 7042 5800