

Aspirant Privacy Statement – Last Updated November 2022

This Privacy Statement explains how Aspirant collects and processes information during this engagement (the "**Engagement**"). We invite you to read this privacy statement, which describes our privacy and security practices. We want you to understand when and how data is handled by us through your engagement during the ENGAGEMENT.

1. Collection of Personal Information

"Personal information" is any information that can be used to identify you or that we can link to you.

Information We Collect from You

We collect, process, and use personal information during this Engagement.

The information we collect includes the information that you provide during the ENGAGEMENT including:

- Your Name;
- Your Curriculum vitae ("CV"); and
- Your email address

Additionally, we will collect your opinions on certain medical device systems. These opinions will be collected using the transcription feature on Microsoft Teams as well as through notes collected by our consultants. These opinions will be pseudonymized and entered into our Digital Discovery® tool as anonymous data points for research purposes.

2. How We Use the Information We Collect

During the ENGAGEMENT, your name and email address will be used to correspond with you to set up virtual meetings and to facilitate payment of your honorarium. Your CV will be utilized to determine your honorarium and immediately deleted upon that determination.

All data retention is subject to certain conditions detailed in the Aspirant Data Retention Policy. You can access the Aspirant Data Retention Policy for Market Research Projects at https://www.aspirant.com/hubfs/Aspirant_KOL_Records%20Retention%20Policy_Oct2022.pdf.

Your personal information (Name, CV, and email address) will not be sold to third parties and it will not be used for purposes of marketing.

3. How we share the information we collect

Other than pseudonymized analytics, we share the information we collect with third parties in limited situations. Specifically:

- **Service Providers:** We share your personal information with service providers to support our Services. These companies provide services such as: authentication systems, payment processing, and electronic signature. We have contracts with our service providers that address the safeguarding and proper use of your personal information.

- **Affiliates:** We may share your personal information with other companies under common ownership or control with Aspirant. These companies use your personal information as described in this Notice.
- **Consent:** We may share your personal information in other ways if you have asked us to do so or have given consent.

The data that is shared outside the European Union is shared pursuant to the terms set out in the standard contractual clauses or Model Clauses drafted by the EU Commission.

4. Legal Bases for Using Your Personal Information

If European Data Protection Laws applies, our lawful basis for collecting and using the personal information described in this Notice will depend on the type of personal information concerned and the specific context in which we collect or use it.

- **Performance of a Contract** – The use of your personal information is necessary to complete the contract that we have entered into with you.
- **Consent** – The use of your personal information is necessary both to set up virtual meetings and facilitate payment of the honorarium during the ENGAGEMENT.

5. Your Choices and Your Rights

You have certain rights regarding your personal information. Every user is entitled to the following:

The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service, based on the administrative costs of complying with the request if the request is manifestly unfounded or excessive; or if an individual requests further copies of their data following any such request.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we to complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions, detailed at <https://gdpr.eu/article-23-restrictions/>.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions, detailed at <https://gdpr.eu/article-23-restrictions/>.

The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions, detailed <https://gdpr.eu/article-23-restrictions/>.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions, detailed <https://gdpr.eu/article-23-restrictions/>.

If you make a request, we have one month to respond to you. We have engaged Juksta GDPR Representative Limited as our Article 27 GDPR Representative and Data Subject Requests are facilitated through their online web portal.

Web Portal: <https://requests.juksta.eu/aspirant>

Address: Juksta GDPR Representative Limited, 22 Northumberland Road, Ballsbridge, Dublin 4 Ireland

6. Other Websites/Services

Aspirant utilizes PayPal and DocuSign to facilitate payment and e-signature. Please note that when you utilize these services, you are entering a website which may have a different privacy policy. We encourage you to be aware of other third-party websites and their privacy notices.

7. How we protect Your Personal Information

We have implemented appropriate technical, physical, and organizational measures to protect your personal information from misuse or accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, acquisition, or access as well as other forms of unlawful processing. To achieve this, we have developed and implemented certain security policies and guidelines relating to the protection of your personal information.

8. Changes to this Privacy Notice

We may amend this Notice to reflect changes in the law, our companies, our Services, our data processing practices, or advances in technology. Our use of the personal information we collect is subject to the Privacy Notice in effect at the time such personal information is used.

9. How to contact us

If you have any queries about this Privacy Statement, please contact the Data Protection Officer at Aspirant. Aspirant's Data Protection Officer can be reached at legal@aspirant.com.

10. Children's Privacy

Our services are not designed for and are not marketed to people under the age of 18 or such other age designated by applicable ("minors"). We do not knowingly allow minors to use our Services. If you are a minor, please do not use our Services or send us your personal information. We delete personal information that we learn is collected from a minor without verified parental consent. Please contact us via legal@aspirant.com if you believe we might have information from or about a minor that should be removed from our system.

11. Information for California Residents

In addition to the other information and rights described in this Privacy Notice, California residents are also entitled to certain additional information and have certain additional rights under the California Consumer Privacy Act ("CCPA") with respect to their personal information. If you are a resident of California (a "Consumer" as defined by the CCPA), this section of the Privacy Notice applies to you. If you are not a Consumer, this section does not apply to you and you should not rely on it.

A. Information We Collect and How We Use It

Below is a summary of our collection and use of “personal information” (as defined by the CCPA) about Consumers in connection with our Services. For additional details, please consult the other sections of this Privacy Notice.

Categories of Personal Information we may collect and use for our commercial and business purposes.

- CV
- Name
- Email

Commercial and Business purposes for which we use the personal information we collect

- Determine honorarium amounts
- Facilitate honorarium payments using our third party vendor, PayPal
- Correspond with you regarding the set-up of virtual meetings
- Conduct virtual meetings, utilizing MS Teams, including its transcription feature
- Comply with legal obligations
- Meet legal retention periods
- Establish, exercise, or defined our rights in legal claims

B. The Right to Opt Out of Sales of Personal Information

Consumers have the right to opt out of “sales” of their personal information under the CCPA. Under the CCPA, and subject to certain exceptions, a business “sells” personal information when it sells, rents, releases, discloses, disseminates, makes available, transfers, or otherwise communicates orally, in writing, or by electronic or other means, a consumer’s personal information to another business or a third party for monetary or other valuable consideration. There are certain situations where we share personal information with other companies, as described in Section 3. You may submit a request to opt out of such sharing by emailing legal@aspirant.com.

C. The Right to Access

Consumers have the right to request certain details about the personal information we have collected about them (generally, within the past 12 months). This includes the right to request:

- The specific pieces of personal information and the categories of personal information that we have collected about them.
- What categories of personal information we sold or disclosed for business purposes and the categories of third parties to whom we sold or disclosed that information for a business purpose.
- The categories of sources from which we collected personal information.

D. The Right to Deletion

Consumers have the right to request that we delete the personal information we have collected from them. In certain circumstances, however, the CCPA allows us to retain information for particular purposes (for example, if we need to retain the information to meet our legal obligations, and for certain other limited reasons set forth by the CCPA).

E. How to Exercise Access and Deletion Rights

Consumers may submit requests for access to or deletion of their personal information by emailing legal@aspirant.com.

For security purposes, we will attempt to verify your identity prior to fulfilling your request. We may need to respond to your request or otherwise contact you to request additional information from you to verify your identity (including, but not limited to your name, email address, or telephone number).

If we are able to verify your identity, we will respond to your request to the extent we are able to and as required by law. If we cannot verify your identity, we may request additional information from you or we may deny your request. If we are unable to fulfill your request(s) in their entirety, we will provide further information to you about the reasons that we could not comply with your request.

Certain personal information may be exempt from such requests under applicable law. In addition, we need certain types of personal information so that we can complete the Engagement with you. If you ask us to delete it, you may not longer be able to access the Engagement.

F. The Right to Nondiscrimination

Consumers have the right not to be discriminated against for exercising their CCPA rights. We will not deny, charge different prices for, or provide a different level of quality of goods or services with respect to Consumers who choose to exercise their CCPA rights.

G. Authorized Agents

Consumers may designate an agent to make CCPA requests on their behalf. For Consumers who do so, we will take steps to verify both the identity of the consumer seeking to exercise their rights as described above, and to verify that the consumer's agent has been authorized by them to make a request on their behalf by requesting a signed written authorization or a copy of a power of attorney.

H. "Shine the Light"

California residents may ask for a list of third parties that have received your personal information for direct marketing purposes during the previous calendar year. This list also contains the types of personal information shared. We provide this list at no cost. If you are a California resident and would like to request this information, please contact us at legal@aspirant.com.

12. Your Choices and Your Rights

You have certain rights regarding your personal information. Every user is entitled to the following:

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15. How to contact us

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16. How to contact the appropriate authorities.

You also have the right to make a complaint to the appropriate authorities. By country they are as follows:

- United Kingdom: <https://ico.org.uk>
- Canada: <https://www.priv.gc.ca/en/>
- Germany: <http://www.bfdi.bund.de>
- Spain: <https://www.aepd.es>

- Austria: <http://www.dsb.gv.at>
- Sweden: <https://www.personuvernd.is>
- Italy: <http://www.garanteprivacy.it>
- Netherlands: <https://autoriteitpersoonsgegevens.nl>
- Switzerland: <https://www.edoeb.admin.ch/edoeb/de/home.html>
- France: <https://www.cnil.fr/en/home>

17. Supplemental Privacy Disclosures for Certain Countries.

IF you reside in one of the following countries, the below Privacy Notice also applies to the processing of your personal information. To the extent there is a conflict between the country-specific language below and the provisions above, the below provisions control to the extent of that conflict.

- Canada: Transfers to the U.S. and Third Countries. We may transfer your personal information outside of your jurisdiction for further processing where it will be subject to that foreign jurisdiction's law.

18. Changes to this Privacy Notice

We may amend this Notice to reflect changes in the law, our companies, our Services, our data processing practices, or advances in technology. Our use of the personal information we collect is subject to the Privacy Notice in effect at the time such personal information is used.