

# OmniScience Privacy Policy

OmniScience is committed to maintaining a privacy program that is designed around trust, transparency and respecting your rights in your personal information. This privacy notice describes how we process personal information, including what information we collect, why we collect it, how we use it, how we may share it, and your controls over your personal information.

## Scope

This privacy notice describes the personal information that we process as part of:

- Our websites where this privacy notice is provided,
- OmniScience-sponsored events and marketing activities,
- Engaging with representatives of our customers, suppliers and prospective customers and suppliers, and
- Our products.

## Information We Collect

**Websites.** When you visit our websites, we collect the following types of information.

Category of Information	Description
Device & Usage	We collect device and usage information such as cookie records, browser type, internet service provider (ISP), device IP address, operating systems and versions, advertising identifiers, device motion data, web beacons and clickstream data.
Registration	When you create an account, respond to surveys, register for events, subscribe to publications, or engage in any similar activities through our websites, we collect information that you provide

	through that process, such as your name, email address, phone number, username and password, job title and survey responses.
Account Verification	If you log into an account you've created with us, we collect your IP address, username and password, and other related information we need to verify you are the account owner, before allowing you to access that account.

**Events and Marketing.** When you register to attend an OmniScience-sponsored event, such as a webinar, summit or forum, or subscribe to our publications and newsletters, we collect the following types of information about you.

Category of Information	Description
Registration	When you create an account, respond to surveys, register for events, subscribe to publications, or engage in any similar activities through our websites, we collect information that you provide through that process, such as your name, email address, phone number, username and password, job title, survey responses and profile photos.

Account Verification	If you log into an account you've created with us, we collect your IP address, username and password, and other related information we need to verify you are the account owner, before allowing you to access that account.
Transactional	If there is a fee for the event you have registered for, we will collect information that allows us to collect and process your payment which may include your bank account information or credit or debit card number.
Attendance	When you attend an OmniScience-sponsored event, we collect information about the events you attend and how you engage with us and other event sponsors during the event. We may also take video recordings and photographs during the event that may include your likeness.
Device & Usage	When you attend an online event and access our publications and newsletters, we collect device and usage information such as cookie records, browser type, internet service provider (ISP), device IP address, operating systems and versions, advertising identifiers, device motion data, web beacons and clickstream data.

**Representatives of Customers, Suppliers and Prospective Customers and Suppliers.** If you are a representative of an OmniScience customer, supplier or prospective customer or supplier, we collect the following types of information about you.

Category of Information	Description
Professional Identity & Contact	We collect information such as your name, email address, phone number, gender, membership in professional associations, unique identification number assigned to your profession (such as NPI and license number) and the name, size and location of the company you work for and your role within it.

**Our Products.** As part of our products, we collect the following types of information about customers within the United States.

Category of Information	Description
Contact Info	We collect contact information such as your name and email address.
Device & Usage	We collect device and usage information such as cookie records, browser type, internet service provider (ISP), device IP address, operating systems and versions, and product usage.

We also process health-related information on behalf of clinical trial sponsors that meets the Health Insurance Portability and Accountability Act's (HIPAA's) de-identification standards such that the information is no longer considered protected health information or personal information subject to this privacy notice. We do not re-identify or attempt to re-identify any data which has been de-identified.

## How We Collect Information

**Websites.** When you visit our websites, we collect your information directly from you and indirectly from you by observing your actions on our website or from your devices. This includes collecting information using analytic tools and other tracking technologies. Please see our Cookie Notice below for more information.

**Events and Marketing.** When you register to attend an OmniScience-sponsored event or subscribe to our publications and newsletters, we collect your information from you when you register, as directed by you during the registration process, as you engage with us and as you participate in activities and forums we provide.

**Representatives of Customers, Suppliers and Prospective Customers and Suppliers.** If you are a representative of an OmniScience customer, supplier or prospective customer or supplier, we collect your information directly from you, your employer, our customers and suppliers and from publicly available websites such as LinkedIn.

**Our products.** When you use our products, we require you to create an account based on your email address. As you use our product we collect device and usage information sent from your web browser to our servers.

## Why We Collect Information and How We Use It

**Websites.** When you visit our websites, we collect your information to help us understand how you interact with us, to provide you with relevant information and services, and to help us to ensure our websites are working as designed. This includes processing personal information as necessary to analyze, improve and optimize the delivery and use of our websites and their security.

**Events and Marketing.** When you register to attend an OmniScience-sponsored event or subscribe to our publications and newsletters, we collect your information to:

- provide you with the experience and information you've registered for or subscribed to;
- inform you of other events or information we believe you may be interested in;
- analyze, improve and promote our events, campaigns, products and services;
- personalize your content and experiences; and
- enable our suppliers, who are also participating in the OmniScience-sponsored event, to contact you about their related products and services.

**Representatives of Customers, Suppliers and Prospective Customers and Suppliers.** If you are a representative of an OmniScience customer, supplier or prospective customer or

supplier, we collect information about you to allow us to provide you with information about us, the products, services and events we offer, and how we may work together. We also use your information to communicate with you to support, facilitate and advance our relationship. Our products. We require you to create an account with your email as your username so that we can provide relevant communications to you and provide the ability to reset your password should you forget it (if you're not using single-sign-on). We collect device and usage information to help us improve our product over time, and find and fix any problems that may be related to specific end devices.

## **Sharing Your Information**

We may share personal information internally and with our subsidiaries and third parties for the following purposes:

- to support the purposes described in the section above entitled "Why We Collect Information and How We Use It";
- to enable third parties to provide services on our behalf;
- to comply with applicable law, legal obligations and valid legal processes such as search warrants, subpoenas, or court orders;
- as necessary to establish, exercise or defend against potential, threatened or actual litigation;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, or investigate or prevent fraud or other illegal activity;
- in connection with a merger, sale or asset transfer; and
- for additional purposes with your consent, where consent is required by law.

When we share your personal information, we will take reasonable steps to ensure that we only share the minimum personal information necessary for the specific purpose and circumstance.

We may provide bulletin boards, blogs, or chat rooms on our websites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums and may be used to send you unsolicited messages. We are not responsible for the personal information you choose to submit in these forums.

We may post lists of customers and testimonials on our websites that contain information such as customer names and titles. We obtain the consent of each customer prior to posting any information on such a list or posting testimonials. To request removal of your personal

information from our blog or forum or to have your testimonials removed, contact us at [privacy@omniscience.bio](mailto:privacy@omniscience.bio).

## **Cookie Notice**

### **Web Sites Covered**

This privacy statement covers the information practices of the Web sites, Products, and Services that link to this Privacy Statement: \*.omniscience.bio. The use of information collected through OmniScience Vivo shall be limited to the purpose of providing the service for which the Customer has engaged OmniScience.

The Company's Web sites may contain links to other web sites. OmniScience is not responsible for the information practices or the content of such other web sites. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any web site you visit.

Our Web site also includes Social Media Features. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy statement of the company providing it.

### **Web Site Navigational Information**

OmniScience uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Web sites ("Web Site Navigational Information"). This section describes the types of Web Site Navigational Information that may be collected on the Company's Web sites and how this information may be used.

### **Cookies and Other Tracking Technologies**

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Technologies such as: cookies, beacons, tags and scripts are used by OmniScience and some of our business partners (e.g., our tracking utility company), affiliates, or analytics or service. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user



base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. Cookies enable us to track and target the interests of our users to enhance the experience on our site.

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features of this site may not work as intended.

#### ***What cookies do we use?***

We only collect strictly necessary cookies. These cookies are essential to enable you to browse around our websites and use their features. Without these cookies, services including user account login and access to video content cannot be provided.

#### **How to control cookies**

You can control and/or delete cookies as you wish – for details, see [aboutcookies.org](http://aboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

#### **Do Not Track**

Currently, various browsers (such as Internet Explorer, Firefox, and Safari) offer a “do not track” or “DNT” option. OmniScience does not currently commit to responding to browsers’ DNT signals with respect to the Company’s Web sites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. OmniScience takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

#### **Retaining Your Information**

Websites. We only keep your information for as long as it is necessary and relevant for the purposes described in this privacy notice. We retain your information for two years only (or as otherwise required by law).



Events and Marketing. We only keep your information for as long as it is necessary and relevant for the purposes described in this privacy notice.

Representatives of Customers, Suppliers and Prospective Customers and Suppliers. We retain your information for as long as your account is active, as needed to provide you services, and as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, or as otherwise reasonably necessary for our business purposes.

Our Products. As part of our products, we keep your information for 10 years after it is no longer professionally relevant for the purposes described in this notice.

## **Your Controls**

We offer you certain controls over your information. These controls may include the right to know what information we hold about you, the right to correct your inaccurate information, the right to delete your information, the right to receive a copy of your information, the right to obtain a list of the specific third parties with whom we may have disclosed your information, the right to limit the use or disclosure of your sensitive information, the right to opt-out of the sale of or use of your information for targeted advertising, and the right not to receive discriminatory treatment for the exercise of your privacy rights.

If you wish to exercise your privacy rights, contact us at [privacy@omniscience.bio](mailto:privacy@omniscience.bio). We will respond to your request in accordance with applicable laws, depending on where you live. In order to process your request, we require certain information about you. We will only use this information to verify your identity and facilitate the processing of your request. We may require you to provide proof of your identity.

You may use an authorized agent to submit a request on your behalf. Authorized agents can submit requests to [privacy@omniscience.bio](mailto:privacy@omniscience.bio). Authorized agents must provide a signed permission or power of attorney to submit requests on behalf of consumers.

There may be times when we are unable to fulfill your request; in those cases, we will let you know why we are unable to fulfill your request. If we deny or are otherwise unable to fulfill your request, you may have the right to appeal by emailing us at [privacy@omniscience.bio](mailto:privacy@omniscience.bio). If we deny your appeal, you may submit a complaint to the attorney general in your state of residence.

To unsubscribe from OmniScience marketing emails, click on the “unsubscribe” link located on the bottom of the email. Please note that customers cannot opt out of receiving transactional emails related to the use of OmniScience’s products and services.

## Children's Privacy

With the exception of appropriately consented clinical trial data, we do not knowingly collect any information from children under the age of 18 as part of our websites or products.

If you believe we may have mistakenly collected the personal information of a minor without appropriate consent, please contact us at [privacy@omniscience.bio](mailto:privacy@omniscience.bio) and we will investigate and promptly address the issue.

## Security

We maintain a privacy and security program with technical, physical and organizational safeguards designed to protect against the wrongful access, use or disclosure of personal information, and to provide a level of security which we believe is appropriate to the risk our processing of your personal information poses to your privacy. We regularly review and modify our security measures to reflect changing technology, laws and regulations, risk, industry and security practices and other business needs. If you have questions about our security program, please contact us at [security@omniscience.bio](mailto:security@omniscience.bio).

## Transfer of Personal Information Between Countries

OmniScience is a global company, and as such, we may transfer your personal information to various locations around the world for the purposes described in this privacy notice. We apply the protections and limitations described in this privacy notice regardless of where we process your personal information.

We also comply with various legal frameworks that enable the cross-border transfer of personal information. Where required, we rely on transfer mechanisms that lawfully support data transfer to other jurisdictions, such as Standard Contractual Clauses, "adequacy" determinations, obtaining your consent or another recognized transfer mechanism.

We may transfer your personal information to third-party service providers (agents) for various purposes, such as data processing or cloud storage. If we do so, we remain responsible for ensuring these agents comply with our data protection standards. If an agent processes your information in a way that violates these standards, and we cannot demonstrate that we are not responsible for the violation, we will be liable. We will also require our agents to agree to our data protection standards in writing. We will provide you with notice about the types of third parties we share your information with and offer you choices about how your information is used and disclosed.

## Data Privacy Framework

OmniScience complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. OmniScience has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. OmniScience has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, OmniScience commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/DPF-Dispute-Resolution> for more information or to file a complaint. The services of [INSERT name of alternative dispute resolution provider] are provided at no cost to you.

The DPF applies to European, Swiss and UK individuals whose personal information is transferred to the United States. In compliance with the DPF, we allow these individuals the opportunity to choose (through an opt-out mechanism) whether their personal information is to be disclosed to a third party or used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized. The “Your Controls” section provides more information about these rights and the mechanisms we provide to exercise them. If we collect sensitive personal information on these individuals, we will obtain explicit consent before disclosing sensitive personal information to a third party or using it for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized.

If you have questions or concerns regarding our handling of your personal information under the DPF or about our privacy program generally, please contact us at [privacy@omniscience.bio](mailto:privacy@omniscience.bio). If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you may be able to pursue binding arbitration; visit the Data Privacy Framework Program website for more information about how to submit a complaint.

The Federal Trade Commission has jurisdiction over our compliance with the EU-U.S. DPF, the UK Extension, and the Swiss-U.S. DPF. We remain responsible for personal information that we transfer to third parties for processing on our behalf. We may be required to disclose personal information that we handle under the DPF in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **Transparency**

### **OmniScience's Government Access Request Policy**

This Government Access Request Policy describes how we respond to requests from governmental and other public authorities (collectively, "Government Authorities") for access to Customer Data (as defined in our customer agreements) or other personal information (collectively, "Data").

**Validity.** We do not voluntarily disclose Data to Government Authorities. We only disclose Data where there is a valid legal basis to do so (such as through a warrant, subpoena or court order). We review all requests on a case-by-case basis and in accordance with applicable law. If we determine there is a valid legal basis for the request, we comply by providing the least amount of Data necessary to respond to the request.

We never create backdoors in our products or services to allow Government Authorities to access Data.

**Challenges.** We challenge requests if we believe:

- there is no valid legal basis for it,
- the request is unlawful,
- the request is unclear, overly broad or inappropriate, or
- where compliance with the request would put us in potential breach of applicable laws in another country.

**Notification.** We notify our customers if a Government Authority requests their Data unless we are legally prohibited from doing so, in the event of an emergency (such as to prevent

imminent death or serious physical harm to an individual) or in cases where we reasonably believe such notice would be counterproductive.

Transparency Report. We publish a report of requests we have received and our response to them. We update this report semi-annually.

Type of Request	Country of Origin of the Request	Action Taken	Year

## OmniScience Customers

The personal information that we process on behalf of and to provide products and services to our customers, including when customer representatives are users of our products and services, is subject to the terms and conditions of our customer agreements.

Where requested, we offer a Data Processing Addendum and Standard Contractual Clauses\_ to enable our customers to comply with data protection laws applicable to our processing of personal information on their behalf. We process, transfer and maintain customer personal information strictly in accordance with our customer agreements and applicable law.

If you are interested in learning about our customers' use of your personal information, we encourage you to contact the customer. We cooperate with our customers if they need our assistance in fulfilling requests from individuals to exercise their data privacy rights.

If you have questions about our security program, please contact us at [security@omniscience.bio](mailto:security@omniscience.bio).

## Changes to this Privacy Notice

From time-to-time, we may change our privacy notice to reflect changing technology, laws, regulations, risk, industry and security practices and other business needs. The most up-to-date version will be found on this website; we post its effective date at the top. If we make a material update, we may notify you by posting notice on our website or by other means, consistent with applicable law.

## Contact Us

If you wish to exercise your privacy rights, please contact us at [privacy@omniscience.bio](mailto:privacy@omniscience.bio).

If you have any questions about our privacy practices, you can contact our Chief Technology Officer & Data Protection Officer, Colin Hendricks ([colin.hendricks@omniscience.bio](mailto:colin.hendricks@omniscience.bio)).

## **Residents of the EU, UK, and Switzerland**

Representatives of Customers, Suppliers and Prospective Customers and Suppliers. The legal basis for processing personal information about representatives of our existing and potential customers and suppliers is our legitimate interest in supporting our existing or potential business relationship with such customer or supplier.

Websites. The legal basis for processing internet protocol addresses is our legitimate interest in providing the OmniScience website. The legal basis for the processing of usage data is your consent. If data is collected from you on the basis of consent, we will indicate whether the data in question is required or voluntary information.

Events and Marketing. The legal basis for processing our events and marketing information is that the processing is necessary for the performance of a contract with you or is otherwise processed with your consent.

Our Products. The legal basis for processing personal information as part of our products is our legitimate interest in providing enhanced clinical trial oversight to clinical trial sponsors to reduce study cost, accelerate timelines, and improve outcomes.

## **Contact Us**

If you have any questions about our privacy practices, you can contact our Data Protection Officer at [privacy@omniscience.bio](mailto:privacy@omniscience.bio).