

StudyTeam

Privacy Policy

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StudyTeam Privacy Policy

Your access to, and use of, any Site or Service is subject to the applicable Terms of Service of Reify Health, Inc., on behalf of itself and its subsidiaries and affiliates (collectively, “Reify”, “we”, “us”, or “our”). This Privacy Policy (“Privacy Policy”) is incorporated into and made part of our Terms of Service. All capitalized terms used but not defined herein have the meanings given to them in our Terms of Service. This Privacy Policy describes Reify’s treatment of information, including personally identifiable information (“Personal Information”), that Reify collects in connection with your access or use of any Site or Service and all other data and content that is accessed, utilized, input, or generated in connection with any Site or Service. By accessing or using any Site or Service, you consent to the collection, use and disclosure of your information, including, but not limited to, Personal Information, in accordance with this Privacy Policy.

What Types of Personal Information Does Reify Gather?

Services may include programs such as StudyTeam in which users with access to Restricted Areas of Reify’s Sites (each, a “Registered User”) communicate information about clinical research needs and capabilities and monitor and manage the performance of clinical research activities. Reify may collect any information provided or input by you or authorized by you to be provided by a third party in connection with any Site or Service, which information may include, but is not limited to, your name, email and physical address, and telephone number. We collect information from you when you use Sites or Services, when you fill out a form, upload information, create or use an account, or otherwise supply information to us. When you send email or other communications to us, we may retain and use those communications in order to process your inquiries, respond to your requests, and improve our services.

We may also automatically collect information regarding your interaction with, and use of, any Site or Service. We may use a variety of methods to collect this information, including, but not limited to, cookies, pixel tags, Web beacons, embedded Web links and other commonly used information gathering tools (“Automatic Data Collection Tools”). These Automatic Data Collection Tools collect certain standard information that your browser sends to us such as your browser type and language, access times, IP address, user-agent string and click stream behavior. You may have the ability, through your Internet browser settings, to receive notices regarding, or turn off, certain Automatic Data Collection Tools; however, please note that turning off Automatic Data Collection Tools may negatively impact the functionality or performance of the Sites and Services.

Information may be collected by us or by our vendors who provide internet hosting for the Sites or Services. We may combine information you give us with other information from Reify sources, transactions and communications. We may also combine that information with data that is publicly available and data from third parties.

Because there is not yet a common understanding of how to interpret web browser-based “Do Not Track” (“DNT”) signals other than cookies, we do not currently respond to undefined DNT signals to any Site or Service.

How Does Reify Use Your Personal Information?

We use Personal Information to facilitate your use and receipt of the Sites and Services, and any products or services related thereto, and as further described in this Privacy Policy. We may use Personal

Information to: allow you to participate in a Service; to deliver the Sites and Services, which may require us to share some Personal Information with a third party or contractor we use to deliver such Site or Service; and to provide you with important information about Reify or the Sites and Services, including critical updates and notifications.

Facilitate Your Use of the Sites and Services. We may use your Personal Information to communicate with you regarding the Sites or Services, your account information or other customer service matters; to respond to your questions and instructions; and to enhance, customize, and personalize your experiences and communications with us.

Operate and Improve the Sites and Services. We may use your Personal Information to operate, provide, improve and maintain the Sites and Services, including analyzing User behavior and trends; to send you administrative messages and other information about Reify and the Sites and Services; to investigate or take action regarding violations or suspected violations of applicable law or our Terms of Service; and to maintain the integrity of the Sites and Services and our network and address security issues.

Marketing and Promotion Purposes. We may use your Personal Information to communicate with you about the Sites and Services and other related products and services; and display relevant marketing to you.

Special Circumstances. We may also access, use, copy or disclose Personal Information in the event of any Special Circumstances (as described below).

Aggregated Data. Information collected from any source may be combined to provide or improve the Sites and Services and facilitate more targeted, tailored communications. We may aggregate deidentified data and information collected about you and other Registered Users of any Site or Service to create anonymous aggregated data ("Aggregated Data"). Reify shall solely own all rights in and to any Aggregated Data, and has the irrevocable right to maintain, store, use, disclose or sell such Aggregated Data. Reify may use Aggregated Data for its internal purposes, including, but not limited to, research and analysis purposes, to ascertain trends and security/privacy patterns, internal record keeping and reporting purposes, to perform statistical analyses, and for our other business purposes.

With Whom Does Reify Share Your Personal Information?

We may provide your Personal Information to our subsidiaries and affiliates (the "Reify Companies"). Unless not permitted by applicable law, all companies within the Reify Companies may share Personal Information collected through any Site or Service and may contact you directly.

We do not sell, trade, or otherwise transfer to outside parties your Personal Information unless we provide you with advance notice and obtain your prior consent, except as described herein. The term "outside parties" does not include Reify Companies, our website hosting partners, and other parties who assist us with the administration of the Sites or Services, conducting our business, or servicing you, so long as those parties agree to maintain reasonable security measures to safeguard the confidentiality, security, and integrity of your Personal Information. Outside parties may have access to Personal Information as reasonably necessary to perform their functions.

We may disclose Personal Information when we believe disclosure is appropriate to comply with applicable law; enforce or apply this Privacy Policy or other agreements to which we are a party or which are related to

any Site or Service; or protect the rights, property or safety of our company, our Registered Users or others (collectively, "Special Circumstances"). Special Circumstances include exchanging information with other companies and organizations for fraud protection and credit risk reduction.

If our company is acquired by or merged with or into another entity, or if our assets or business is sold or transferred to another entity, your Personal Information may be transferred to such entity as part of the transaction, and that entity and its affiliates may use your Personal Information under the terms of their own privacy policies which may differ from this Privacy Policy.

Data Retention

We may store and use your Personal Information for as long as you continue to access or use any Site or Service and thereafter in accordance with this Privacy Policy. Reify Health may retain your Personal Information indefinitely for the purposes of audits and review in the course of providing the Services and for the substantiation of other data in the system.

Information Security

Information security is important to Reify. We follow generally accepted industry security standards to safeguard and help prevent unauthorized access, maintain data security and correctly use your Personal Information. However, like other companies, Reify cannot guarantee the 100% security or confidentiality of your Personal Information. Consequently, while we endeavor to safeguard your Personal Information against unauthorized access and disclosure, we do not warrant or guarantee the absolute security of any Personal Information you transmit to, from or through any Site or Service. In the event that we become aware of a security breach involving your Personal Information stored by or for us, we may notify you by posting details of the breach to the applicable Site or Service or via email, to the extent available in connection with such Site or Service. We will provide you with a copy of our **StudyTeam Security Overview** upon request. You should be aware that Reify has no control over the security of other sites on the Internet that you might visit or interact with even when a link to any such third party site appears on any Site or Service. In addition, Reify does not control or continuously monitor the activities of users of any Site or Service, and such users may have the ability to provide, access, use and/or disclose data and information, such as your Personal Information, in connection with the Sites and Services.

Please note that some of the content we deliver to or receive from you through the Sites and Services, specifically that of emails and text messages, is unencrypted. And so, transmissions may be unknowingly or unintentionally intercepted by third parties. We do not maintain or have access to your device, phone, e-mail server, or networks outside of our domain and control; therefore, we bear no liability or responsibility for the security or control of content or communications, once delivered to you.

Third Party Privacy Policies

Once you leave a Site or Service, whether independently or via links, the privacy policies of the websites to which you migrate will apply. This Privacy Policy applies solely to your interactions with, and information collected through, the Sites and Services.

International Users

Our operations are conducted within the United States. Regardless of where you live, you consent to have your Personal Information transferred, processed and stored in the United States, and allow Reify to use and collect your Personal Information in accordance with this Privacy Policy. Please note that the Sites and Services are not intended for use by a person in any state or country where such use would be contrary to any applicable laws or regulations.

International Users: If you access any Site or Service outside the United States, your connection may be through and to servers located in your country or the United States. Any Personal Information you provide may be processed and maintained in the United States on servers or other network systems operated by or for Reify's benefit. IF THE JURISDICTION IN WHICH YOU ARE LOCATED OR YOUR COUNTRY OF ORIGIN HAS LAWS OR REGULATIONS WHICH REQUIRE THAT YOUR PERSONAL INFORMATION BE RECEIVED, USED, SAVED, TRANSFERRED OR OTHERWISE HANDLED IN A MANNER DIFFERENT THAN AS STATED IN THESE THIS PRIVACY POLICY, THEN YOU ARE NOT AUTHORIZED TO UTILIZE ANY SITE OR SERVICE. If you access any Site or Service from or reside outside of the United States, your information may be stored, transmitted and shared in accordance with U.S. data privacy laws, which may not be equivalent to those in effect in your country. YOU EXPRESSLY AGREE THAT YOU WILL NOT USE ANY SITE OR SERVICE WITH ANY EXPECTATION OF GREATER PRIVACY RIGHTS THAN THOSE TO WHICH YOU HAVE EXPRESSLY AGREED AS STATED IN THIS PRIVACY POLICY.

Notice to California Residents

In addition to the other rights described in this Privacy Policy, if you are a customer residing in California, you have the right to request information regarding the third parties with whom Reify has shared customer Personal Information for direct marketing purposes during the past year. You have the right to submit a request to Reify and receive the following information within 30 days of its receipt of that request: (1) the types of Personal Information disclosed to third parties during the immediately preceding calendar year, (2) the names and addresses of third parties that received the Personal Information, and (3) if the nature of a third party's business cannot be reasonably determined from the third party's name, examples of its products or services. You are entitled to receive a copy of this information in a standardized format. Information provided will not be specific to you individually. All such requests must be in writing and sent to Reify's designated address set forth in the "Contact Us" Section.

Children's Privacy

The privacy of children is important to Reify. The Sites and Services are not directed at children, and we do not knowingly collect Personal Information from children under the age of 13 through the Sites and Services. Children under the age of 13 may not access, use or submit any Personal Information through any Site or Service.

By using any Site or Service, you hereby represent that you are at least the age of legal majority in your place of residence or have otherwise provided us with parental consent. All information provided to Reify will be treated as if provided by an adult. If a child has provided us with Personal Information, a parent or guardian of that child may send an e-mail to business@reifyhealth.com with "Request for Child Information Removal" on the subject line and the name and age of the child in the body of the message. Upon verification, we will remove the child's Personal Information from our applicable databases.

Changes

We may update this Privacy Policy from time to time without prior notice. Any changes to our Privacy Policy will become effective upon posting of the updated Privacy Policy on our website located at http://docs.reifyhealth.com/StudyTeam/StudyTeam_Privacy_Policy.pdf. If we change this Privacy Policy, we will revise the “last modified” date at the bottom of this Policy. For material changes to this Privacy Policy, we will notify you by placing a notice on Reify’s log-in page(s) or the home page of Reify, or by sending you a notification directly. We encourage you to bookmark our Internet sites and to periodically review them to ensure familiarity with the most current version of our Privacy Policy. We may ask you to affirmatively acknowledge consent to any changes to this Policy (e.g., by checking a box or clicking a button).

Contact Us

If you have any questions, comments or requests regarding this Privacy Policy, please contact the Reify Health Privacy Officer at:

Reify Health, Inc.
Attn: Privacy Officer
745 Atlantic Avenue
Boston, MA 02111
Email: privacyofficer@reifyhealth.com

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