

# Compliance Audit Partners, LLC Privacy Notice Last updated 18 December 2018

## Overview

Compliance Audit Partners, LLC, ("CAP") provides expert support to pharmaceutical companies around the world. We at CAP strive to be industry leaders in data privacy and protection. This Privacy Notice aims to inform you about how we collect, use, disclose and store your personal information.

If you have any questions or concerns about this Privacy Notice, please contact us at reach.us@compauditpartners.com.

# Your data protection rights

Depending on your location, under data protection law you may have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

**Your right to opt-out or object** – You have the right to opt-out or object to our use of your personal information when our use is based on your previous consent or our legitimate interests.

In addition, we will not discriminate against any individual who exercises these rights.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at <u>reach.us@compauditpartners.com</u> if you wish to make a request.



# Types of personal information we collect

We currently may collect and process the following information:

- your name and contact information, including email address, phone number, employer's name, job title, and mailing address whether received in person or electronic means;
- resume and CV submissions via compauditpartners.com;
- email communications with CAP;
- a registration form when you register for a webcast event;
- your responses to any surveys or requests for feedback you may choose to participate in; and,
- personal information provided in order for us to provide professional services to our clients.

#### How we get the information and why we have it

Most of the personal information we process is provided to us directly by you so that we can provide you with professional services, information about our professional services, to consider your qualifications for employment by CAP, and to provide you with any news or informational posts which you have requested. We also receive personal information in the course of providing our services to clients.

No matter the source of the information, we rely on of the following lawful basis for processing this information:

**Your consent.** If you have submitted your resume or CV by online submission or if you have opted-in to any of our promotion or informational services we will use your consent as the basis for processing your information. You are able to remove your consent at any time through the "unsubscribe" link in the email or by contacting us directly at reach.us@compauditpartners.com.

We have a contractual obligation. This is processing necessary to enter in to or provide contractual services with you.

We have a legal obligation. This is processing necessary for us to comply with a legal obligation.

We have a vital interest. This is any processing necessary in your vital interest.

We have a legitimate interest. This is information we process for the legitimate interest of our organization or a third party that is not outweighed by any negative affects to your interests, rights or freedoms.

#### What we do with the information we have

We do not rent or sell your personal information to other organizations, ever.



We use the information that you have given us in order to provide you with professional and educational resources, contact and interact with you upon request or to provide important information, and to effectively operate our business.

### How we store your information

We comply with all applicable data protection and privacy laws and use a variety of security procedures and technologies to protect your personal information for any unauthorized access, use, disclosure, alteration or destruction.

Most of the personal information we use is processed in a secured cloud location in the United States. We ensure we have a written agreement with our trusted service providers requiring them to treat your personal information in the same way we do.

Depending on your location your data may be transferred from your country to our secured location. We ensure trusted service providers have all appropriate measures in place for international data transfers before storing your information. These measures include, but are not limited to, Binding Corporate Rules, APEC Cross Border Privacy Rules System, EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield. If you would like more information on any of these security measures or have concerns please contact us at reach.us@compauditpartners.com.

#### How long we keep your personal information

We will always keep your personal information for the period required by law and where we need to do so in connection with legal action or an investigation involving CAP. Otherwise, we keep your personal information for a reasonable amount of time to provide you with the services you have requested.

#### Websites we do not own or control

This Privacy Notice applies only to information collected by CAP. From time to time we may provide links to websites or mobile applications that are not owned or controlled by us. This Privacy Notice does not apply to those websites. If you choose to use those websites, we encourage you to check the legal and privacy statements posted on each website or mobile application you access to understand their privacy practices.

## How to file a Complaint

Depending on your location, you may make complaints in the following ways.

If you have concerns about how we handle your personal information, you have the right to make a complaint about us to the UK Information Commissioner's Office (ICO) at <u>www.ico.org.uk</u>.



You may also contact the privacy regulator in your country. Most privacy regulators can be contacted online using the resources provided at <u>https://icdppc.org/participation-in-the-conference/members-online/</u>.

You may always contact us directly with comments or complaints at reach.us@compauditpartners.com.

# **Changes to this Policy**

We may make changes to this Privacy Notice from time to time based on changes to applicable laws and regulations or other requirements applicable to us, changes in technology, or changes to our business. Any changes we make to the Policy in the future will be posted on this page and indicated by the "last updated" date on the Privacy Notice.