

ST PANCRAS CLINICAL RESEARCH POLICY

St Pancras Clinical Research Limited (SPCR) provides clinical trial and patient recruitment services for global pharmaceutical companies and clinical research organisations.

This policy sets out how the company uses and protects the information you provide when you: access the St Pancras Clinical Research website and Social Media sites; contact us directly by telephone; or, visit our London clinic. We will only collect personal data from you if you choose to register an interest in taking part in our clinical trials and consent to your data being held on our confidential database. Strict confidentiality is assured at all stages of your contact with us.

SPCR operates under the international ethical guidelines and regulatory framework for medical research known as GCP (Good Clinical Practice).

“The rights, safety and well-being of trial subjects (patients) are the most important consideration and should prevail over the interest of science and society”.

Helsinki Declaration (1975, First Revision). Item 2.3 International C H Guidelines for Good Clinical Practice.

SPCR will hold your details in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679), enacted in the UK as the Data Protection Act 2018. SPCR is registered as data controller with the Information Commissioner’s Office for Data Protection (Registered Data Controller Number: ZA202021).

The policy sets out your rights to:

- Understand what data is held, why and how we process it;
- Understand the conditions of consent about how we seek, record and manage consent, including opt-in;
- Access your data;
- Rectify the data to ensure the quality of data held;
- Control retention & disposal of your data;
- Restrict processing of your data;
- Data portability - where you have supplied data to SPCR (the data controller) after consent; and,
- Object to SPCR holding your data and withdrawal of consent.

To protect your privacy, we uphold the following principles:

AUTHORISED VERSION: ORIGINAL FOR EXTERNAL USE (VERSION 1.0)

1-6

Phone: +44 (0) 203 8651142

Web: www.stpancrasclinicalresearch.com

Registered in England No: 10099653

Registered Office: 285-287 Gray's Inn Road, London WC1X 8QD, UK.

©St Pancras Clinical Research Ltd. 2018.

- we do not collect more information than is necessary;
- we do not use your data for purposes other than those specified;
- we do not keep your data if it is no longer needed; and,
- we only provide your data to select third party clients for the specific purposes listed below.

This Policy is effective from March 2018.

1. INFORMATION COLLECTION & USE

1.1 When you visit our website

The site www.stpancrasclinicalresearch.com is owned and operated by St Pancras Clinical Research Ltd. SPCR is the data controller for the purpose of the Data Protection Act 2018.

This policy together with any other documents referred to in it sets out the basis on which any personal information that we collect from you, or that you provide to us, will be used and protected by us.

You can visit our website without giving away your personal information. If you do not agree to our processing of your data in the manner set out below, please do not submit any personal data to us.

Our website aggregates information on how it is used but does not collect any personally identifiable data during this process.

Strict confidentiality is assured at all stages of your contact with us.

1.2 How we use the data

The data we request from you could be personal contact details such as telephone number or email address, your preference for how we may contact you, or medical and family history; although this list is not exhaustive.

If you decide to register your interest with us and consent to fill out a form online or over-the-phone, the personal data collected from you will be held electronically on our confidential database, only if you opt-in to your data being held.

This information will only be used by SPCR authorised persons and will not be passed on to any third parties, unless it is necessary (for example, your address may be given to the taxi driver who is bringing you to our clinic). Any information disclosed will be solely for the purpose of carrying-out a trial, and this would be on a need-to-know basis.

If you continue your interest in taking part in a study, the pharmaceutical company running the clinical trial will only have access to your sex, date of birth, initials, and randomised subject number (this number is assigned to you if you decide to take part in a trial so that you remain anonymous). Further personal information, beyond that available from your online forms or over-the-phone conversation with our staff, will be collected only with your verbal consent. We will also ask you to sign a consent form on your first visit to our London clinic to allow us to hold your details and contact your GP to obtain a copy of your confidential medical records.

SPCR uses the information gathered to respond to your enquiry, inform you about suitable upcoming clinical trials that may be of interest to you, arrange appointments to attend our clinic, and periodically to send promotional communications about upcoming clinical trials. With your permission, SPCR may also contact you to participate in patient insight surveys to help us improve our services.

The information you fill in (personal information such as your name, email address, your phone number) will be processed and stored so that it is possible for us to contact and respond to your request, and/or allow you access to our services.

1.3 When you submit a CV to us for a job application

If you apply for a job with SPCR, we will collect, process and store the information you have sent us for recruitment-related purposes, such as contacting you. The personal data you give us will be collated with additional data obtained from publicly available data, data from interactions with you and with related third parties. Additionally, SPCR may ask you at the end of an interview if we might keep your data for a period of time for the purpose of considering you for a different opportunity.

2. INFORMATION SECURITY

SPCR seeks to ensure the security of personal data. When SPCR collects information about you, we also make sure that your information is protected from unauthorized access, loss, manipulation, falsification, destruction or unauthorized disclosure. This is done through appropriate technical and organisational measures.

Where patient information is archived at the end of a trial for a 25-year retention period, SPCR does so in secure off-site storage managed by a Third Party. We ensure that all such Vendors have measures in place to be GDPR compliant.

3. YOUR ACCESS TO INFORMATION

AUTHORISED VERSION: ORIGINAL FOR EXTERNAL USE (VERSION 1.0)

3-6

Phone: +44 (0) 203 8651142

Web: www.stpancrasclinicalresearch.com

Registered in England No: 10099653

Registered Office: 285-287 Gray's Inn Road, London WC1X 8QD, UK.

©St Pancras Clinical Research Ltd. 2018.

You, or someone you authorise to act on your behalf, have the right to request access to the data/information that we hold about you. You can do this by contacting us at patientcare@stpancrasclinical.com. We will send you a **Data Subject Access Request Form**. Please complete this form if you wish to see your data. You will also need to provide **proof of your identity**. Your request will be processed within 30 calendar days upon receipt of a fully completed form and proof of identity.

We will fulfil your request by sending a copy of your information electronically, unless the request expressly specifies a different method.

Our policy is not to charge for the first Data Subject Access Request. Any consecutive requests may be subject to an administrative fee.

4. INFORMATION CORRECTION & DELETION

If you believe that the information we have about you is incorrect, you are welcome to contact us so that we can update it and keep your data accurate. Any data that is no longer needed for the purposes specified in Information Collection and Use will be deleted.

If you choose to leave our confidential SPCR database, please simply contact our Patient Engagement Team using the Contact Us page on our website (www.stpancrasclinicalresearch.com) or email us at patientcare@stpancrasclinical.com. We will then remove your personal information and contact details from our database and we will not contact you again.

5. WHEN THIS PRIVACY POLICY APPLIES

This Privacy Policy is applicable when you:

- **access the St Pancras Clinical Research website and Social Media sites;**
- **contact us directly by telephone; or,**
- **visit our London clinic.**

Our website may contain links to other websites. Once redirected to another website, this Policy is no longer applicable.

The purposes for which we hold and process data include:

- Inclusion on the confidential SPCR database;
- Inclusion on specific clinical trials; and,

- Employee data.

6. CHANGES

We reserve the right to change this Privacy Policy and any changes will be notified on our website. We constantly review our Privacy Policy and strive for continuous improvement in our data protection for patients, potential patients and employees.

7. SUMMARY

St Pancras Clinical Research will retain the information provided and only share the information with those it is legally entitled to. The information will only be kept for as long as necessary and will be disposed of in a safe and secure manner in accordance with SPCR's retention policy.

We do not use profiling, we do not sell or in any other way disseminate your data to third parties, and we do not use your data for purposes other than what we have specified.

We also make sure that your data is stored securely. We delete all information deemed no longer necessary.

We constantly review our Privacy Policy to improve it and enhance the protection of your data.

8. YOUR RIGHTS

You can contact us at any time to:

- Request access to the information that SPCR holds about you;
- Correct any of the information; and,
- Delete any of the information.

9. CONTACT DETAILS

If you have any additional questions about our collection and storage of data, please contact us at:

285-287 Gray's Inn Rd

AUTHORISED VERSION: ORIGINAL FOR EXTERNAL USE (VERSION 1.0)

5-6

Phone: +44 (0) 203 8651142

Web: www.stpancrasclinicalresearch.com

Registered in England No: 10099653

Registered Office: 285-287 Gray's Inn Road, London WC1X 8QD, UK.

©St Pancras Clinical Research Ltd. 2018.

London WC1X 8QD

+44 (0) 203 865 1142

patientcare@stpancrasclinical.com

Data Protection Officer: dorothyharris@stpancrasclinical.com

DO NOT COPY

AUTHORISED VERSION: ORIGINAL FOR EXTERNAL USE (VERSION 1.0)

6-6

Phone: +44 (0) 203 8651142

Web: www.stpancrasclinicalresearch.com

Registered in England No: 10099653

Registered Office: 285-287 Gray's Inn Road, London WC1X 8QD, UK.

©St Pancras Clinical Research Ltd. 2018.