

PRA PRIVACY NOTICE

At PRA, we are committed to protecting your privacy. This notice explains how we collect, use, and protect personal information that we obtain through your use of our corporate websites and other online services. Personal information means information that identifies an individual or relates to an identifiable individual.

PRA is responsible for controlling and processing the personal information it obtains. Our postal address is:

Pharmaceutical Research Associates Inc.
4130 ParkLake Avenue, Suite 400
Raleigh, North Carolina 27612 USA

Our Privacy Officer can be contacted at: privacyofficer@prahs.com.

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Scope of Applicability

This privacy notice applies to prahs.com and other websites or online services, including our portals, that are operated by or on behalf of PRA and its affiliates and that link or refer to this notice (the "Services").

We may provide a separate supplemental notice when we collect personal information through the Services, because it will give you further relevant information about that processing.

This notice does not apply to personal information that is collected offline, or through websites or other online services unless they are linked to or refer to this notice.

Personal Information We Collect, How We Collect It, and Why.

The personal information we collect and how we use it, depends on the context of your interactions with PRA, the choices you make, and the Services and features you use.

You provide this personal information directly when you submit inquiry forms, subscribe to receive topical materials and newsletters; inquire about our services or capabilities; apply to participate in our clinical research studies as an investigator or study volunteer; or apply for a job with PRA. You may choose not to provide personal information, but in not doing so, we may be unable to complete your request.

We collect a certain amount of technical information from our website users about your access and how you interact with the Services. We use this information to improve your experience, and help us to manage and protect the Services.

Inquiries, Subscriptions, Marketing Materials and Resource Requests

The personal information provided in online inquiry forms that you submit and subscriptions that you set up with us or your registration for Services we offer, which may include your name, email address, business title, company name, address, telephone number and other similar information.

We use this personal information to provide you with the information or Services you have requested. As appropriate to your request, we include your personal information in our

contact database to send you communications and marketing materials. You may unsubscribe from receiving these communications at any time using the link in emails we send.

Investigator Registration

You may use the Services to register your interest as an investigator for clinical research studies by submitting an investigator registration form. We collect relevant personal information which may include your name, email address, business title, company name, address, telephone number, as well as information about your professional qualifications, interests, research experience, and other similar information.

We store this personal information in our investigator database and use it to contact investigators for their interest in upcoming clinical research studies. If you would like us to include your details for future studies, please register with us.

Volunteer Study Participation

If you are interested in taking part in a clinical research study as a volunteer, you may use the Services to submit an online application form. The personal information we collect may include your name, gender, date of birth, postal address, email address, telephone number, preferred clinic location, the best time to contact you and other similar information. We also ask you to identify any studies that are of particular interest to you. The volunteer facility that receives your application will contact you to discuss your application.

Refer-a-Friend/Volunteer-Recruit-Volunteer Program

In this program, we collect information that you provide about your friends or family members who may be interested in volunteering in our clinical research studies. You must register with us to receive a unique ID to link you to any successful referrals you make. The personal information we collect from each friend or family member is the same as listed in the Volunteers Study Participation section above. We use the referral information you provide to contact them about volunteering.

Careers and Recruitment

When you apply for a job directly with PRA we collect personal information which may include your name, email address, mailing address, telephone number and other similar information. We also collect information about your work experience and educational

background on your resume or curriculum vitae, your eligibility to work and any accommodations you need in the recruiting process because of a medical condition or disability, and other similar information that may be relevant to your application and the position you are seeking. We use your personal information to communicate with you and conduct the recruitment and selection process. We also advertise roles for our Strategic Solutions Division where you can be fully embedded in one of our pharmaceutical clients. If the role you apply for is one of these, your personal information will be shared externally with that client as an integral part of the recruitment process.

If you create a job candidate profile from an existing profile on an external social account such as on Facebook, Google+, LinkedIn or Microsoft, PRA may collect relevant content from those websites or other published information to build your PRA candidate profile.

If you register with external recruitment agencies, they may send us your job candidate profile in response to vacant positions PRA has posted. PRA also subscribes to Job Boards including Indeed, Pharmiweb and StepStone for access to candidate profiles that individuals have set up under the operating terms of the respective Job Board. If we are provided with your personal information from these external parties, we will upload your profile details into our recruitment database to progress our selection process and pre-employment steps, as appropriate. Personal information in our recruitment database may be used to contact you about future employment opportunities in which we think you may be interested. We use your personal information to periodically keep in touch with you and to ensure we retain up-to-date personal information. You can use these periodic communications to tell us about changes and updates.

Automatically-Collected Technical Information

We automatically receive certain technical information from you as you interact with the Services. This information includes network routing information (where you came from), information about your device and browser, your IP address (which may identify your general geographic location or company), and the date and time of your visit.

We also automatically receive and record information about your interactions with the Services, such as clickstream information (e.g., when each webpage was visited and how much time was spent on the page), how often you access the Services, website performance data, and aggregate usage data.

We use this information to administer and maintain the Services, to understand how visitors navigate and use the Services so that we can make improvements to the Services, and to personalize and enhance your experience while using the Services.

We also use this information to protect the security and integrity of the Services.

For more information, please see the “Cookies and Similar Technologies” section below.

How We Share Personal Information

- We do not rent or sell your personal information to anyone for monetary compensation.
- In the course of our business operations and where required, we share your personal information with relevant PRA staff in subsidiary companies within our Group.
- We share your personal information with selected third parties relating to your interaction with us.
- We also share certain information with service providers that carry out functions or services on our behalf that enable our business operations, including the protection and securing of our systems and services.
- We share your personal information where required by applicable laws and regulations.
- We share your personal information with your consent; as necessary to complete any contract, transaction, action authorized by you or to fulfill your request.
- We share your personal information with website analytics and search engine providers.

When we share your personal information in specified circumstances:

PRA Group Companies

We may share your personal information with PRA affiliates. All of our group companies must adhere to our privacy and data-security requirements.

Third-Party Service Providers

We share your personal information with third-party vendors, consultants, and other service providers who we engage to perform tasks on our behalf. They must abide by our privacy

and data-security requirements and are not allowed to use personal data they receive from us for any other purpose.

Client Sponsors of Clinical Research Studies

If you apply to participate in a clinical research study as an investigator, we may share your personal information with our client sponsors whose clinical research studies are within your stated area of interest as part of the contracted services that we provide to them.

Corporate Transactions

As part of, or during negotiations of, any merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including as part of any bankruptcy or similar proceedings), we may transfer your personal information to other parties involved in these transactions. Under these circumstances, all parties have entered into a confidentiality agreement and are obligated to protect any information provided as part of the transaction.

Disclosures of Non-Identifiable Information

When we collect information that is not personal information or convert personal information into information which can no longer be used to identify you (such as through aggregation or anonymization), we may use and disclose that information for any purpose.

Disclosures to Protect PRA or to Comply with Legal Requirements

PRA may access, use, and disclose your personal information as we believe, in our sole discretion, is necessary or appropriate:

- to comply with applicable laws or regulations;
- to respond to valid legal process, including from law enforcement or other government agencies;
- to maintain the security and integrity of the Services, including to prevent or stop an attack on our computer systems or networks; or
- to protect the rights or property of PRA, including enforcing the terms governing the use of our Services and referring to law enforcement information suggesting that someone is using our Services to participate in illegal activity.

Cookies and Similar Technologies

Our Services use cookies (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons, tags, and scripts) to provide the Services and to help collect information that we use to administer the Services, to analyze your use of the Services, and to assist with our promotional and marketing efforts.

Cookies

PRA uses cookies—pieces of information that our web server sends to your computer when you access the Services. Cookies may collect information that includes a unique identifier, user preferences, and statistical information about the nature and volume of usage of the Services.

Some features and functions of the Services depend on cookies. If you choose to block cookies, you may not be able to use these features, and preferences that depend on cookies may be lost. If you choose to delete cookies, settings, and preferences controlled by those cookies will be deleted and may need to be recreated.

You may manage cookies at any time through your browser settings. To find out how to manage cookies, visit www.aboutcookies.org, then select “How to Control/Delete Cookies” and follow the instructions for your browser and follow the instructions for your browser or click this: [Cookie Preferences](#).

Web Beacons, Social Media Enablement and Analytics Services

The Services may contain electronic images known as web beacons (also called single-pixel gifs or web bugs) that PRA uses to help deliver cookies on our websites, count users who have visited those websites, and analyze the usage of the Services.

The Services may also contain web beacons or similar technologies from third-party analytics providers that help us compile statistics about the effectiveness of promotional campaigns and other operations, or from third party social networks, which enables us to provide social media features and functions for some of our Services. These technologies allow these third parties to set or read their own cookies or other identifiers on your device, through which they can collect information about your online activities across applications, websites, or other products. For example, PRA uses Google Analytics to collect information about the

number of visitors to the Services, where they come from, and how they use the Services. We use this information to help us to improve the Services.

Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Services do not currently respond to browser DNT signals.

How to Exercise Your Privacy Rights

The law may give you certain rights relating to your personal information and our processing of it. Although these rights differ depending upon geography and other circumstances, PRA will honor your rights in compliance with the laws that apply. You may exercise these rights by visiting our privacy rights portal [here](#) and providing the information requested. (NOTE: California residents should click [here](#) instead, and read to the “Additional Information for California Residents” section below.) Our privacy team will review your request and respond to you within a reasonable time frame.

Although the specific names given to privacy rights vary from place to place, common types of rights you may have include:

- The right to have access to information that we have about you;
- The right to correct inaccuracies in information that we have about you;
- The right to withdraw a consent you may have previously given to process information that we have about you;
- The right to have certain information we have about you deleted from our records;
- The right to place certain restrictions on the way we process personal information about you; and
- The right to object to some kinds of processing of your personal information.

It is important to understand that these rights are not absolute, and that in some cases we will be partially or even completely unable to comply with your request, though in all cases we will comply with the laws that apply. In particular, maintaining the integrity and validity of the clinical trial data is crucial to the success of scientific research, which must be taken into account as we respond to requests.

PRA reserves the right not to respond to requests generated through third-party applications or automated processes without direct validation of the requests by data subjects using the resources provided by PRA for the exercise of these rights.

Please be advised that if you are a patient in a clinical trial, PRA has no means by which to identify you and therefore cannot respond to privacy rights request. You should contact the Doctor who is treating you at the clinical trial site for any requests.

Your Communication Preferences

You can opt-out of receiving promotional or marketing communications from us at any time by using the unsubscribe link in the email communications we send. If you or your organization are a PRA client or business partner, we will still send you non-promotional communications, like study-related emails.

Where an application that we provide enables you to directly manage your preferences and the personal information you are providing, we will make this readily available to you for you to exercise choice. You can also contact us at any time. The supplemental information notice provided to you for specific Services may provide contact points or instructions on preference election for that Service.

Additional Information for Individuals in the United Kingdom, European Economic Area and Switzerland

Legal Bases for Processing of Personal Information

We rely on different legal grounds for the processing of your personal information that depend on the context of your interactions with PRA:

- We process personal information we collect through the Services for certain legitimate business interests. These legitimate interests relate to conducting and managing our business. When we process personal information for these purposes, we will ensure that we take account of your privacy rights. You can object to this processing using the link in "How to Exercise Your Privacy Rights" (above). Our legitimate business purposes include:

- Where processing enables us to enhance, modify, personalize or otherwise improve our Services and communications for the benefit of our users;
 - Determining the effectiveness of promotional campaigns and advertising and ensuring communications are relevant to the choices you make; and
 - to enhance the security of our Services and information systems to maintain the integrity and protection of information they contain.
- If we process your personal information under a consent provided by you, you have the right to withdraw that consent at any time as set out in the section above “How to Exercise Your Rights.” Your withdrawal of consent, however, will not affect the lawfulness of any processing we have undertaken before the withdrawal.
 - We may process your personal information where necessary for our compliance with a legal obligation.

Finally, in some cases we process your Personal Information as necessary to perform a contract with you, or to take steps that you request before we enter into that contract.

Right to Complain to a Supervisory Authority

Under the GDPR and the UK Data Protection Act, you have a right to lodge a complaint directly with the country Supervisory Authority responsible for where you live, work or where an alleged infringement has occurred. You may also contact PRA’s Data Protection Officer at PrivacyOfficer@prahs.com if you have any questions or concerns.

Additional Information for Residents of the State of California

This section supplements the remainder of this Privacy Notice and applies solely to residents of the State of California, to the extent the California Consumer Privacy Act of 2018 (“CCPA”) applies to PRA’s processing of their personal information (these individuals are referred to in this section as “California Consumers”). As it relates to California Consumers:

The term “personal information,” when used in this Privacy Notice, should be interpreted to have the same meaning as specified in the CCPA. Personal information does not include de-identified or aggregated information, or any other information the CCPA excludes from its scope.

Depending upon the nature of your interaction with PRA, information described in “Why we collect your personal Information” may include data subject to Cal. Civ. Code § 1798.80, and

information about protected classifications under California or federal law, such as race, age, sex, gender, gender identity, sexual orientation, medical condition, disability, citizenship status, and military and veteran status.

“Sale” of data under the CCPA

PRA does not rent or sell your personal information to anyone for monetary compensation. However, as disclosed above, including the “Cookies and Similar Technologies” and “Web Beacons and Analytics” section, PRA does allow certain third parties like Google Analytics to set their own cookies or identifiers that enable them to gather personal information about you. When you first visit our website, you are presented with a choice about whether or not you wish to permit the use of those cookies. If you would prefer not to permit these third-party cookies, you can decline to accept them. If you accept these cookies and later decide you no longer wish to permit them, you can either use the settings in your browser to clear all cookies, or you can click [Cookie Preferences](#) to change your preferences for our site.

CCPA Rights of California Consumers

In addition to the right to opt out of the sale of information described above, the CCPA provides California Consumers with other rights relating to their personal information. PRA will honor verified requests to exercise those rights, and will not unlawfully deny you services, charge you different prices, or provide you a different quality of service for exercising those rights. These rights include:

Accessing Information PRA has collected about you

Upon request, PRA will provide California Consumers with information about our collection and use of your personal information over the last 12 months, including categories and specific pieces of personal information PRA has collected about you, our business purpose(s) for collecting them, and the categories of third parties with whom we share them.

Requesting that PRA delete your information

You may request that PRA delete any personal information it has collected about you. This right is not absolute, however, and under some circumstances PRA may decline to delete your personal information where permitted by the CCPA.

Exercising your CCPA rights

California Consumers can exercise their rights under the CCPA by visiting [HERE](#), or by calling +1 877.202.0559. Regardless of how you make your request, please provide sufficient detail for PRA to properly assess and respond to it. PRA may be unable to respond to incomplete or vague requests.

PRA will require you to verify your identity before proceeding with your request, and will typically require you to provide at least two or three pieces of information that may be used for verification. Information needed to verify identity may vary depending upon your relationship with PRA. If other measures or more information is required, such as the provision of one or more forms of valid government identification, we will contact you and request additional verification.

You may authorize an agent to make a request on your behalf. Any agent making a request on your behalf must indicate that they are acting as your agent or representative and provide the name, email address and description of the agent's relationship with the individual, and a certification that the agent has permission to submit the request on the individual's behalf. PRA may require proof of the agent's authorization, including the written permission of the individual the agent represents, and/or a valid Power of Attorney.

PRA reserves the right not to respond to requests generated through third-party applications or automated processes without direct validation of the requests by data subjects using the resources provided by PRA for the exercise of these rights.

Other Important Information

PRA's International Transfer, Processing, and Storage of Personal Information

PRA is a United States-headquartered global organization. The personal information we collect through the Services will be transferred, processed, and stored on servers in the United States.

Our privacy practices are designed to protect your personal information all over the world. When personal information collected by our affiliates in the European Economic Area ("EEA") is transferred outside the EEA, we use appropriate safeguards such as standard contractual clauses to ensure adequate protection for that information.

Retention and Deletion of Personal Information

PRA will retain your personal information: for as long as needed for the purposes described in this Privacy Notice and more specifically any supplemental notices relating to individual Services; as necessary to comply with our legal obligations (such as to honor the exercise of rights), resolve disputes, and enforce our agreements; or to the extent otherwise permitted by applicable law.

At the end of the retention period, PRA will delete your personal information in a manner designed to ensure that it cannot be reconstructed or read.

Links to Third-Party Websites and Services

The Services may provide links to or the ability to connect with non-PRA websites, services or applications. Clicking on those links or otherwise enabling connections with those services may allow the third party to collect or share information about you. Those third-party websites or services are beyond our control and are not subject to this Privacy Notice. We encourage you to check the privacy policies and terms of use of any non-PRA websites or services before providing your Personal Information to them.

Children

The Services within the scope of this Privacy Notice are not designed or directed toward anyone under the age of 16. We do not knowingly collect or solicit personal information from anyone under the age of 16. If you are under 16, please do not use the Services or send any personal information about yourself to us.

Changes to This Privacy Notice

We update this Privacy Notice from time to time. When we post changes we will revise the "Last Updated" date at the end of this Privacy Notice.

If there are substantial changes to this Privacy Notice or to the ways we will use your personal information, we will notify you either by prominently posting a notice of the changes in the Services before they take effect or by directly sending you a notification. We encourage you to review this Privacy Notice periodically to be informed of how we are using your information and to be aware of any changes to the Privacy Notice.

Questions About Our Privacy Practices

If you have any questions or concerns about our privacy practices or this Privacy Notice, please send us a detailed message by email to PrivacyOfficer@prahs.com; or by writing to us at the following address:

Privacy Officer
Pharmaceutical Research Associates Inc.
4130 Parklake Avenue, Suite 400
Raleigh, NC 27612 USA

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