

PATIENT PRIVACY POLICY SUMMARY

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;
- submit a completed website form via the St Pancras Clinical Research website; or,
- contact us directly by telephone; or,
- contact us directly by email to a @stpancrasclinical.com address; or,
- contact us directly by letter/ mail; or,
- visit our London clinic.

We 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, dignity and well-being of trial subjects (patients) are the most important consideration and should prevail over the interest of science and society".

International Conference on Harmonisation of technical requirements for registration of pharmaceuticals for human use (ICH) Guidelines for Good Clinical Practice.

SPCR will hold your data in accordance with the UK General Data Protection Regulation (UK GDPR), which is supplemented by the UK Data Protection Act 2018. The UK GDPR is based on the EU General Data Protection Regulation (Regulation (EU) 2016/679). SPCR is registered as data controller with the Information Commissioner's Office for Data Protection (Registered Data Controller Number: ZA202021). See - https://ico.org.uk/.

This policy sets out your rights to:

- Understand what data is held, such as your name, email address, your phone number, as well as any other information you provide via the contact methods above;
- Understand why and how we process your data;
- Understand how we seek, record and manage consent, including your opt-in to consent;
- Access your data;
- Rectify the data to ensure the quality of data that we hold;
- Control retention and 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.

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For data held by SPCR as the data controller (prior to consent for a specific study), 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.

To protect your privacy, we uphold the following principles:

- We do not collect more information than is necessary;
- We do not use your data for purposes other than as is necessary for your interactions with SPCR as part of your current, potential or previous participation in a clinical study;
- We make sure that your data is stored securely;
- We do not keep your data if it is no longer needed;
- Once it is no longer needed, we will dispose of your data in a safe and secure manner, in accordance with SPCR's retention policy,
- We only provide your data to select third party clients solely for the purpose of carrying-out a
 trial, and this would be on a need-to-know basis. We do not use profiling, we do not sell or in any
 other way disseminate your data to third parties, other than what we have specified for study
 purposes.
- We constantly review our Privacy Policy to improve it and enhance the protection of your data.

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

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

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

CONTACT DETAILS

If you, or someone you authorise to act on your behalf, have any questions about our collection, use, storage, and retention of data, please contact us at:

St Pancras Clinical Research, 3 White Lyon Court, Barbican, London EC2Y 8EA

Tel: +44 (0) 203 865 1142

patientcare@stpancrasclinical.com

If you would like a copy of the full policy, please contact:

Data Protection Officer: dorothyharris@stpancrasclinical.com.

Our Privacy Policy was first effective from 25 March 2018.

We reserve the right to change this Privacy Policy and any changes will be notified on our website.

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