

TRIAL PARTICIPANT PRIVACY POLICY SUMMARY

St Pancras Clinical Research Limited (SPCR) provides clinical trial and participant 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 form via the St Pancras Clinical Research website;**
- **contact us directly by telephone;**
- **contact us directly by email to a @stpancrasclinical.com address;**
- **contact us directly by letter mail; or,**
- **visit our London clinic, which is monitored by CCTV.**

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 (participants) 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. 1996 (R2) 2016.

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/>.

SPCR uses guidance provided by the UK Government National Cyber Security Centre (NCSC) which means that our IT systems are protected and secure against the most common cyber-attacks. <https://www.ncsc.gov.uk/>.

THIS POLICY SETS OUT YOUR RIGHTS TO UNDERSTAND:

- What data we hold, such as your name, email address, your phone number, as well as any other information you provide via the contact methods above;
- Why and how we process your data; and,
- How we seek, record, and manage your consent for us to control your data, including your opt-in for consent.

AND, AFTER GDPR CONSENT WHEN YOU HAVE SUPPLIED DATA TO SPCR, YOUR RIGHTS TO:

- 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;
- Enable your data to be transferred to another controller - data portability; and,
- Object to SPCR holding your data and withdrawal of your consent for us to hold your data.

For data held by SPCR as the data controller (prior to informed 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.

Please note that if you consent to be enrolled on a specific study, any of your personal data gathered after that consent belongs to the company developing the new medicine and information about your data protection rights are included in the study consent Patient information Sheet (PIS).

TO PROTECT YOUR PRIVACY, SPCR UPHOLDS THE FOLLOWING DATA PROTECTION PRINCIPLES:

- By completing our on-line questionnaire about a trial, you give consent for us to store your data on our database.
- We do not collect more information than is necessary.
- We do not use your data for purposes other than 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 keep data indefinitely until we no longer need it for legitimate business purposes or until a participant opts out.

- 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, and we do not sell your data to third parties.
- We constantly review our Privacy Policy to improve it and enhance the protection of your data.

Our website aggregates information on how your data 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.

If you visit the clinic, please note that we operate a CCTV system to protect our premises, staff and all our visitors. Notices will inform you when entering an area covered by CCTV where your image may be recorded. We manage all information collected by CCTV under UK data protection law and relevant codes of practice.

Strict confidentiality is assured at all stages of your contact with us. Importantly, to maintain that confidentiality, participants must not connect with our staff or other member of the study team on any personal social media account, as this may jeopardise your place on a trial if your anonymity is broken.

CONTACT DETAILS

If you, or someone you authorise to act on your behalf, have any questions about our collection, use, storage, retention, and deletion 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 before the EU GDPR came into force.

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