

## COLPITTS CLINICAL PRIVACY NOTICE

Privacy Notice last updated on March 4, 2021

Direct Travel, Inc. and wholly owned subsidiary, Unisphere Travel Ltd., Inc., d/b/a Colpitts Clinical are committed to protecting your privacy. This Privacy Notice (“**Notice**”), (collectively, “Colpitts Clinical,” “**us**”, “**we**”, “**our**”) explains our privacy practices and provides information on how and why we collect, use and share your personal information through our interaction with you and through our products and services and when you visit our website and, clinical travel portal (“**Website**”), our mobile applications (“**Apps**”) or use our communications platforms (“**Services**”). The policy also describes your choices regarding use, access, deletion and correction of your personal information.

Colpitts Clinical’s Privacy Notice applies to Sponsors, Clinical Research Organizations and Clinical Trial Sites (“Clients”) and Patients and Caregivers “Users” (all other individuals who use the Colpitts Clinical products, services, apps or website) provide directly to us when they use our Website, Apps, or Services. You may choose not to provide certain information to us but doing so may restrict your ability to use our Services. If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided at the bottom of this Notice.

## INFORMATION WE COLLECT

The personal information that we may collect about you and your Caregiver (if applicable to study) broadly falls into the following categories:

*Information which Clinical Trial Sites and you provide to us*

Clinical Trial Sites, our Website and Services may ask you to provide certain personal information.

We collect information which you provide directly to us when you use our Website, Apps or Services. The types of personal information we may collect

directly from you include full name, patient id, email addresses, postal addresses, phone numbers, government ID (if needed for travel services), gender, date of birth, information about the type of service required, bank account information (if needed for expense services,) transactional information, as well as any communications, inquiries, contact or other information you choose to provide during your use of the Services.

When you provide this personal information, we will only use this information for the specific reason for which it is provided. If you would like to request that it be removed from our database, please contact us at [privacy@dt.com](mailto:privacy@dt.com)

*Information we only collect automatically if Patient accesses our Website or Apps or use our Services*

We may collect certain information about your use of the Site through the use of tracking technologies or by other passive means. This “passively collected” information includes, but is not limited to, the domain name of the website that allowed you to navigate to the Site, search engines used, the internet protocol (IP) address used, the length of time spent on the Site, the pages you looked at on the Site, other websites you visited before and after visiting the Site, the type of internet browser you have, the frequency of your visits to the Site, and other relevant statistics, including the following:

**Log Information.** When you access the Site, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, IP address, browser type, browser language, the date and time of your request, and one or more cookies (small text files containing a string of characters) that may uniquely identify your browser.

**Links.** The Site may include links in a format that enables us to keep track of whether these links have been followed by IP addresses. We use this information to improve the quality of our products and design.

**Cookies.** When you visit or access the Site, we send one or more cookies (small text files containing a string of characters) to your computer that uniquely identifies your browser. We use cookies to improve the quality of the Site by storing user preferences and tracking user trends. Most web browsers accept cookies automatically, but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. Please note that if you disable cookies, you may not be able to use some customized features available through the Site.

**Web Beacons.** Web beacons (also known as “pixel tags” or “clear GIFs”) are 1×1 single-pixel graphics that allow us to count the number of users who have visited or accessed the Site and to recognize users by accessing our cookies. We may employ web beacons to facilitate Site administration and navigation, to track the actions of users of the Site, to compile aggregate statistics about Site usage and response rates, and to provide an enhanced online experience for visitors to the Site. We may also include web beacons in HTML-formatted e-mail messages that we send to determine which e-mail messages were opened.

**Do Not Track.** We do not respond to web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information about an individual consumer’s online activities over time and across third-party web sites or online services.

**Third Party Tracking.** We do not allow third parties to collect personal information about your online activities over time and across different websites when you use the Site.

When you visit our Website, or use our Apps or Services, we may collect certain information automatically from your device. In some countries,

including in the European Economic Area, this information may be considered personal data under applicable data protection laws:

Usage information – We keep track of your activity in relation to the Website, Apps or Services, the configuration of their computers, and performance metrics related to their use of the Website, Apps or Services. For example, when you use our Services, we may collect:

- 1. Traffic data about the communications that take place through our platform (such as calls, team chat, video conferencing, SMS,) to enable us to transmit those communications effectively and efficiently;
- 2. Network Monitoring data to enable us to maintain the security and agility of our internal networks;
- 3. Log data about you when they use the Services, Website or Apps including Internet Protocol (“IP”) address, Internet Service Provider (“ISP”), browser type, referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site;
- 4. Device data about any device including mobile phone number and other information related to mobile devices like operating system and model if you use our Services via our Apps. For other devices information collected by cookies and other similar technologies. We use various technologies to collect information which may include saving cookies to your computers;
- 5. Call Detail Records of data record produced by a telephone call or other telecommunications transactions. The record contains various attributes of the call, such as time, duration, completion status, source number and destination number;
- 6. Meta data, which is data created about other data which can include size, formatting, other characteristics of a data item;
- 7. Emails/Communications with us; and
- 8. Billing data, which may include payment reimbursement data.

Cookies and other similar technologies – We use various technologies to collect information which may include cookies when you visit our Website or use our Apps or Services. Please see the [Cookies Notice](#) for further information.

#### *Information we collect from third parties*

We learn information about you when businesses interact with us and use our services, including when someone else provides us information about you (e.g., when a study sponsor, clinical research organization, or a clinical trial site or a third party (such as travel agency, global distribution system, travel

supplier, etc.) provides us your information in order for us to perform Services for them.

We may collect the names and e-mail addresses of individuals from third parties to market our products/services to these individuals. This collection of information and marketing is always carried out in compliance with applicable law. We only receive this information where we have checked that these third parties either have your consent or these third parties are otherwise legally permitted or required to disclose your personal information to us.

We may receive personal information about you from other sources, including publicly available databases or third parties combine this data with information we already have about you, in accordance with applicable laws. This helps us to update, expand and analyze our records.

We may collect personal information about you from other applications you may use if you choose to integrate Colpitts Clinical Apps or Services with other Apps or Services.

## INFORMATION WE USE

We may use the information we collect from you for a range of purposes, including to:

- Administer, operate, protect and maintain the Website, Apps or Services;
- Process and complete transactions, and send related information to travel providers and clinical trial sites, including transaction confirmations and invoices;
- Manage and improve your use of the Website, Apps or Services;
- Investigate and prevent fraudulent activities, unauthorized access to the Website, Apps or Services, and other illegal activities; and
- For any other purposes about which we notify and receive your consent from you;
- To help personalize your experience;
- Respond to inquiries and requests and to provide you with information and access to resources that you have requested;
- Aggregate and analyze your and use of the Website, Apps or Services for trend monitoring; and

Send you technical alerts, updates, security notifications, and administrative communications..

*Legal basis for processing personal information (EEA only)*

Definitions of certain terms (including but not limited to Data Subject, Personal Data, Processing, Legal Basis, Data Processor, Data Controller) within this notice are defined under Article 4 of the European General Data Protection Regulation 2016/679 (GDPR) found here: **GDPR Definitions**.

If you are from the European Economic Area (EEA), our legal basis for collecting and using your personal data described above will depend on the personal data concerned and the specific context in which we collect it. This notice provides mandatory information as required under Articles 13 and 14 of the GDPR regarding the transparency of data processing of your personal data as the Data Subject.

Colpitts Clinical will act as a Data Processor where the study sponsor, or clinical research organization or clinical trial site is our Client acting as Data Controller. Under written contract, the Data Controller authorizes clinical trial sites to pass personal data of their patients and caregivers (if applicable) to Colpitts Clinical to manage and process patient and caregiver travel and expense arrangements in connection with a clinical trial. It is this contract which forms the 'Legal Basis' for the processing of personal data carried out by Colpitts Clinical in these circumstances.

Colpitts Clinical will become a Data Controller if it collects additional personal data directly from you only where we have your consent to do so, and where we need the personal data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal data in question.

If we ask you to provide personal data to comply with a legal requirement or enter into a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data).

Similarly, if we collect and use your personal data in reliance on our or a third party's legitimate interests and those interests are not already listed above (see "Information We Use" section), we will make clear to you at the relevant time what those legitimate interests are.

Colpitts Clinical acts as a Data Controller for any personal data held regarding its own employees, and legally processes this data under its Contract of Employment with those Data Subjects.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact details provided under the "Contact Us" section below.

## SHARING AND DISCLOSURE OF INFORMATION TO THIRD PARTIES

To fulfill the travel and expense arrangements on your behalf, it will in most cases be necessary to process personal information via a third party (these will include but are not limited to airlines, hotels, car hire companies, car rental, financial institutions and Visa or Passport companies). Personal information shall only be transferred to, or processed by, third party companies where such companies are necessary for the fulfillment of the travel and expense arrangements.

We may share and disclose your information that we collect with the following third parties for the purposes of providing you travel and expense management services:

- Direct Travel or any of its affiliates consistent with this Notice for data processing;
- Business partners, contractors, vendors, and authorized third party agents, to:
  - Law enforcement agencies, regulatory or governmental bodies, or other third parties in order to respond to legal process, comply with any legal obligation; protect or defend our rights, interests or property or that of third parties; prevent or investigate wrongdoing in connection with the Website, Apps or our Services;

*For EEA persons only:*

Personal Data shall not be transferred to a country or territory outside the EEA unless the transfer is made to a country or territory recognized by the EEA as having an adequate level of data security, or is made with the consent of the Data Subject, or is made to satisfy the Legitimate Interest of Colpitts Clinical in regard to its contractual arrangements with its Clients.

All internal group transfers of Personal Data shall be subject to written agreements under the Company's Intra Group Data Transfer Agreement (IGDTA) for internal data transfers which are based on Standard Contractual Clauses recognized by the European Data Protection Authority.

## **YOUR PRIVACY RIGHTS**

### *Update and access to your information*

Where we process personal information collected via our Website or Apps or via our Services for our own account management, we provide individuals with the opportunity to access, review, modify, and delete any such personal information that we process as required by the applicable law of your residence.

### *Unsubscribe from our mailing list*

You may at any time ask us to remove you from our mailing list by clicking "Unsubscribe" in any e-mail communications or push notification we send you, or by going to our [unsubscribe webpage](#) to submit a request. We will remove you from our mailing list in accordance with applicable laws.

### ***Your Privacy Rights as an EEA Person***

In addition, if you are from the EEA, you may have broader rights to access and delete your personal data, to object to or restrict processing of your personal data, or request portability of your personal information.

To make such requests, you can send an email to [GDPRinquiries@dt.com](mailto:GDPRinquiries@dt.com) or write to us at the mailing address in the "Contact Us" section below. We will consider and handle all requests in accordance with applicable laws.



If we have collected and processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

You also have the right to complain to your local data protection authority at any time. In general, when processing personal data to provide our Services, we do so only on behalf of our EEA Clients and in accordance with their instructions. This means that if you wish to access, review, modify or delete any personal data we process on behalf of a Colpitts Clinical Client, under applicable EEA law or otherwise, you should contact that Client with your request. We will then help them to fulfill that request in accordance with their instructions.

### ***Your Privacy Rights as a California Resident***

Beginning January 1, 2020, if you are a California resident, you may have certain rights under the California Consumer Privacy Act of 2018 (CCPA). You need not be physically present in the state of California to exercise these rights, provided that you have a current California residence.

#### *Rights to Access and Data Portability:*

You have the right to request that we disclose certain information to you about the collection and use of your personal information over the preceding twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

(1) information identifying each third-party company to whom we may have disclosed, within the past year, personal information pertaining to you for our direct marketing purposes;

(2) a description of the categories of personal information disclosed with third parties;

(3) our business or commercial purposes for collecting or selling that personal information;

(4) the specific pieces of personal information we collected about you (also known as a data portability request);

(5) if we sold or disclosed your personal information for a business or commercial purpose, two separate lists disclosing (a) sales, identifying the categories that each category of recipient purchased; (b) disclosures for a business purpose, identifying the categories that each category of recipient obtained.

*Right to Request Deletion:*

You have the right to request that we delete any of the personal information we collected from you and retained, subject to certain exceptions.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete transaction for which we collected the personal information, provide the service you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise reasonably perform our contract with you or on behalf of you for our Clients;
2. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
3. Comply with a legal or regulatory obligation;
4. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such acts;
5. Debug products and software to identify and repair errors that impair existing intended functionality;
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on our dealings and your relationship with us;
7. Make other internal and lawful uses of that information which are compatible with the context that you provided said information.

If you are a California resident who qualifies to receive such an accounting or would like to exercise a deletion or data portability request, please email [CCPAinquiries@dt.com](mailto:CCPAinquiries@dt.com), or contact us at (888) 546-1504, and we will

contact you within 10 days of such request and will be required verify your identity.

**Please note that, in order to better safeguard your privacy and the privacy of others, we may (to the extent permitted — and/or required — by applicable law/regulation) ask you to provide additional information to verify your identity and/or residency before processing any data-related requests.** We strive to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require additional time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests and for CCPA compliance, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

There is no charge for making privacy-related requests or responding to your verifiable consumer requests unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of our decision and why, and provide you with a cost estimate for you to consent to before completing your request.

#### *Do Not Sell My Personal Information*

Click the above to submit a request as a California resident under CCPA.

## **THIRD-PARTY SITES**

This Notice does not apply to, nor are we responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Website links including but not limited to social media sites. The inclusion of a link on the Website does not imply our endorsement of the linked site or service. You should check the

privacy notices of those sites before providing your personal information to them.

## SECURITY

Keeping your information secure is important to us. We maintain a variety of appropriate technical and organizational safeguards to protect your personal information both during transmission and once it is received. Colpitts Clinical has no control over or responsibility for the security or privacy policies or practices of other sites on the Internet you might visit, interact with, or from which you might buy products or Services, even if you visit them using links from our Website.

Please note that no website, mobile app or service is completely secure and so, while we endeavor to protect our Clients' information using the measures described above, we cannot guarantee that unauthorized access, hacking, data loss or a data breach will not occur.

## DATA PROTECTION PRINCIPLES

*For EEA Data Subjects, Colpitts Clinical has adopted the following principles to govern its collection and processing of Personal Data:*

- Personal Data shall be processed lawfully, fairly, and in a transparent manner.
- The Personal Data collected will only be those specifically required to fulfill travel, accommodation, other travel-related requirements and any expense services. Such data may be collected directly from the Data Subject or provided to Colpitts Clinical via his /her trial sponsor, clinical research organization for clinical trial site. Such data will only be processed for that purpose.
- Personal Data shall only be retained for as long as it is required to fulfill contractual requirements.
- Personal Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal Data shall be accurate and, where necessary, kept up to date.
- The Data Subject has the right to request from Colpitts Clinical access to and rectification or erasure of their personal data, to object to or request restriction of processing concerning the data, or to the right to data portability. In each case such a request must be put in writing and sent to [GDPRInquiries@dt.com](mailto:GDPRInquiries@dt.com).
- Personal Data shall only be processed based on the legal basis as explained above, except where such interests are overridden by the fundamental rights and freedoms of the Data Subject which will always take precedent. If the Data Subject

has provided specific additional Consent to the processing, then such consent may be withdrawn at any time (but may then result in an inability to fulfil travel requirements).

- Colpitts Clinical will not use personal data for any monitoring or profiling activity or process, and will not adopt any automated decision making processes.
- The Data Subject has the right to make a complaint directly to a supervisory authority within their own country. Colpitts Clinical's Data Protection compliance is supervised by:

Darryl Hoover, CTO

Direct Travel

7430 East Caley Avenue

Centennial CO 80111

## DATA RETENTION

We will retain your personal information for no longer than is necessary to fulfill the purposes for which the information was originally collected unless a longer retention period is required or permitted by law, for legal, tax or regulatory reasons, or other legitimate and lawful business purposes.

Where we have no ongoing legitimate business need to process your personal information, we will either delete, aggregate or otherwise anonymize it.

## INTERNATIONAL DATA TRANSFERS

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. Specifically, information collected outside the United States, including in the EEA, may be transferred to and stored on our servers in the United States, United Kingdom and France and potentially in other countries where our group of companies and third-party service providers and partners operate. These countries may have data protection laws that are different to the laws in your country (and in some cases, may not be as protective).

However, we have taken appropriate safeguards to ensure that your personal information will remain protected in accordance with this Notice and applicable

laws. For example, in respect of personal information originating from the EU and Switzerland, Colpitts Clinical has self-certified to the EU -U.S. and Swiss-U.S. Privacy Shield Frameworks, which can be verified [here](#). Please [click here](#) to view our Privacy Shield Notice.

Under certain conditions, more fully described on the Privacy Shield [website](#), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## CHILDREN'S PRIVACY

Children are not eligible to use our Websites, Portal, Apps or Services, and we ask that minors (children under the age of 18) not submit any personal information to us. Only parents or guardians can provide consent to submit a minors personal information to Colpitts Clinical. If you are a minor, you can use the Site only in conjunction with your parents or guardians

## UPDATES TO THIS NOTICE

We may update this Notice from time to time in response to changing legal, technical, or business developments. If we change our Notice, we will post those changes on this page in addition to updating the "Last Updated" date at the top of this webpage. If we make changes, we will notify you more directly, for example by posting a notification or message on the Website or by emailing you prior to such changes taking effect. We encourage you to review this Notice regularly to stay informed of the latest modifications.

## CONTACT US

If you have any questions, comments or concerns about this Notice, please e-mail us at [privacy@dt.com](mailto:privacy@dt.com). Or, you can write to us at:

Direct Travel

Attn: Legal Team

7430 E. Caley Avenue, Suite 320

Centennial, CO 80111

[View our Privacy Shield Policy](#)