

INTERNET DATA PRIVACY POLICY

“Carpathian Research Group” LLC

(www.crgroupe.com)

Please note: our web-site uses cookies, refer to “Cookie Policy” (integral part of this document) below in the text!

BY USING OUR WEB-SITE YOU AGREE WITH OUR PRIVACY POLICY DESCRIBED IN FULL IN THIS DOCUMENT AND GIVE CONSENT FOR US TO USE YOUR PERSONAL DATA IN COMPLIANCE WITH THIS POLICY AND CURRENT INTERNATIONAL AND LOCAL REGULATIONS ON DATA PRIVACY AND PROTECTION

IF YOU DISAGREE WITH THIS POLICY AND DO NOT WISH TO SHARE YOUR PERSONAL DATA WITH US PLEASE IMMEDIATELY LEAVE THIS WEB-SITE

Effective the 25th of May 2018, the General Data Protection Regulation (EU) 2016/679 apply. It states that your specific, clear, freely given and unambiguous consent is needed to store your Personal Data on our systems.

When submitting your personal information through our web-site at www.crgroupe.com and giving your Consent the **Carpathian Research Group LLC** (hereafter could be referred as CRG LLC) will store and process your Personal Data under all current data privacy regulations, including the General Data Protection Regulation (EU) 2016/679. We will continue to do so until this Consent is withdrawn, or for as long we are required to save it for a clear legal, contractual or administrative reason.

Therefore, we are very committed to keeping your data updated.

Under the General Data Protection Regulation (EU) 2016/679 **Carpathian Research Group LLC** considers itself as both **DATA CONTROLLER** and **DATA PROCESSOR**.

Legal company details are:

Limited Liability Company “Carpathian Research Group”

Vul. Samostiyna, 42-A, 77400, Ivano-Frankivsk Region, City of Uhryniv, Ukraine

Tel.: +38 067 353 23 23; Fax: +38 067 231 86 96

Please know that you are always free to exercise your privacy rights to access, review, modify, and delete your Personal Data that we have saved, or to object to or restrict processing of your Personal Data, or request portability of your Personal Data.

We will gladly assist you in exercising your privacy rights. You can contact us at info@crgroupe.com.

We have concluded that your Personal Data is safe with us and has always been handled in line with the intent of the new General Data Protection Regulation.

Up to now, we have stored your Data on encrypted servers or behind lock and key in offices with no public access.

We have always respected your right to access, review, modify, and delete your Personal Data that we process in accordance with European Laws.

We have been available to exercise your right to object to or restrict processing of your Personal Data, or request portability of your Personal Data.

We have always, and will always, reach out to you to verify accuracy of the Personal Data we have stored.

We have without fail obtained your Personal Consent before sharing your Personal Data, or a part thereof, with our any other third-party.

The purpose of the GDPR is to provide a set of standardised data protection laws across all the Member States of the EEA. This should make it easier for EU citizens to understand how their data is being used.

Carpathian Research Group LLC Service Providers are committed to protecting your Personal Data, as we recognize your privacy rights as a data subject, and your right to confidentiality as a data controller or processor.

We aim to be transparent by providing information to individuals and organizations about how we will collect and use their Personal Data in our organisation.

We assure you that any cases of a breach of your Personal Data will be reported to you **within 72 hours** of **CRG LLC** becoming aware of a breach, and we commit to informing an applicable independent Supervisory Data Authority concerned, if and when mutually agreed with you, or legally obliged by applicable law(s).

We appreciate the trust that you place in us by sharing your Personal Data with **CRG LLC**.

We aim to be transparent by providing information to individuals about how we will collect and use their Personal Data in our organisation.

We aim to always process your Personal Data in accordance with our mutual agreement, and with due diligence, maintaining the highest level of confidentiality.

We aim to always provide clear and fair information on how your Personal Data is used, and we will be transparent about what information we collect and how it is or will be processed.

Within available organizational and technological means, we will take measures to protect your Personal Data from being used without your consent and will keep it secure from the moment it arrives, as part of our business processes.

We aim to comply with all applicable data protection laws and regulations. In case of any data loss we will inform relevant supervisory authorities in the applicable country.

Please note that **CRG LLC** does not actively use, collect, determine or disclose Sensitive Personal Data without your consent, other than as required by law.

We prefer you do not share Sensitive Personal Data with **CRG LLC**, unless it could legally or physically impact your ability to perform the services we, or our clients, request from you, or that you offer.

Sharing of sensitive data is needed to provide services for a specific project.

Cookie policy

Cookie is a small file that can be placed on your device that allows us to recognize and remember you. It is sent to your browser and stored on your computer's hard drive or mobile device/tablet. When you visit our web site, we may collect information from you automatically through cookies.

We use the following types of cookies:

- Performance – cookies which measure how often you visit our site and how you use it. We use this information to understand how we can improve your experience with the use of content of our web site. For example, we collect information about which of our pages are most frequently visited and by which type of users. We also use third-party cookies to help with performance. For example, Google Analytics cookie gives us information such as your browsing between pages and whether you have downloaded anything.
- Functionality – cookies that are used to recognise you, remember your preferences or settings when you return to our site, to collect information about the content you viewed, the links followed, information about your browser, device and IP address.

OUR SITE HAS NO FUNCTIONALITY TO DISABLE COOKIES. By selecting "I ACCEPT" to the pop-up cookie message at our web-site you agree to the terms and conditions of CRG Internet Privacy Policy.

IF YOU DISAGREE TO THE USE OF COOKIES PLEASE IMMEDIATELY LEAVE THIS WEB-SITE.

Who are we and what is our legitimate interest?

Carpathian Research Group LLC is a commercial company of independent clinical research professionals.

CRG LLC aims to match staffing request of, amongst others, Research Institutes, Pharmaceutical Sponsors and Contract Research Organizations with potential Service Providers in its network, based

on Personal Data stored in its databases, and progress to develop a consultancy or clinical trials agreement with both client and Service Provider for a specific project. CRG is available to assist both Client and Service Provider throughout the project, but the project management and the project communication and information flow is usually direct between the client's project manager and CRG's Service Provider.

Legitimate business interest

As a clinical research organization our core business is knowing the capacity that specific consultancy resources have available in certain geographical areas, and under which local market conditions, and to match this to a Client's requirement. Therefore, the exchange and storage of Personal Data and the management and retention thereof, is at the heart of our business, and fundamental for our continued existence and the continuity of our Services.

In order maintain, expand and further develop our business, and to be able to support the needs of our Clients and our Service providers, we assess that it is our legitimate business interest to record and retain larger amounts of Personal Data of prospective and current Service providers, as well as Client contacts, current and past projects, requirements, and Confidential Business Data (as described in a separate policy, and governed by signed Confidentiality agreements, or contract); all for prolonged periods of time.

Data we collect

CRG LLC may with legitimate interest actively or passively collect, or be the Receiving Party of, Personal Data about you from different sources, including:

Data you give us directly

We may collect, or be the Receiving Party of, Personal Data from you directly. The types of Personal Data we may collect from you directly include, but may not be limited to: name, address, email address, user name, contact details, bank account number or other payment information, age, date of birth, gender, Curriculum Vitae, and any other Personal Data you voluntarily provide to us.

The types of information we may collect from you directly through your interaction with our site www.crgroupe.com include your:

First and Last Name;

Your company name and your position;

Email address;

Telephone number;

Data we collect from other sources

We may request, or be the Receiving Party of, Personal Data about you from other legitimate sources, including information from commercially available sources, such as public databases and data aggregators, and information from third parties.

Any Personal Data provided by you to **CRG LLC** through, but limited to, registration, administration, contract data, project data or CV submission, with and use of, our applications, such as web-site www.crgoupe.com, e-mail, other third-party technological service providers, will only be used for the following purposes by **CRG LLC**:

- updating and enhancing database records; and
- defining areas of interest to you and improving the services to meet clients' and providers' requirements; and
- delivering products and services, communicating with you about products and services; and
- advising you of other products and services which may be of interest; (v) providing, only with your clear, unambiguous and freely given consent, your contact details and other facilitating information (such as Blinded CVs and Open CVs, or company and project information) to interested parties; and
- prevent fraudulent activities and data entries; and respond to inquiries and requests; and
- to provide you with information and access to resources that you have requested or might interest you; and

register you to become part of the supporting services **CRG LLC** provides to its Clients and Service Providers, such as training, or ad-hoc consultancy.

Any other service we might develop in the future and will explain to you at that time.

We and our third-party marketing service providers may also use the Personal Data which data subjects send to us for our marketing purposes, if this is in accordance with applicable law and/or agreements we have in place. However, you may opt out of our marketing by contacting us.

Legal basis for processing Personal Data

If you are from the European Economic Area (EEA), our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

There are 6 lawful bases for processing Personal Data.

Data processing shall be lawful only if and to the extent that at least one of the following applies:

the data subject has given consent to the processing of his or her Personal Data for one or more specific purposes;

processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to

entering into a contract;

processing is necessary for compliance with a legal obligation to which the controller is subject;

processing is necessary to protect the vital interests of the data subject or of another natural person;

processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of Personal Data, in particular where the data subject is a child.

If you are from outside the EEA, please check with a local lawyer what the local lawful bases of processing local data are. It is important to remember that no matter what your location of business is, IF you process the data of a citizen living within the EEA, you are bound to abide by the GDPR rules and regulations.

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 "Data We Use" section), we will make clear to you at the relevant time what those legitimate interests are.

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 at info@crgroupe.com.

Consent

Consent to share Personal Data

CRG LLC will only collect, use or disclose your Personal Data in accordance with the intent of the GDPR legislation and with your clear consent (see definition below).

In every case your direct Personal Data is shared with third parties, we will ask for your specific consent explicitly.

In case we would like to use your indirect Personal Data for various or several occasions, such as for the use of a blinded CV, we will ask for a specific consent for a prolonged period of time.

Duration of your rights

If we have collected and processed your Personal Data with your consent, then you can withdraw your consent at any time, should you choose to do so. 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.

To make such requests, you can send an email to

info@crgroupe.com

We will consider and handle all requests in accordance with applicable laws.

You also have the right to complain to your local data protection supervisory authority at any time.

Unsubscribe from our mailing list

You may at any time ask us to remove you from our mailing list by sending us an email at info@crgroupe.com. We will remove you from our mailing list in accordance with applicable laws.

To request that your phone number be removed from future sales calls, please email info@crgroupe.com.