

## CORPORATE POLICY

TITLE:	ExecuPharm Privacy Policy
DEPARTMENT OR REGION:	Global
EFFECTIVE DATE:	09/SEP/2022

### 1 SCOPE

ExecuPharm, a Parexel International Company, is a global functional service clinical research organization headquartered in the US, providing clinical research support services to the pharmaceutical industry.

This policy sets out the requirements for the collection and management of personal data and applies to all personal data or information collected by, or on behalf of ExecuPharm.

### 2 POLICY STATEMENT

This Privacy Policy explains what ExecuPharm does with personally identifiable information that you provide to us, such as your name, mailing address, or email address. We want you to know how your personally identifiable information will be protected, who we may share it with, and for what purposes.

### 3 COLLECTION OF PERSONAL INFORMATION

Personal information collected by, or on behalf of ExecuPharm is often limited to name, mailing address, and email address but may include other information, as needed, in order to provide a requested service or when an employment opportunity is being considered, offered, or maintained. ExecuPharm takes reasonable steps to maintain collected personal information as accurate, complete, current, and utilized for its intended use.

ExecuPharm limits the collection and processing of personal information only to what is necessary to fulfill the intended purpose. When you contact ExecuPharm via its website to request or access information, you are asked to provide your personal information. By providing your personal information to ExecuPharm via its website, you agree to the terms of this Privacy Policy and to receive communications from ExecuPharm.

Personal information may also be used to administer and manage matters relating to ExecuPharm's Clients' contractual obligations and to comply with any potential applicable regulatory requirements.

ExecuPharm may process certain types of sensitive information (e.g., race or ethnicity for the purposes of US equal opportunities monitoring) if it is prescribed by local law, or it is needed for the protection of life, health, freedom, or if it is required

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for the performance of your employment contract, subject to appropriate security safeguards and local legal requirements.

ExecuPharm does not knowingly collect, sell, or share personally identifiable information from any person who is under the age of 16.

### 3.1 Retention and Use of Collected Information

ExecuPharm retains all the information we gather about you for 3 years or less (i.e., if you change or request the removal of your personal data as described below) in an effort to make repeat use of your information thereby maximizing efficient, practical, and relevant information related to business purposes.

### 3.2 Access to Collected Information

Provided personal information will be processed and stored in ExecuPharm internal databases that may be accessible from other areas and other countries. Access to personal information will be limited to authorized personnel, as required for business purposes, and to Information Technology (IT) for security and maintenance. Requests for access should be directed to [privacy@execupharm.com](mailto:privacy@execupharm.com).

When you provide personally identifiable information to ExecuPharm it may become accessible to some of ExecuPharm's business partners and affiliates. ExecuPharm retains companies to fulfill requests for information (e.g., background checks) and partners with Clients for business purposes related to contracted programs or projects. In those cases, they may also have access to your personally identifiable information. ExecuPharm will take reasonable steps to ensure that there is a confidentiality agreement or other contractual agreement in place with any third parties to whom it discloses personnel information for such business purposes.

There may also be instances where ExecuPharm may be required to share your information with third parties who have not been retained by us (directly or indirectly). For instance, if we are required to do so because of an applicable law, court order, or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad. Many entities receiving personally identifiable information under these conditions have privacy requirements that apply to their handling of your information.

ExecuPharm will not sell, rent, share, or lease personal information to any external company.

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### 4 TRANSFER OF PERSONAL INFORMATION

When ExecuPharm transfers personal information to countries other than the country where the information was provided, we do so in compliance with applicable privacy laws. We endeavor to protect personal information entrusted to us no matter what country it is stored in or transferred to and seek to have appropriate procedures in place to maintain the security of your personal information.

### 5 USE OF COOKIES AND OTHER WEB TRACKING TECHNOLOGIES

When you electronically access content provided by ExecuPharm, we may automatically collect and temporarily store certain information in server logs. This may include but is not limited to:

- Internet Protocol (IP) address in the normal course of the operation of our servers (IP addresses are assigned by your Internet Service Provider (ISP) and may be used to identify users)
- Device event information such as errors, browser type, browser language, the date and time of your request, referral URL, and visited URLs
- Cookies, that are stored locally, may uniquely identify your browser to ExecuPharm to allow automated access to certain services (this pertains to ExecuPharm personnel/users). You may be able to modify your browser preferences to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose not to accept cookies, you may not be able to use those functions of the websites that require registration.

### 6 SECURITY PROCEDURES TO PROTECT INFORMATION COLLECTED

ExecuPharm maintains a reasonable level of physical, electronic, and managerial procedures in order to protect the information that it collects from its website, candidates, and staff. This includes maintaining computer equipment, networks, programs, and documentation to a common standard and restricting access to equipment and information to appropriate individuals.

### 7 UPDATING COLLECTED INFORMATION

You have the right to review the personal information that ExecuPharm holds about you. You may access, review, correct, update, change, or request that ExecuPharm delete (right to be forgotten) the information we hold in our staffing database at any time. This information will be provided in line with the local data access law/policies. All requests to access and review personal data must be made via email to [privacy@execupharm.com](mailto:privacy@execupharm.com).

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### 8 QUESTIONS RELATED TO THIS POLICY

Questions or comments related to this policy can be directed by either:

- Sending an email to [privacy@execupharm.com](mailto:privacy@execupharm.com)
- Mailing ExecuPharm at 610 Freedom Business Center Drive, Suite 200, King of Prussia, PA 19406, USA. Attention: Privacy Officer

### 9 NOTIFICATION OF CHANGES

As ExecuPharm evolves and as privacy laws and regulations change, it may be necessary to revise or update our Privacy Policy. The current version of the Privacy Policy can be accessed via ExecuPharm's Learning Management System (LMS), or at the bottom of the ExecuPharm website ([www.execupharm.com](http://www.execupharm.com)).

### 10 ADDITIONAL INFORMATION FOR INHABITANTS OF THE EUROPEAN ECONOMIC AREA

Communications, queries, or requests to exercise informational rights (e.g., access to data) or complaints under the European Union General Data Protection Regulation (European Commission Regulation 2016/679 or GDPR) can also be addressed to the attention of Privacy Officer by either:

- Sending an email to [privacy@execupharm.com](mailto:privacy@execupharm.com)
- Mailing ExecuPharm at 610 Freedom Business Center Drive, Suite 200, King of Prussia, PA 19406, USA. Attention: Privacy Officer

Within the European Economic Area, individuals have the right in law to complain about how their information is handled to a supervisory authority (data protection authority) that is responsible for regulating compliance with the GDPR. A list of all EU supervisory authorities is available on the European Commission website:

[http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)

### 11 ADDITIONAL INFORMATION FOR CALIFORNIA CONSUMERS

This section applies solely California consumers (California residents) and explains your rights under the California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA).

#### 11.1 Sale or Sharing of Personal Information

In the preceding twelve (12) months, ExecuPharm has not sold or shared (for purposes of behavioral advertising) personal information.

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### 11.2 Access to Specific Information and Data Portability Rights

You have the right to request that ExecuPharm disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive your request and confirm your identity, we will disclose to you the information requested, including:

- The categories of personal information we collected about you
- The categories of sources of the personal information we collected about you
- Our business purpose for collecting that personal information
- The categories of third parties with whom we share that personal information
- The specific pieces of personal information we collected
- Information about any sales of your personal information

In addition, upon request we will provide you with a copy of all of your personal information (Data Portability).

### 11.3 Deletion and Correction Request Rights

You have the right to request that ExecuPharm delete any of your personal information that we collected from you and retained, subject to certain exceptions. You have the right to request that ExecuPharm correct any inaccurate personal information, subject to certain exception. Once we receive your request and confirm your identity, we will delete or correct your personal information from our records, unless an exception applies. If an exception applies, you will be notified that the data will not be deleted, along with specific information about the basis for the exception.

### 11.4 Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a request by either:

- Sending an email to [privacy@execupharm.com](mailto:privacy@execupharm.com)
- Mailing ExecuPharm at 610 Freedom Business Center Drive, Suite 200, King of Prussia, PA 19406, USA. Attention: Privacy Officer

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child.

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You may only make a request for access or data portability twice within a twelve (12) month period. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative
- Describe your request with sufficient detail to allows us to properly understand, evaluate, and respond to it
- Provide a means to contact you

We will only use personal information provided in a CCPA request to verify the requestor's identity or authority to make the request.

### 11.5 Response Timing

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

### 11.6 Fee

We do not charge a fee to process or respond to your CCPA request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of that decision and provide you with a cost estimate before completing your request.

### 11.7 Contact Information

If you have any questions or comments about this Notice, the ways in which ExecuPharm collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us by either:

- Sending an email to [privacy@execupharm.com](mailto:privacy@execupharm.com)
- Mailing ExecuPharm at 610 Freedom Business Center Drive, Suite 200, King of Prussia, PA 19406, USA. Attention: Privacy Officer

## REVISION HISTORY

Version	Date	Author	Description of Changes	Approver	Approval Date
2014-2021		On File	On File	On File	On File

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Version Date	Author	Description of Changes	Approver	Approval Date
08/SEP/2022	Katherine Olegario	Transferred content to current template, and reformatted content according. Included "on behalf of" as part of the Scope statement, updated age to 16 within Section 3, Revised information related to California Privacy Rights Act (CPRA) legislation.	Kristen D'Souza	08/SEP/2022