

SAI MedPartners

PRIVACY POLICY

Last updated: August 20, 2020

SAI MedPartners is committed to protecting your personal information and your right to privacy.

When you visit our website <https://www.sai-med.com> ("Site"), or participate or use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy, the information we collect, how we use it and what rights you have in relation to it. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our site and our services.

This privacy policy applies to all information collected through our Site, and/or through any related services, sales, marketing or events.

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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1. INFORMATION THAT WE COLLECT

Information You Disclose to Us.

We collect personal information that you voluntarily provide to us when you register at the Site, express your interest through email or the Site in obtaining information about us or our services or participate in our services, or otherwise contact us.

The personal information that we collect depends on the context of your interactions with us and the Site, and the choices you make. The personal information we collect from you may include the following:

Name and Contact Data. We collect your first and last name, email address, postal address, phone number, business title and affiliate, education credentials, and other similar contact data.

Credentials. (see Section 2. HOW WE USE YOUR INFORMATION).

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected.

We automatically collect certain information when you visit, use or navigate the Site. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. This information is primarily needed to maintain the security and operation of our Site, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. For more information about cookies, please see Section 4. COOKIES AND OTHER TRACKING TECHNOLOGIES.

Information collected from other Sources

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as LinkedIn), as well as from other third parties. Examples of the information we receive from other sources include: employment profile information (your name, title, qualifications, gender, email, current city, state and country, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

2. HOW WE USE YOUR INFORMATION

We use personal information collected via our Site and services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive in order to:

- Facilitate account creation and logon process with your Consent. Office 365 provides several applications which you might be granted access to (e.g. Sharepoint, Teams, OneDrive). When you log in to an Office 365 application or another application using Azure AD as the authentication provider, we will automatically gather and store certain information (i.e. your email address, IP address, device type, the browser used, the date and time of visit, pages visited).

Within Azure AD we will be able to identify you so that we can give you access within the respective Office 365 application or others. The legal basis for this processing activity is Article 6 (1) 1 lit. b of the European General Data Protection Regulation ("GDPR"), as we will generally grant you access when a contract shall be executed or if we envisage to enter into a contract.

Microsoft is our service provider for Office 365/Azure AD. Please read their information practices at [Microsoft Privacy statement](#).

- Send you marketing and promotional communications, including participation in our services, for Business Purposes and with your Consent. We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences and Consent. Once you have provided Consent, you can opt-out of our marketing emails at any time (see Section 10. YOUR PRIVACY RIGHTS).
- Send administrative information to you for Business Purposes, Legal Reasons and/or possibly Contractual. We may use your personal information to send you service and new feature information and/or information about changes to our terms, conditions, and policies.
- Deliver targeted advertising to you for our Business Purposes and/or with your Consent. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- Request Feedback for our Business Purposes and/or with your Consent. We may use your information to request feedback and to contact you about your participation in or use of our Site and services.

- To protect our Site for Business Purposes and/or Legal Reasons. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- To enable user-to-user or participant-to participant communications with your Consent. We may use your information in order to enable user-to-user or participant-to participant communications with each user's or participant's Consent.
- To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and/or possibly Contractual.
- To respond to legal requests and prevent harm for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- For other Business Purposes. We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

3. **INFORMATION THAT MAY BE SHARED WITH THIRD PARTIES**

We only share and disclose your information in the following situations:

- *Compliance with Laws.* We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- *Vital Interests and Legal Rights.* We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- *Vendors, Consultants and Other Third-Party Service Providers.* We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online

activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

Your personal data may be shared with the following third parties and partly their sub-processors:

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The legal basis for this data transfer and processing activity is Art. 28 GDPR in conjunction with the data processing agreements we concluded with respective third-party companies. Therefore, our contractors will only use your personal data to the extent necessary to perform their functions and will be contractually bound to process your personal data only on our behalf and in compliance with our requests.

We may disclose your personal data if legally entitled or required to do so (for example if required by law or by a court order). The legal basis for this processing is Art. 6 (1) 1 lit. c GDPR.

- *Business Transfers.* We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- *Affiliates.* We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- *With your Consent.* We may disclose your personal information for any other purpose with your Consent to the extent such use is described in the Consent.

4. COOKIES AND OTHER TRACKING TECHNOLOGIES

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our Site, we may collect information from you automatically through cookies or similar technology (like web beacons and pixels). For further information, visit allaboutcookies.org. We use cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

There are a number of different types of cookies, however, our website uses:

- **Functionality** – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

5. INFORMATION THAT MAY BE TRANSFERRED INTERNATIONALLY

Our servers are located in the United States. If you are accessing our Site or participating in our service from outside the US, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information.

If you are a resident in the European Economic Area, then these countries may not have data protection or other laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

European Commission's Standard Contractual Clauses: Such measures implementing the European Commission's Standard Contractual Clauses for transfers of personal information between us and our third-party providers, which require all such recipients to protect personal information that they process from the EEA in accordance with European data protection laws are utilized for applicable transfers. We have implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

6. THIRD-PARTY WEBSITES

The Site and email communications with us may contain advertisements from third parties that are not affiliated with us and which may link to other websites or online services. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Site or such communications. You should review the policies of such third parties and contact them directly to respond to your questions.

7. HOW LONG WE KEEP YOUR INFORMATION

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements), and subject to your rights to in Section 10 – YOUR PRIVACY RIGHTS. No purpose in this policy will require us keeping your personal information for longer than the period of time in which you have an account with us plus 2 years past the termination of your account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. HOW WE KEEP YOUR INFORMATION SAFE

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

9. INFORMATION FROM MINORS

We do not knowingly solicit data from or market to children under 18 years of age. By using the Site, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at Privacy@sai-med.com.

10. YOUR PRIVACY RIGHTS

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the following rights:

The right to be informed

The right to access

The right to rectification (correction)

The right to erasure (to be forgotten)

The right to restriction of processing

The right to data portability

The right to object

The right to not be subject to automated decision making.

For assistance in exercising your rights, please use the contact details provided below in Section 13 – HOW YOU CAN CONTACT US ABOUT THIS POLICY. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Account Information. You may at any time review or change the information in your account or terminate your account by:

- Contacting sales personnel and terminating any existing contracts
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce any terms of use or contractual obligations and/or comply with legal requirements.

Cookies and Similar Technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites.

Opting out of Email Marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below.

You will then be removed from the marketing email list – however, we may still need to send you service-related notifications that are necessary for the administration and use of your account. You can also opt-out by contacting us using the contact information provided below.

11. FOR CALIFORNIA RESIDENTS WITH SPECIFIC PRIVACY RIGHTS

If you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with us, you have the right to request removal of unwanted data that you publicly post or provide. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed publicly, but please be aware that the data may not be completely or comprehensively removed from our systems.

12. UPDATES TO THIS POLICY

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

13. HOW YOU CAN CONTACT US ABOUT THIS POLICY

If you have questions or comments about this policy, email us at Privacy@sai-med.com or by post to:

Sean Gordon

SAI-MedPartners Privacy Officer

4970 DeMoss Road
Suite 300
Reading, PA 19606
USA

If you are a resident in the European Economic Area, the "data controller" of your personal information has been appointed to be Sean Gordon as its representative in the EEA. You can contact them directly regarding the processing of your information by email at privacy@sai-med.com or by post to:

Sean Gordon

SAI-MedPartners Privacy Officer

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Suite 300
Reading, PA 19606
USA