

	Website (General) Privacy Notice
	Privacy Policy No. 006 Effective Date: March 25, 2019

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1. INTRODUCTION

Nuventra respects the relationships we have with our clients and respects the privacy of all data subjects whose personal data may be processed by Nuventra in the performance of our services and our normal business operations. To demonstrate our commitment to the protection of data transferred out of the European Union (EU) and the European Economic Area (EEA) for the performance of our services and business operations, we adhere to the General Data Protection Regulation (GDPR) [Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016] as described herein, which is directly applicable as law in all 28 EU countries. GDPR is the EU legal framework focusing on harmonizing the protection of personal data, which means any information relating to an identified or identifiable natural person or what it calls a “data subject”. The GDPR affects all organizations and public entities, wherever located, that handle data of persons residing in the EU. Nuventra will adhere to this regulation when collecting any data concerning an EU citizen.

This privacy policy applies to www.nuventra.com and the Nuventra related services which are hosted and operated by Nuventra and provided to its clients. This privacy policy describes how Nuventra collects and uses the personal information you provide on our web site at www.nuventra.com and through our related services. It also describes the choices available to you regarding our use of your personal information and how you can exercise your privacy rights with regard to this information.

2. GENERAL WEBSITE PRIVACY NOTICE

2.1. Personal Information Collection, Use, and Sharing

When you register with www.nuventra.com website or use the services made available to the public on the www.nuventra.com website, personal information is needed such as your name, company name, and email address. Nuventra uses and shares personal information for purposes such as processing and fulfilling your request, billing, service improvement, research, marketing, communicating with you and other general purposes. With regard to use of Nuventra services engaged by our clients, see the section below entitled Data Collected Through Nuventra Purchased Solutions.

Nuventra will not sell, rent, exchange or share personal information with any third parties without permission or except as described in this privacy policy. Nuventra will share personal information with government authorities and others in order to respond to investigations, court orders, legal process, or to investigate, prevent or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person, violations of Nuventra’s terms of service, or as otherwise required by law. If Nuventra is involved in a merger, acquisition, or sale of all or substantially all of its assets, you will be notified via email and/or a prominent notice on our web site of any such change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

2.2. Data Security

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and when we store and process it in our data center. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security and do not take responsibility for any third-party actions when we have endeavored to follow generally accepted standards. In addition, we do not take responsibility for your systems, the Internet itself or any third-party networks or services used to transmit data which are outside the firewall of the data center we use to process and store your personal data. If you have any questions about the security on our web site or our services, please contact us.

2.3. Email Marketing Choices

You may choose to stop receiving our marketing emails by following the unsubscribe instructions included in these emails or you can contact us. If you purchase a service, you can still opt out of marketing related emails however you cannot opt out of service related announcements.

If your personal information changes, you may correct, update, amend, delete/remove or deactivate it by contacting us by email or postal mail at the contact information listed below. We will respond to your request within 30 days. Note that different rules apply to personal information processed or stored in our purchased solutions. (See section below entitled Data Collected Through Nuventra Purchased Solutions).

2.4. Data Storage

We will retain your personal information for as long as your account is active or as needed to provide you services and for archival and marketing purposes. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Note that different rules apply to personal information stored in our purchased solutions. (See section below entitled Data Collected Through Nuventra Purchased Solutions).

2.5. Cookies

Nuventra uses a technology called “cookies” to store session information. A cookie is a small amount of data, which often includes an anonymous unique identifier, which is sent to your browser from a web site’s computers and stored on your computer’s hard drive. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. We use Session Cookies to track your Login status. This cookie is only ever transmitted over HTTPS. A persistent cookie remains on your hard drive for an extended period of time. We use Persistent Cookies to determine from where you were referred to our site, as well as the last user ID that you logged in as. Nuventra may set and access Nuventra cookies on your computer. Cookies are required to use certain services provided on the Nuventra website. You can remove persistent cookies by following directions

provided in your Internet browser's "help" directory. If you reject cookies, you may still use our site, but your ability to use some areas of our site will be limited.

2.6. Third Party Advertising

We may partner with a third-party ad network to manage our advertising on other sites. Our ad network partner would use cookies and web beacons to collect non-personally identifiable information about your activities on this and other web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by contacting us.

2.7. Blogs and Community Forums

Our web site may offer publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. We may display personal testimonials of satisfied clients on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, please contact us.

2.8. Social Media Features

Our web site may include social media features, such as the Facebook 'Like' button, and widgets, such as the 'Share This' button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our web site. Your interactions with these features are governed by the privacy policy of the company providing it.

2.9. Data Collected Through Nuventra Purchased Solutions

Nuventra is in the business of providing consulting services clients. Nuventra processes data and information under the direction of its clients regarding their drug development programs and, in part, as related to human subjects (including personal information) that participate in clinical trials ("Client Data"). Nuventra has no direct relationship with the individuals whose personal data it processes and stores for Nuventra clients and Nuventra will process, store and retain Client Data as per our agreement with our applicable client (including transferring the Client Data to the applicable client). Therefore, if you participated in a clinical study of one of Nuventra's clients and would no longer like to be involved with one of our clients or otherwise have issues related to your data that is included in Client Data (such as to correct, amend, or delete such data), please contact the client that you interact with directly.

To demonstrate our commitment to the protection of Personal Data transferred out of the European Union and the European Economic Area to the United States for the performance of our services and business operations, we adhere to the General Data Protection Regulation (GDPR) [Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016]. For the purposes of the EU-US Privacy Shield, the Swiss Privacy Shield and other global privacy laws, Nuventra acts as a processor/instruction taker which accesses and processes Client Data on behalf of its clients, which are the controller/owner of such data.

2.10. Data Retention

Nuventra will retain personal information from our web site and that we process on behalf of our clients for as long as needed to provide services to our clients. Nuventra will also retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

2.11. Children's Privacy

Nuventra does not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our web site is directed to children under the age of 13. If you learn that your child has provided us with personal information without your consent, you may alert us at privacy@nuventra.com. We will take steps to delete it if we learn we have collected it.

2.12. International Users

With respect to non-US users, by using our web site or services, in most cases you will transfer data to the United States. To the extent permitted by law, by choosing to visit our web site or otherwise provide information to us, you are agreeing to the transfer of your personal information to the United States and processing in accordance with this Privacy Policy.

3. DESCRIPTION OF YOUR RIGHTS RELATING TO YOUR PERSONAL INFORMATION

You have certain rights relating to your personal information under the local data protection laws that apply to you. Depending on the applicable laws and, in particular, if you are located in the European Economic Area or otherwise covered under the EU General Data Protection Regulation (GDPR), these rights may include the following, subject to the requirements and limitations of those laws:

- To access your personal information held by us (right to access);
- To rectify inaccurate personal information and, taking into account the purpose of processing the personal information, ensure it is complete (right to rectification);
- To erase/delete your personal information, to the extent permitted by applicable data protection laws (right to erasure; right to be forgotten);
- To restrict our processing of your personal information, to the extent permitted by law (right to restriction of processing);
- To transfer your personal information to another controller, to the extent possible (right to data portability);
- To object to any processing of your personal information carried out on the basis of our legitimate interests (right to object). Where we process your personal information for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection; and

- To the extent we base the collection, processing and sharing of your personal information on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

3.1. Exercising your rights relating to your personal information

To exercise your rights with regard to personal information collected and stored by Nuventra in connection with your use of the services made available to the general public by Nuventra on the www.nuventra.com website, Nuventra is the “controller” with regard to the processing of your personal information and you should contact us directly in connection with the exercise of your rights under applicable privacy laws. We try to respond to all legitimate requests within one month and will contact you if we need additional information from you in order to honor your request. Occasionally it may take us longer than a month, taking into account the complexity and number of requests we receive.

To exercise your rights with regard to personal information collected and stored by Nuventra in connection with the use of Nuventra solutions purchased by one of our clients, please inquire with the applicable client directly. Since Nuventra serves as a “processor” and such client is the “controller” Nuventra may only make changes to a client’s data upon instruction from that client. If you make your request directly to us, please provide to us the name of the Nuventra client who is the controller for your personal data, and we will refer your request to that client.

4. UPDATES TO THE PRIVACY POLICY

Nuventra may update this Privacy Policy and we may notify registered users of significant changes in the way we treat any personal information by sending a notice to the primary email address specified in your primary contact information or by placing a notice on our web site or within our solutions. However, we nevertheless reserve the right to amend our privacy practices and policy from time to time without prior notice. We encourage you to periodically review this document for the latest information on our privacy practices.

5. CONTACT US

For questions related to this Privacy Policy, please contact us:

Nuventra, Inc.
2525 Meridian Parkway, Suite 200
Durham, NC 27713
USA
1-888.615.5111
privacy@nuventra.com

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