



## Privacy Policy

This Privacy Policy explains how the Envision Pharma Group (Envision) handles personal information. "Personal information" is defined as information submitted to and/or collected by Envision via our company website and websites hosted by us for customers using our software products. Such information can be collected when an individual submits his or her name and/or address. Envision can also collect information about visits to the Envision websites without an individual actively submitting information through various automated digital means, such as cookies and internet tags. Although the information collected by such automated digital means does not directly identify specific individuals, internet web browsers automatically transmit information to the Envision websites regarding the software a user's computer is operating, such as IP Address and browser version. Information collected by these technologies cannot be used to identify individuals without additional identifiable information.

Any identifiable information individual users provide will be used only by Envision for the purposes of fulfilling a specific request. Envision will not share this information with any third party, except as stated above, without the consent of an individual user. Envision will not disclose any Personally Identifiable or Personal Health Information it gathers from an individual user, except as set forth in this Privacy Policy or as specifically agreed to by such individual user. Envision may release Personally Identifiable or Personal Health Information to third parties without user consent: (1) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena, or court order; or (2) in special cases, such as in response to a physical threat, to protect property, or defend or assert legal rights. In the event that Envision is legally compelled to disclose Personally Identifiable or Personal Health Information to a third party, Envision will attempt to notify the involved user unless doing so would violate the law or court order. In addition, Envision may disclose Personal Information as further described below.

Envision is in the business of providing hosted software solutions to our customers. If you provide personal information via one of our software applications branded for a customer, you are implicitly providing that information to that customer as well and should ensure you understand how your information may be used by them through their Privacy Policy which may be published on the branded site, or available on their corporate website.



Envision operations and maintenance contractors sometimes have limited access to Personally Identifiable Information in the course of providing products or services to Envision. Access to an individual user's Personally Identifiable Information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function for Envision. Envision requires its operations and maintenance contractors to: (1) protect the privacy of any individual user's Personally Identifiable Information consistent with this Privacy Policy, and (2) not use or disclose Personally Identifiable Information for any purpose other than providing Envision with products and services, as required by law.

## U.S.–EU & U.S. –Swiss Safe Harbor

Envision adheres to the Safe Harbor Principles agreed to between the United States Department of Commerce on the one hand, and the European Commission and the Federal Data Protection and Information Commissioner of Switzerland on the other, in connection with the transfer of personal information between member states of the European Economic Area and the United States, and Switzerland and the United States. For more information regarding the U.S.-EU & U.S.-Swiss Safe Harbor principles and Envision's policy addressing it, please see our Safe Harbor Privacy Policy below.

## Safe Harbor Privacy Policy

[We self-certify compliance with:](#)



Envision Pharma Group (“Envision”) respects individual privacy and is committed to maintaining the privacy and security of the personal information of our customers, employees, business partners, and others with whom we interact. This Safe Harbor Privacy Policy (the “Policy”) sets forth the privacy principles that Envision follows with respect to transfers of personal information between member states of the European Economic Area (“EEA”) and the United States, and Switzerland and the United States.

## SCOPE

This Policy applies to all personal information received by Envision in the United States from the EEA and/or Switzerland in any format including electronic or hard copy.



## DEFINITIONS

“Envision Pharma Group” means Envision Pharma Group and any of its subsidiaries, divisions, successors, and assigns.

“Personal information” means any information or set of information that identifies or is used by or on behalf of Envision to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

“Sensitive personal information” means personal information that reveals race, ethnic origin, political or religious beliefs, or personal information regarding health conditions.

## PRIVACY PRINCIPLES

The privacy principles in this policy are based on the Safe Harbor Principles.

## NOTICE

When Envision directly collects personal information from individuals in the EEA, it will (1) disclose the purpose for collecting and using the personal information, (2) describe the types of entities to whom disclosures may be made, (3) describe the choices and means, if any, offered by Envision to individuals to limit the use and disclosure of information, and (4) provide contact information to individuals where their inquiries or complaints can be addressed. Notice will be provided at the time when individuals are first asked to provide personal information or as soon as practicable.

## CHOICE

Envision will offer individuals the opportunity to opt-out of further uses or disclosures when their personal information will be disclosed to a non-agent third party or in connection with a purpose other than the purposes for which it was originally collected or authorized by the individual. If the use or disclosure involves sensitive information, Envision affords individuals the opportunity to explicitly opt-in to such use or disclosure when the sensitive information would be disclosed to a non-agent third party or in connection with a purpose other than the purposes for which it was originally collected or authorized by the individual.



## DATA INTEGRITY

Envision will use personal information in its possession only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Envision will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

## TRANSFERS TO AGENTS

Envision will obtain adequate assurances from its agents and other business partners that they will safeguard personal information in a manner consistent with this policy.

## ACCESS AND CORRECTION

Envision will grant individuals reasonable access to personal information that it holds about them, unless such access would compromise the purpose for which it was collected, such as blinded clinical research data during a trial. Envision will take reasonable steps to assist individuals with correcting, amending, or deleting personal information that is determined to be inaccurate or incomplete.

## SECURITY

Envision will take reasonable precautions to protect personal information in its possession from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

## ENFORCEMENT

Envision will verify its adherence to this Policy by conducting routine compliance audits of its relevant privacy practices. Envision will take appropriate disciplinary action, consistent with applicable laws, against any Envision employee who willfully violates or seeks to circumvent this Policy or who takes an action to compromise the integrity or safety of personal data.

## DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of personal information should be directed to the Envision Corporate Office at the address given below. Envision will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Envision and the



complainant, Envision has agreed to participate in the dispute resolution procedures of the panels established by the European data protection authorities and the Federal Data Protection and Information Commissioner of Switzerland to resolve disputes pursuant to the Safe Harbor Principles.

## LIMITATION ON APPLICATION OF PRINCIPLES

Adherence by Envision to these Safe Harbor Principles may be limited to the extent (1) required to respond to a legal or ethical obligation, or (2) expressly permitted by an applicable law, rule or regulation, such as processing data specifically requested by government agencies for the purpose of medical safety.

## CONTACT INFORMATION

Questions or comments regarding this Policy should be submitted to the Envision Corporate Office by mail as follows:

Envision Pharma Group  
Southport Crossing  
3530 Post Road  
Southport, CT 06890  
Tel: +1 203 480 0080  
Fax: +1 203 428 1415  
[policy@envisionpharma.com](mailto:policy@envisionpharma.com)

## CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. Envision will undertake annual self-certification in compliance with the Safe Harbor requirements for continued registration.

## COOKIES STATEMENT

Cookies are small text files that are placed on your device by websites that you visit. They are used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

Our websites may use both strictly necessary cookies and performance cookies. Strictly necessary cookies enable you to move from page to page within our websites and to use its features. These cookies are deleted when you close your browser. Performance cookies allow us to collect information, including the



number of visitors to our website; where they have come to our website from; the pages they visit; and the length of time they have spent on our website. We may use services such as Google Analytics or Leadlander, both of which use cookies to collect such information. We would use this information to compile statistics and to help us to improve our websites; however, these cookies do not in themselves collect information that identifies an individual.

You have the ability to accept or disable cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to disable cookies if you prefer. If you decide to disable cookies, you may not be able to access some areas of our website.

By continuing to use our website without changing your browser settings to disable cookies, you consent to our use of cookies as described above.