

Privacy Policy

This policy was last updated on the 5th October 2020.

Our commitment to your privacy

Access Infinity Ltd is committed to protecting and respecting your privacy. We take our responsibilities regarding the security of information that we have collected seriously. This privacy policy sets out how we use and protect the information that you provide to us. Please read this policy carefully. If you have any questions, please contact compliance@access-infinity.com.

This Privacy Policy provides information on:

- how we use your personal data;
- types of personal data we collect;
- sources of your personal information;
- legal grounds for processing your personal data;
- sharing your personal data;
- retention of personal data;
- how we use Cookies and other tracking technology;
- our policy on correcting and updating personal data;
- making a complaint about our handling of your Personal Information.

How we use your information?

People who participate in our market research projects

How we use your personal data Access Infinity and its suppliers use your personal data for conducting market research projects ('research') either as Access Infinity or on behalf of our clients. We use your personal data for the following purposes:

- Performance of research and analysis either as Access Infinity or on behalf of our clients;
- Monitoring and keeping records of communications between you and Access Infinity staff;
- Compliance with our contracts with our clients;
- Sharing of information, as needed, with translators, analysts, data processing companies, fieldwork agencies;
- Adherence and compliance with legal and regulatory obligations, requirements and guidance.

Types of personal data we collect

The nature of the personal data collected about you will depend on your relationship with Access Infinity and the type of work we conduct. Access Infinity occasionally uses a network of fieldwork partners to recruit participants to participate in a research project and conduct interviews. ('fieldwork partner'). Please read the fieldwork partner's privacy policy for further information about the data that they collect and what it is used for.

Typically, the fieldwork partner assigns a respondent identifier to minimise the personal data collected by Access Infinity.

Types of personal data that maybe collected include:

- Respondent identifier assigned by the fieldwork partner;
- Information submitted by you during a research interview or when completing a paper or internet questionnaire. This may include information on age, gender, nationality, health data: including, for example, disease specific experience or drug purchasing/prescribing history, Adverse Events;
- System access information, such as usernames, passwords and other personally identifiable information;
- Your bank account details;
- Remuneration, including honoraria/fees for service and expenses payment in relation to your participation in, and contribution to, programmes and services;
- Your contact details, such as title, name, email address, mobile/telephone number and company information such as job title/role, office location, mobile/telephone number.

Sources of your personal information

Most of the personal information Access Infinity processes is provided directly by you, or by the fieldwork partner.

Sometimes the sponsoring client may provide a list of names for the purposes of contacting potential respondents. Access Infinity will follow the client's instruction on processing the personal data but will ensure that the personal data is processed according to data protection legislation including assurance that the list of names can be legitimately used for the intended research purpose.

Legal grounds for processing your personal data

Under data protection legislation, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. Typically, for market research Access Infinity relies on Legitimate Interests and Consent. Access Infinity may also be required to use your personal data to comply with its legal obligation.

Consent

To process your personal data, we obtain your explicit consent. This means that before we collect any information from you, we ensure that you are provided with full details about the purpose and nature of the project and what will happen to the information we collect.

Withdrawal of your consent

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent. See section Your data protection rights below.

Legitimate interests

Examples of personal data that maybe processed using legitimate interests:

- Maintaining records relating to your participation in research projects;
- Adhering to legislation, governmental and regulatory bodies guidance. Adhering to good governance requirements, such as internal reporting and compliance requirements;
- Audit requirements;
- Monitoring and keeping records of communications between you, the fieldwork partner and Access Infinity staff.

Sharing your personal data

In some cases, we may need to share personal information with third parties that provide research services in support of the research project e.g. translators, analysts, data processing companies, fieldwork agencies. Any third party that receives personal information is obligated to follow all the same privacy protection regulations as followed by Access Infinity.

Retention of personal data

Access Infinity will not retain your personal information for longer than is necessary. At the end of the research project Access Infinity redact (remove) the personal data no longer required for the project. This means that most of the personal data collected during the research project is deleted and there is minimal personal data retained by Access Infinity.

How long do we keep your personal data for?

We are required by law to keep your personal data only for as long as is necessary for the purposes for which we are using it. The period for which we keep your personal data will be determined by several criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations. We keep a backup of our data to restore the original data after a data loss event. When we delete your personal data, it will be deleted from the live storage immediately but there will be a delay before it is removed from the backup data.

Who do we share your information with?

We use selected agents to process your information on our behalf, such as software providers to host our website. Such third parties will be authorised to see and use your information but only to fulfil their contractual obligations to us and will not be permitted to use it for any other purpose. We retain full responsibility for how your personal information may be used by such agents. The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff of Access Infinity who are operating outside the EEA. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. We may share your personal information so that we can comply with a legal obligation to which we are subject. For example: where we are obliged to share your personal information with regulatory bodies which govern our work and services; government departments such as law enforcement and HMRC; court orders etc.

We will process your personal information where there is a legitimate interest in us doing so if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). For example, if you are requesting information about a service from a member of Access Infinity, then we may pass your personal data onto another member of the company to enable them to appropriately respond to your request. Again, unless you consent to the contrary, that member shall only use your personal data to provide the information you have requested. We may share your data when conducting research, if you apply to work with us and if you are employed by us. See the relevant sections in this privacy policy. Access Infinity does not sell, trade or rent your personal information.

Transfers of personal data outside the EEA

In connection with our business and for employment, administrative, management and legal purposes, we may transfer your personal data outside the EEA to members of our company and processors in the United States and other jurisdictions in which we are established. Some of our systems are hosted in the United States. We will ensure that the transfer is lawful and that there are appropriate security arrangements. Where we need to transfer your information outside of the European Economic Area, we only do so to countries which have been determined by the European Commission to have an adequate level of data protection or by using a variety of legal mechanisms, including the US Privacy Shield and Standard Contractual Clauses, to help ensure your rights and protections. Additional information about the Privacy Shield, can be found at <https://www.privacyshield.gov/>.

How we protect your information?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions,

and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. To protect your personal data Access Infinity employ:

- technical measures, including but not limited to, robust network security, firewalls, anti-virus protection, regular internal and external oversight and inspection, including penetration testing, access controls, audit trails, encryption of devices and data both whilst at rest and during any transmission to and from third parties in order to keep your personal data secure.
- organisational measures including, but not limited to, training of all individuals who process personal data in data protection and information governance, the creation of and adherence to appropriate policies and procedures.

Your data protection rights

You have specific rights connected to provision of your personal information to Access Infinity, although in some cases these rights are subject to certain conditions and limitations. To exercise any of these rights please contact us using the contact details in section Contact details below.

Right to be informed

You have the right to be told how your personal information is/will be used. This Privacy Policy is intended to provide a clear and transparent description of how your personal data may be used.

Right of access to your information

You can request a copy of the information held relating to you. Please ensure that you include your name and clear instructions on what you would like us to do. If you require us to supply you with details of the personal information that we hold about you, then we will provide this information free of charge and we will provide this information to you within one month of your request unless the request is complex or there are numerous requests. If this is the case, we will inform you within one month of your request about the reason for the extension of time.

Right of erasure (right to be forgotten)

You have the right to have your personally identifiable data deleted.

Right of rectification

If you believe the records that Access Infinity keeps are inaccurate, you have the right to ask for these to be updated.

Opt-out of marketing communications

You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. You can also opt out of other forms of marketing (such as postal marketing or telemarketing), by contacting us.

Withdraw your consent

If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. 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 information conducted in reliance on lawful processing grounds other than consent.

Complaints

If you have complaints relating to our processing of your personal data, you should raise these with the Access Infinity compliance department; our contact details are below, or you can raise directly with the relevant supervisory authority.

In the UK: Information Commissioner's Office (ICO). They can be contacted via their website <https://ico.org.uk/>

Contact details Access Infinity, ATTN: Compliance Team, 2 Attfield Close, London N20 0LG

Email: compliance@access-infinity.com

Changes to this privacy policy

We keep our privacy policy under regular review and reserve the right to revise it at any time. Any changes we may make to our privacy policy in the future will be posted on this page. There is a date at the beginning of this policy which indicates the date it was updated. Please revisit this policy each time you consider giving personal information.