

Privacy Policy

V2.0: last revised September, 2018

Our commitment to your privacy

Envision Health Partners LLC 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 mraghavan@envisionhealthllc.com

If you have requested information from Envision Health Partners LLC, we will collect and process the personal data that you provide in order to respond to your request. Unless you consent to the contrary, we shall only use your personal data to provide the information you have requested.

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession

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).

Controllorship and processing of contact information and survey data

1. Recruitment of respondents through fieldwork partners

In case we do not receive any contact lists or other personal data from the client who commissioned the survey, Envision Health Partners LLC is the data controller for the survey data and meta data.

Envision Health Partners LLC processes your survey data under your pseudonym with your consent given either to the fieldwork agency who invited you to the survey or to us directly by agreeing to take part in the survey.

2. Surveys among respondents whose contact information Envision Health Partners

LLC receives from clients

For some surveys, the client who commissioned the survey provides us with contact information, in the form of “contact lists”, of potential respondents. In these cases, Envision Health Partners LLC conducts the survey on behalf of the client under a data processing agreement pursuant to applicable data protection law, and the client is the data controller for the contact information and the survey data.

With the authorization by the client, we transfer such contact lists to fieldwork partners who may use the contact information in two ways:

- (1) to match individuals from the contact lists with their own database, if any, and to invite people from the contact list who were found on their database to the survey,
- (2) in the absence of an own database at the fieldwork partner or if the overlap of the contact list and an existing database is not large enough in order to achieve the required number of completed surveys, to contact individuals from the contact list directly in order to invite them to the survey.

We collect your answers to the survey under your pseudonym.

How we use your personal data

Market Research : To understand your views about certain products and services or to understand your behavior in different situations. We may use a unique Identifier, contact details, email address, voice, image, opinion. We never attach contact information to survey data that we share with clients. Typically, we aggregate the survey data with the survey data of other respondents. In some cases we may report the survey data on a respondents’ level, using your pseudonym instead of your name. This means that a client cannot attribute your answers to you as an individual.

We may be required to use and retain personal data for legal and compliance reasons, such as the prevention, detection, or investigation of a crime, loss prevention, fraud or any other abuse of our services and IT systems. We may also use your personal data to meet our internal and external audit requirements, information security purposes, or to protect or enforce our rights, privacy, safety, or property, or those of other persons.

We use contact information to transfer it to fieldwork partners for them to communicate with respondents in relation to the survey, such as to invite them to the survey and to remind them to take the survey.

How we share personal data

We will disclose your personal data only for the purposes and to those third parties, as described below – unless with your specific consent to transfers of personal data to other categories of third parties given elsewhere. Envision Health Partners LLC will take appropriate steps to ensure that your personal data are processed, secured, and transferred according to applicable law.

Pharmacovigilance requirements

Report Adverse Events during our studies to competent authorities. We may use the unique Identifier, contact details, email address, disease, treatment, product taken and adverse events.

External service providers

Where necessary, we will commission other companies and individuals to perform certain tasks contributing to our services on our behalf within the framework of data processing agreements. For example, we provide personal data to fieldwork partners. We may use, at our discretion, service providers, contractors or partners for hosting our databases and applications, for data processing services, or to send you information that you requested. We provide personal data to fieldwork partners for the purpose of recruiting or interviewing in the course of market research projects. We will only share with or make accessible such data to external service providers to the extent required for the respective purpose. This data may not be used by them for any other purposes, in particular not for their own or third party purposes. Envision Health Partners LLC's external service providers are contractually bound to respect the confidentiality of your personal data.

Public bodies

We will only disclose your personal data to public bodies where this is required by law. Envision Health Partners LLC will for example respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence.

International transfers of personal data

Under specific circumstances, it will also be necessary for Envision Health Partners LLC to transfer your personal data to countries outside the European Union/ European Economic Area (EEA), so called "third countries". Any transfers of personal data to third parties outside the Envision Health Partners LLC will be carried out with your prior knowledge and, where applicable, with your consent. Where these transfers are across borders or outside the EEA we shall put safeguards in place to ensure the transfer is made by a legitimate method for the purposes of EU data protection law and secure.

Security

Envision Health Partners LLC takes data security seriously. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements. Access to your personal data is granted only to those personnel, service providers or Envision Health Partners LLC affiliates with a business need-to-know or who require it in order to perform their duties.

In the event of a data breach containing personal data, Envision Health Partners LLC will follow all applicable data breach notification laws.

Your legal rights

As a data subject, you have specific legal rights relating to the personal data we collect from you. Envision Health Partners LLC will respect your individual rights and will deal with your concerns adequately.

The following list contains information on your legal rights which arise from applicable data protection laws:

- Right to change your mind and to withdraw your consent
- Right to access your personal data

- Right to rectify your personal data
- Right to erase your personal data from our systems, unless we have legitimate interest reasons for continuing to process the information
- Right to port your personal data (portability right)
- Right to restrict processing of your personal data
- Right to object to the processing of your personal data
- Right to lodge a complaint: In case of an alleged infringement of applicable privacy laws, you may lodge a complaint with the data protection supervisory authority in the country you live in or where the alleged infringement occurred.

Please note:

Time period: We will try to fulfill your request within 30 days. However, the period may be extended due to specific reasons relating to the specific legal right or the complexity of your request.

Restriction of access: In certain situations we may not be able to give you access to all or some of your personal data due to statutory provisions. If we deny your request for access, we will advise you of the reason for the refusal.

No identification: In some cases, we may not be able to look up your personal data on the basis of the identifiers you provide in your request. For example, we cannot look up your survey data and meta data when you provide your name and email address and were invited to a survey by an external fieldwork partner. In such cases, where we cannot identify you as a data subject, we are not able to comply with your request to execute your legal rights as described in this section, unless you provide additional information enabling your identification. You may wish to make inquiries in exercise of your legal rights with the fieldwork partner who invited you to the survey rather than with Envision Health Partners LLC directly. This way you do not have to disclose your identity to us, the fieldwork partner is able to authenticate your request and forward it to us by reference to your pseudonym. In this case, we will handle your inquiry as if you had made it with us directly.

Exercise your legal rights: In order to exercise your legal rights, please contact us in writing or text from, e.g. by email or letter. You may reach mraghavan@envisionhealthllc.com.

Retention of your personal data

In general, we will delete the personal data we collected from you if they are no longer necessary to achieve the purposes for which they were originally collected. However, we may be required to store your personal data for a longer period due to statutory provisions. The retention period may also depend on client instructions for studies where the client is the data controller and provided us with your contact information.

Changes to this Privacy Notice

We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this Privacy Notice at any time. For this reason, we encourage you to refer to this Privacy Notice each time before you take a survey. This Privacy Notice is current as of the "last revised" date indicated above.

We will treat your personal data in a manner consistent with the Privacy Notice under which they were collected, unless we have your consent to treat them differently.

If you are apply to work at, or are employed at **Envision Health Partners LLC**

If you apply to work at **Envision Health Partners LLC** we will only use the information you supply to us to process your application and to monitor recruitment statistics. Where we need to disclose information to a third party, for example if we want to take up a reference, we will not do so without informing you beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates, including the results of any assessments, may be held for 6 months after the recruitment exercise has been completed, if we feel there maybe future suitable vacancies and we want to keep your details longer we will ask your permission. It will then be destroyed or deleted. We retain de-personalized statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

For some vacancies we may advertise through a recruitment agency. Please read the recruitment agencies privacy policy for further information about the data that they collect and what it is used for.

If employed: We will compile a file (in both electronic and paper formats) relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment.

We will ask you to provide us with certain personal data. We may collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout any period of you working for us.

This data will include your personal contact details (such as name, title, addresses, telephone numbers, and personal email addresses), your date of birth, gender, marital status and dependants, next of kin and emergency contact information, national insurance number, bank account details, payroll records, tax status information, salary, annual leave, pension and benefits information, start date, location of employment or workplace, recruitment information (including copies of identity documentation, right to work documentation, references and other information included in a CV or cover letter or as part of the application process), employment records (including job titles, work history, working hours, training records and professional memberships), performance information, disciplinary and grievance information, CCTV footage and other information obtained through electronic means such as swipe card records, information about your use of our information and communications systems and your photograph. Other work related information may be processed.

We will process your personal data for the following purposes:

- Where it is necessary to perform a contract we have entered into with you (the legal basis of 'performance of a contract'), for example to pay you.
- Where we need to comply with a legal obligation (the legal basis of 'compliance with a legal obligation').

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (the legal basis of 'legitimate interests'). For example: to process your application; review and better understand employee retention and attrition rates; monitor emails for security purposes.

Envision Health Partners LLC may also need to process information you provide or that we fairly obtain about your criminal convictions and offences (including alleged offences), your health (including any medical condition, health and sickness records), race, ethnic origin, religious beliefs, sexual orientation, your biometric information, for example, your fingerprint or voice print for security purposes, political opinions and trade union memberships ('Special Category Data'). We may process your Special Category Data in the following circumstances:

- with your explicit consent (the legal basis of 'consent');
- where we need to carry out our legal obligations or exercise rights in connection with employment (the legal basis of 'carrying out the obligations and exercising specific rights in the field of employment'), for example to provide you with contractual sick pay;
- where it is needed in the public interest (the legal basis of 'public interest'), such as for equal opportunities monitoring and reporting;
- where it is needed in relation to legal claims (the legal basis of 'the establishment, exercise or defense of legal claims'), for example at an employment tribunal.

We retain your personal data including any Special Category Data while you work for **Envision Health Partners LLC** and, after you cease working for **Envision Health Partners LLC**, for as long as is necessary to fulfil our contractual obligations to you, for applicable legal, accounting, or reporting requirements and to provide you with information at your request (such as references).

Contact information

Please direct your questions regarding the subject matter of data protection and any requests in the exercise of your legal rights to mrghavan@envisionhealthllc.com or a letter to the postal address: 29 Hearthstone Drive, Riverside, CT 06878.