

## **PRIVACY POLICY**

Intrials values and recognizes the importance of privacy. Therefore, we created a Privacy Policy as a way to demonstrate our commitment, under the terms of the Data Protection Law. Intrials adopts the best Information Security practices, prioritizing transparency, security and protection of the Personal Data of our customers and suppliers.

This privacy policy (“Privacy Policy” or “Policy”) deals with how we collect, obtain, use, store, protect and treat the information and data to which we have access. Please read this Privacy Policy carefully. This Policy applies to all Subjects who provide any Personal Data to Intrials.

### **1. Activity**

1.1 Intrials' main activity is to provide clinical trial management services, mainly to the pharmaceutical and biotechnology industry. Our activities do not involve the processing of personal data on a large scale.

### **2. Definitions**

2.1. The terms contained in this Policy, whenever used with the first letter in capital, will have the meaning established below, whether in the plural or in the singular. In the absence of a definition established in this chapter, the interpretation given by law will be attributed.

I. **Intrials**: means INTRIALS GROUP, with offices based in Brazil (São Paulo), United States (Delaware), Colombia (Bogotá), Peru (Lima), Chile (Santiago), Mexico (Mexico City) and Argentina (Buenos Aires)

II. **Accept** or **Accepted**: means the act of the Subject clicking on the box “I agree with the Privacy Policy”. Such act implies the free, informed and unequivocal statement by which the Subject agrees with all the provisions of said documents.

III. **Subject**: means the natural person to whom the Personal Data belong.

IV. **Personal Data**: means information that allows the identification, directly or indirectly, of the Subject.

V. **Sensitive Personal Data**: means Personal Data about racial or ethnic origin, religious conviction, political opinion, union membership or organization of a religious, philosophical or political nature, data referring to health or sex life, genetic or biometric data, when linked to a natural person.

VI. **Treatment**: means any operation performed with Personal Data, such as the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction; and

VII. **Data Protection Laws**: means all legislation applicable to the Processing of Personal Data, according to the territorial scope, which include, but are not limited to: Law No. 13,709/2018 (General Data Protection Law – Brazil); Regulation 2016/679

(General Data Protection Regulation – European Union); other territorial laws of the United States, Peru, Chile, Argentina, Colombia, Mexico, among others.

### 3. Collection of Personal Data and Purposes

3.1 Intrials may collect Personal Data and Sensitive Personal Data when you voluntarily participate in medical-pharmacological research, access the website, or when contacting you through the website, email, telephone, LinkedIn or any other means of communication made public by the company, as shown below:

| Collected data                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Purposes                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Full name; identification document; date of birth; age; gender; address; marital status; name of father, mother and spouse; email; phone number; applicable health system identification number or health insurance number; Weight; height; continuous use drugs; blood type; healthy personal and family history; medical condition; medical records; image, voice, video – in the case of remote meetings; and other data necessary to carry out the research | <ul style="list-style-type: none"> <li>• For clinical studies and research.</li> <li>• We use your data to hold face-to-face or virtual meetings, telephone discussions or general discussions regarding the research.</li> </ul>                                                                              |
| Contact details such as name, email, telephone and address.                                                                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>• To answer your questions, compliments, complaints, suggestions when you send us a message through the <b>Contact Us</b> page on our website.</li> <li>• For holding meetings, in person or virtually, telephone discussions or for discussions in general.</li> </ul> |
| Data provided in your resume (name, address, date of birth, telephone, e-mail, academic history, professional history, desired position, objectives, skills, as well as any other information that you spontaneously include in the resumes you send us).                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>• To recruit new members, contacting them and allowing them to participate in all stages of the respective selection processes.</li> </ul>                                                                                                                              |
| Service provider registration data (name, address, telephone, e-mail and document data)                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>• For the management of our commercial relationship and operationalization of the services provided.</li> </ul>                                                                                                                                                         |

| When accessing the Intrials website, the following will be collected:                                                           |                                                                                         |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| Cookies; geographic location; date and time of access to the website; IP address; and other data collected by Google Analytics) | <ul style="list-style-type: none"> <li>To comply with our legal obligations.</li> </ul> |

3.2 In addition, the Personal Data processed may also be used in the way we deem necessary or appropriate: (a) for the regular exercise of rights in judicial, administrative or arbitration proceedings; (b) to comply with a legal or regulatory obligation; (c) to enforce the Terms of Use; (d) for our Legitimate Interest; and (e) as otherwise permitted by law.

3.3 Intrials retains Personal Data only for the time necessary to fulfill the purposes for which it was collected, or for the time necessary to comply with our legal obligations, to defend Intrials' rights, or as long as we have a legitimate interest in carrying out the treatment of the information.

**Exclusive provision for applicants to Intrials job openings:**

3.4 Your Data will be processed for the sole purpose of enabling your participation in the selection process for the vacancy in question. Your Data may be used to facilitate interviews during the selection process, obtain and check personal and professional references, develop and promote diversity policies, comply with legal/regulatory obligations and prepare reports. For some positions that require access to financial, strategic or sensitive data, we may conduct a background check process.

**4. DATA SHARING**

4.1 Intrials always protects the identity of the Subjects. Personal Data may be shared with third parties in the cases set out below and/or provided for by law.

I. Intrials will share the data resulting from the Processing of Personal Data during the research with the research sponsor, provided that they are duly anonymized and/or protected by means of a confidentiality agreement.

II. Personal Data and Sensitive Personal Data, obtained for the purpose of studies and clinical research, will be available for consultation by researchers and sponsors in the research stages and during the post-study period.

III. By court order, arbitration or at the request of administrative authorities.

IV. Intrials may share with service providers or partners to manage or support certain aspects of our business operations on our behalf, such as hosting and data storage service providers, fraud management, selling on our behalf, order fulfillment, content personalization, advertising and marketing activities (including digital and personalized advertising), IT services, among others.

4.2 Intrials reserves the right to share data with third parties, in the event of any corporate reorganization, merger, sale, joint venture, assignment, transmission or transfer of all or part of our business, assets or capital (including those relating to bankruptcy or similar proceedings).

4.3 Data may be shared with third parties when this is essential and inherent to the purposes already described.

## **5. INTERNATIONAL DATA TRANSFERS**

5.1 International transfer may occur in the following cases:

- a) For other Intrials units located abroad;
- b) For sponsors located abroad.

5.2 Intrials undertakes to share data securely, for countries whose Personal Data protection legislation is compatible with local legislation or in accordance with the responsible regulatory authority.

## **6. SUBJECTS RIGHTS**

6.1 You may, at any time, request to Intrials:

- (i) confirmation that your Personal Data is being processed;
- (ii) access to your Personal Data;
- (iii) corrections to incomplete, inaccurate or outdated data;
- (iv) anonymization, blocking or deletion of data that is unnecessary, excessive or processed in violation of the provisions of law;
- (v) portability of Personal Data to another service provider, provided this does not affect our industrial and trade secrets;
- (vi) deletion of Personal Data processed with your consent, to the extent permitted by law;
- (vii) information about entities to which your Personal Data has been shared;
- (viii) information on the possibility of not providing consent and on the consequences of refusal; and
- (ix) revocation of consent.

6.2 Your requests will be treated with special care so that we can ensure the effectiveness of your rights. You may be asked to provide proof of your identity to ensure that only the data subject exercises their rights over their Personal Data.

6.3 You should be aware that, in certain cases (for example, due to legal requirements), your order may not be immediately fulfilled, in addition, Intrials may not be able to fulfill it due to compliance with legal obligations.

6.4 You can exercise your rights by contacting our Data Protection Officer via email [dpo@intrials.com.br](mailto:dpo@intrials.com.br).

## **7. SECURITY OF PERSONAL DATA**

7.1 We adopt the appropriate technical and organizational measures provided for by the Data Protection Laws for the protection of your Personal Data in our organization.



7.2 No data transmission or storage system is guaranteed to be 100% secure. Therefore, it is not possible to guarantee absolute security of our database, nor can we guarantee that your data cannot be intercepted when the transmission is made over the internet, cases in which Intrials cannot be held responsible. In any case, we always try to prevent leaks from occurring by adopting a high level of protection, carrying out all the necessary safety tests.

7.3 If you have reason to believe that your interaction with us is no longer secure (for example, if you believe that the security of your data has been compromised), please let us know immediately.

## **8. UPDATES TO THIS PRIVACY POLICY**

8.1 Intrials is assured the right to change the Privacy Policy at any time, without prior notice to the Subjects, so that it is the Subject's duty to keep an eye out for possible updates of said documents, which will be immediately available in the channels usually used by Intrials, and the modifications will come into effect on the date of publication of the new version of the Privacy Policy.

8.2 We remind you that Intrials is committed not to treat your Personal Data in a way that is incompatible with the purposes described above, unless otherwise required by law or court order.

8.3 If there are any significant changes, we may ask for your consent as a condition of your continued use of our Site.

## **9. AUTOMATIC DATA COLLECTION**

9.1 In accordance with this Privacy Policy, we may collect your Personal Data in a number of ways, including but not limited to:

9.2 Via browser or device: Some information is collected by most browsers or automatically through Internet access devices, such as the type of computer, screen resolution, operating system name and version, device model and manufacturer, language, type and version of the Internet browser you are using. We may use this information to ensure that the Site functions properly.

9.3 Use of cookies: Information about your use of the Site may be collected by third parties through cookies. Cookies are information stored directly on the computer you are using. Cookies allow the collection of information such as browser type, time spent on websites, pages visited, language preferences, and other anonymous traffic data. We and our service providers use information for security protection, to make navigation easier, to display information more efficiently and to personalize your experience when using the site, as well as for online tracking. We also collect statistical information about Site usage to continually improve our design and functionality, to understand how the Site is accessed, and to assist you in resolving questions relating to the Site.

9.4 If you do not want your information to be collected through cookies, there is a simple procedure in most browsers that allows cookies to be automatically rejected, or give you the option of accepting or rejecting the transfer of a specific cookie (or cookies) from a particular website to your computer. However, this may cause inconvenience in the use of the Site.



9.5 The settings you choose may affect your browsing experience and the functioning of some features that require the use of cookies. In this sense, we reject any responsibility for the consequences resulting from the limited functioning of our Site caused by the deactivation of cookies on your device (inability to set or read a cookie).

9.6 **GOOGLE ANALYTICS:** Intrials uses Google Analytics, a web analysis service provided by Google Inc., to evaluate the use of the Site. For more information on data protection with Google Inc., please visit the Google Analytics Privacy Policy at: <https://policies.google.com/privacy?hl=en-US>.

## **10. DATA PROTECTION AND CONTACT OFFICER**

If you have a question about how your personal information is being treated, you can consult our Data Protection Officer at the following email: [dpo@intrials.com.br](mailto:dpo@intrials.com.br)

We will respond to your request within a reasonable time, in line with the Law.

Last update of this Privacy Policy: May/2023.