

Salus IRB Privacy Policy

Last modified: [6 May 2021]

1. Introduction

This Privacy Policy describes how Salus IRB collects and uses Personal Data about you through the use of our Website and through email, text, and other electronic communications between you and Salus IRB.

RCRC Independent Review Board, LLC d/b/a Salus IRB (“**Salus IRB**,” “**we**,” “**our**,” or “**us**”) respect your privacy and are committed to protecting it through our compliance with this policy.

This Privacy Policy (our “**Privacy Policy**”) describes the types of information we may collect from you or that you may provide when you visit the websites www.salusirb.com (the “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Certain features of the Website are available to research participants for use in a research study (“**Study**”). The terms in this Privacy Policy apply to the types of information collected through the Website. In connection with the Study, you will or may have already signed an Informed Consent Form. In the event of a conflict between the terms of this Privacy Policy and the terms of the Informed Consent Form as applicable to Salus IRB, the Informed Consent Form terms shall prevail. The principal investigator and other members of the Study team will conduct the Study and are responsible for providing you with a notice describing their collection and use of your health information to the extent required by law, not Salus IRB. If you do not agree to be bound by those terms, you are not authorized to access or use our Website, and you must promptly exit our Website.

This policy applies to information we collect:

- on our Website;
- in email, text, and other electronic messages between you and our Website; and
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by Salus IRB or any third-party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using the Website, you agree to this Privacy

Policy. This Privacy Policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

2. Children Under the Age of 18

Our Website is not intended for children under the age of 18 and children under the age of 18 are not permitted to use our Website. We will remove any information about a child under the age of 18 if we become aware of it.

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to the Website. We do not knowingly collect Personal Data from children under 18. If you are under 18, do not use or provide any information on our Website or on or through any of its features, including your name, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Data from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from a child under 18, please contact us at privacy@salusirb.com.

3. Information We Collect About You and How We Collect It

We collect different types of information about you, including information that may directly identify you, information that is about you but individually does not personally identify you, and information that we combine with our other users. This includes information that we collect directly from you or through automated collection technologies.

Generally

We collect several types of information from and about users of our Website (collectively, “**Personal Data**”):

- by which you may be personally identified, such as name, e-mail address, telephone number, your medical history, your race or ethnicity, gender, and health information; and
- about your Internet connection, the equipment you use to access our Website and usage details, such as traffic data, logs, referring/exit pages, date and time of your visit to our Website, error information, clickstream data, and other communication data and the resources that you access and use on the Website.

We collect this information:

- directly from you when you provide it to us;
- automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, and other tracking technologies; and
- from third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Website is:

- information that you provide by filling in forms on our Website. This includes information provided at the time of using our services. We may also ask you for information when you report a problem with our Website;
- records and copies of your correspondence (including email addresses), if you contact us; and
- your search queries on the Website.

The Personal Data we collect from you is required for Salus IRB to perform services for a clinical trial you may be participating in, and to perform under the contract between us and the Study team or Study site. You may refuse to provide such Personal Data or withdraw your consent to our processing of Personal Data at any time; however, you may not be able to continue participation in the clinical trial.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns:

- details of your visits to our Website, such as traffic data, logs, referring/exit pages, date and time of your visit to our Website, error information, clickstream data, and other communication data and the resources that you access and use on the Website;
- location information of your device, such as your zip code, for authentication of your account; and
- information about your computer and Internet connection, specifically your IP address, operating system, browser type.

The information we collect automatically may include Personal Data or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- improve our product and services offering;
- store information about your preferences, allowing us to customize our Website according to your individual interests; and
- recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** We and our service providers may use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our Website through your computer or mobile device. A “cookie” is a small piece of data sent from a website and stored on the user's computer by

the user's web browser while the user is browsing. On your computer, you may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser or operating system setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

- **Google Analytics.** We use Google Analytics, a web analytics service provided by Google, Inc. (“**Google**”) to collect certain information relating to your use of the Website. Google Analytics uses cookies to help the Website analyze how users use the site. You can find out more about how Google uses data when you visit our Website by visiting “How Google uses data when you use our partners' sites or apps”, (located at www.google.com/policies/privacy/partners/). We may also use Google Analytics Advertising Features or other advertising networks to provide you with interest-based advertising based on your online activity. For more information regarding Google Analytics please visit Google's website, and pages that describe Google Analytics, such as www.google.com/analytics/learn/privacy.html.

4. How We Use Your Information

We use your Personal Data for various purposes described below, including to:

- provide our Website and its content to you;
- provide you with information you request from us; and
- enforce our rights arising from contracts.

We use information that we collect about you or that you provide to us, including any Personal Data:

- to present our Website and its content to you;
- to provide you with information or services that you request from us;
- to fulfill any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts entered into between the Study team performing the clinical trial and us, including for billing and collection;
- to notify you about changes to our Website or any services we offer or provide through them;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers’ target audiences. Even though we do not disclose your Personal Data for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Some information Salus IRB collects constitutes clinical trial information subject to the Federal Policy for the Protection of Human Subjects, also known as the Common Rule, good clinical practice guidelines issued by the International Council for Harmonisation or the human subject protection requirements of the United States Food and Drug Administration (“**Study Data**”). A Study team member will provide you with an Informed Consent Form describing the collection, use and disclosure of your health information for the Study. Salus IRB will use and disclose Study Data only as permitted in Salus IRB’s agreements with the Study sponsor, clinical research organization, Study site, and the principal investigator(s) (collectively, the “**Study team**”), as applicable, and we only collect the Study Data we need to fully perform our services and to respond to you or Study team. We may use your Study Data to contact you to the extent permitted by law, to provide our services, to provide information to the Study team, to obtain payment for our services, to respond to your inquiries, and to respond to inquiries and requests from the Study team, or in any other way we may describe when you provide the information to us or the Study team. We may combine your information with other information about you that is available to us, including information from other sources, such as from the Study team, in order to maintain an accurate record of our participants. Study Data will not be used for any other purpose, including marketing, without your consent.

5. Disclosure of Your Information

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Policy. We disclose your Personal Data to a few third parties, including:

- our subsidiaries and our affiliates;
- our third-party service providers that we use to support our business;
- to a company we merge, acquire, or that buys us, or in the event of change in structure of our company of any form;
- to comply with our legal obligations;
- to enforce our rights; and
- with your consent.

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Policy. However, we may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this Privacy Policy:

- to our subsidiaries and affiliates to market their products or services to you if you have not opted out of these disclosures. For more information, see [Choices About How We Use and Disclose Your Information](#);
- to contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. These entities provide IT and infrastructure support services;

- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Salus IRB’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Salus IRB about our Website’s users is among the assets transferred;
- to fulfill the purpose for which you provide it. For example, if you sign an Informed Consent Form for a Study, we will transmit your Informed Consent Form and your email address to the Study team;
- for any other purpose disclosed by us when you provide the information; and
- with your consent.

We may also disclose your Personal Data:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce our other agreements with the sponsor of the Study or the Study team, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Salus IRB, our customers, or others.

6. Choices About How We Use and Disclose Your Information

We offer you choices on how you can opt out of our use of tracking technology and other targeted advertising.

You may withdraw your consent to the collection of Personal Data for the Study at any time. If you do take away your consent, no new information will be taken, and you may also request that no new analysis on your information will be done.

During the Study, we will collect Personal Data through the Website, which will be used for the purpose of the Study as described in the Informed Consent Form and may help develop new applications, procedures, and commercial products.

For all other Personal Data (Personal Data that is not collected for a Study), we do not control the collection and use of your information collected by third parties described above in [Disclosure of Your Information](#). When possible, these organizations are under contractual obligations to use this data only for providing the services to us and to maintain this information strictly confidential. These third parties may, however, aggregate the information they collect with information from their other customers for their own purposes.

In addition, we strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or

refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

- **Disclosure of Your Information to Affiliates.** We will only share your Personal Data with our affiliates for their promotional purposes. If you wish to unsubscribe from such affiliate’s promotions, you can do so by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from them.
- **Promotional Offers from Salus IRB.** If you do not wish to have your email address used by Salus IRB to promote our own products and services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from us. This opt out does not apply to information provided to Salus IRB for the purposes of the Study.
- **Targeted Advertising.** If you do not wish to have your contact information used to deliver advertisements according to our advertisers’ target-audience preferences, you may opt-out at any time by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes.

To learn more about interest-based advertisements and your opt-out rights and options from members of the Network Advertising Initiative (“NAI”) on its website (www.networkadvertising.org) and from members of the Digital Advertising Alliance on its website (www.aboutads.info). We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt out of receiving targeted ads from members of the NAI on its website.

7. Your California Privacy Rights

Under some circumstances, California law may provide you with the right to obtain a list of third parties (if any) that we provide your Personal Data to for their own direct marketing purposes.

California Civil Code Section 1798.83 (California’s “Shine the Light” law) permits users of our Website that are California residents and who provide Personal Data in obtaining products and services for personal, family, or household use to request certain information regarding our disclosure of Personal Data to third parties for their own direct marketing purposes. If applicable, this information would include the categories of Personal Data and the names and addresses of those businesses with which we shared your Personal Data with for the immediately prior calendar year (e.g. requests made in 2021 will receive information regarding such activities in 2020). You may request this information once per calendar year. To make such a request, please send an email to privacy@salusirb.com.

8. Do Not Track Signals

We may use automated data collection technologies to track you across websites. We currently do not honor do-not-track signals that may be sent by some browsers.

We also may use automated data collection technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. At this time, we do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such a signal is broadcast or received by us.

9. Data Security

Information transmitted over the Internet is not completely secure, but we do our best to protect your Personal Data. You can help protect your Personal Data and other information by keeping your password to our Websites confidential.

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. Health and medical information you provide to us is stored on our secure servers behind firewalls and password protected.

The safety and security of your information also depends on you. Where we have given you a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Website. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

10. Changes to Our Privacy Policy

We will post any changes to our Privacy Policy on our Website. If we make material changes to our Privacy Policy, we may notify you of such changes by posting a notice on the Website’s home page.

We may change this Privacy Policy at any time. It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users’ Personal Data, we will notify you by posting a notice on the Website’s home page. The date this Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this Privacy Policy to check for any changes.

11. Contact Information

You may contact us through the contact information below.

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, you may contact us at the contact information below.

To Contact Salus IRB

RCRC Independent Review Board, LLC d/b/a Salus IRB

2111 W. Braker Lane, Suite 100

Austin, Texas 78758

512.380.1244

privacy@salusirb.com