

PRIVACY POLICY

Last updated on 2 April 2025

Welcome to ePRO's Privacy Policy.

Please note that this Privacy Policy applies to personal data that is collected and processed in the course of providing Service (as defined in Definition Section of the General Terms of Service and/ or Contract) by **Wemedoo AG**, with registered seat at Sumpfstrasse 24, 6312 Steinhausen, Switzerland, CIN: CHE-290.176.074, VAT number: CHE-290.176.074 MWST, (hereinafter: "**Wemedoo**", or "**we**").

Wemedoo, as a Data Controller or Data Processor, (collects and) processes personal data relating to interactions on the Tool (as defined in the Definition Section of the General Terms of Service and/ or Contract). This Privacy Policy describes how Wemedoo uses and protects any information that you share with us in relation to our Tool.

We believe in full transparency, which is why we keep our Privacy Policy simple and easy to understand.

We strongly urge you to read this Privacy Policy and make sure that you fully understand and agree with it. If you do not agree to this Privacy Policy, please do not access, or otherwise use ePRO. In case there is anything that you would like to ask us regarding this Privacy Policy, please send your inquiry to info@wemedoo.com.









This Privacy Policy represents a contract between you and Wemedoo.





Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Definitions Section of the General Terms of Service and/ or Contract.

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1. DEFINITIONS

TERM	MEANING
Consent 	Explicit consent on the processing of personal data, given in accordance with all applicable privacy and data protection laws and regulations regarding consent for the processing of personal data, including for the processing of data from underage users.
Cookies 	Cookies and other similar technologies (e.g. web beacons, LocalStorage, etc.) are small pieces of data stored on your device (computer or mobile device). This information is used to track your use of the Tool and to compile statistical reports on Tool activity.
Data Controller 	An entity that alone or jointly with others determines the purposes and means of the processing of personal data.
Data Processor 	Any natural or legal person who processes the data on behalf of the controller.
Data Protection Law 	a) the Switzerland Federal Act on Data Protection (Revised Act, 25 September 2020), and / or b) General Data Protection Regulation 2016/679.
Data Subject, or you 	Any natural person that shares personal data with us via Tool, or in relation to Tool (e.g. via email).
Employer 	The Client or Organization who made your Personal Data available to us and who is using the Service.
Employee 	An individual engaged by the Employer, including but not limited to employees, consultants and contractors.

Organization 	Legal entities taking part in the clinical trials supported by the Tool, such as investigational center, contract research organization, sponsor, IMP supplier.
Participant 	A natural person whose information is being processed within the Tool in relation to Client Service and participation in a clinical trial. Namely, Participants will provide their personal data via questionnaires available on the Tool. Participants can access the Tool via the User Account assigned to him/her.
Personal data or data 	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, either directly or indirectly. Therefore, data about a company or any legal entity is not considered to be personal data but registering on behalf of a legal entity may include sharing personal data. For example, information about one-person companies may constitute personal data where it allows the identification of a natural person. The rules also apply to all personal data relating to natural persons in the course of professional activity, such as the employees of a company or organization, and business e-mail addresses like "firstname.surname@company.com". This Privacy Policy does not apply to information from which no individual can reasonably be identified (anonymized information).
Processing 	Any operation or set of operations that is performed on personal data or sets of personal data. This includes activities such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

2. DATA CONTROLLER AND DATA PROCESSOR

In relation to your personal data processed via the Tool, Wemedoo may be either a Data Controller or Data Processor.

When Wemedoo acts in the capacity of a Data Controller, Wemedoo determines the purposes and means of the processing of personal data. The purpose of data processing is the reason why we process your personal data. The table in Section 3.1 of the Privacy Policy presents the purposes and legal basis for data processing. In those cases, Wemedoo is responsible for your personal data.

In relation to the usage of the ePRO Tool, Wemedoo will primarily process your data in the capacity of a Data Processor, in the manner explained in the Section 3.2. However, if Wemedoo is processing your data in the capacity of a Data Controller, should you have

any inquiries, or you wish to exercise any of the rights of a Data Subject stipulated in Section 9, please contact us:

- **Wemedoo AG**
- Sumpfstrasse 24, 6312 Steinhausen, Switzerland
- Email: info@wemedoo.com

Given that Wemedoo strongly supports fair personal data processing, despite being only a Data Processor in the below-listed cases, Wemedoo made an additional effort to explain such personal data processing via Tool - in Section 3.2 of this Privacy Policy.

The information contained therein outlines how personal data processing via ePRO functions in general. But if you wish to send an inquiry, or exercise any of the rights which you may have under the applicable Data Protection Law as the Data Subject, please contact the Client directly, as they hold the position of Data Controller.

Since Wemedoo is a company operating under the laws of Switzerland and falls under the scope of application of the Data Protection Law, Wemedoo as a Data Processor is obliged to sign the Data Protection Addendum to the General Terms of Service ("**DPA**"), with the Client as a Data Controller. The DPA reflects the agreement between the Client and Wemedoo regarding the terms which govern the processing of personal data under General Terms of Service. Signing the DPA will be considered as an amendment to the Contract (within the meaning of the Definitions Section of the General Terms of Service) and will be considered to form a part of the Contract. If you are an Employee who represents a Client or you are registered at the request of a Client that does not fall under the application of the Data Protection Law, Wemedoo processes your personal data under the DPA concluded between Wemedoo and the Client, which includes the Standard Contractual Clauses adopted by the European Commission, as applicable.

3. WHAT DATA DO WE PROCESS ABOUT YOU AND WHEN?

We may collect and receive information about you in various ways:

- Information you provide using ePRO (for example, by requesting the creation of an Account on ePRO or while filling out the questionnaires available on the Tool).
- Information you decide to provide through getting in touch with us.
- Information we collect using cookies and similar technologies as explained below.

Personal data we may collect automatically

Each time you use Tool we may automatically collect the following information:

- At the time of logging in, we store the data in local storage, such as the **user id, the hashtag** that we generate ourselves and is created at the time of logging in, the date and time of logging in and the date and time when you will be logged out automatically. Namely, we have created the functionality that every user is automatically logged out of Tool after exactly 2 hours after being logged in. This time window may be reduced if requested by the specific Client.

- when you use ePRO, we will keep a record of the details of that usage, including the date, time, location, frequency and duration of the usage;
- technical information about your computer or mobile device for system administration and analysis, including your IP address and browser information;
- other information about your use of ePRO, including the pages you have viewed and, actions you have performed on the Tool .

Please read our Cookie Policy in order to find out more about these technologies.

3.1 WEMEDOO AS DATA CONTROLLER

Wemedoo will primarily have the role of Data Processor in relation to the collection and processing of your personal data via the Tool. However, for the purpose of complete transparency, we list possible occasions in which Wemedoo can find itself in the role of Data Controller.

DATA WE COLLECT	PURPOSE	LEGAL BASIS	RETENTION PERIOD
<p>Information necessary to access the Tool</p> <p>System User Role, first name and last name, email address, phone number and Organizations and clinical trials in which User is taking part.</p> <p>Some personal data such as name and surname, date of birth, email address and phone number might be used from the existing accounts on Connected Tools, as explained in our General Terms of Service.</p>	<p>Accessing the Tool and User Account at ePRO according to the Product-specific Terms of Service.</p>	<p>Processing is necessary for the performance of the Contract (as defined in Definition Section of the General Terms of Service).</p>	<p>Until the Account is deleted in accordance with the General Terms of Service and Section 8 below.</p>

Voluntarily provided Data i.e., data you decide to share with us by contacting us.	If you send us an inquiry or otherwise request support, we will collect the data you decide to share with us.	Processing of personal data is either necessary to provide a Service or part thereof or the processing is based on your consent.	If the processing is based on your consent, we keep the information until you withdraw your consent or for one year, whichever date comes first.
Information necessary for identification	To allow Data Subjects to exercise their rights in accordance with this Privacy Policy, as defined in Section 9.	Processing is necessary for compliance with a legal obligation to which the Data Controller is subject.	We keep this information for a period of one year.
Other personal data	For the prevention and detection of fraud, money laundering or other crimes or to respond to a binding request from a public authority or court.	The processing is necessary to comply with legal and regulatory obligations.	In accordance with the applicable statutory deadlines.

3.2 WEMEDOO AS DATA PROCESSOR

As previously stated, concerning some of your personal data processed on the Tool, Wemedoo is a Data Processor, and the Client is the Data Controller. Wemedoo processes personal data following instructions from the Data Controller under the General Terms of Service, and DPA (if any). The purpose of such personal data processing includes but is not limited to: creating a User Account and Participant Account, adding system user roles within the trial to the Employee Account, adding permission to the User Account, adding Organizations and trials to the Tool, sending relevant notification in relation to the usage of the Tool, collecting answers to the questionnaires from Participants.

As a processor, Wemedoo is permitted to collect, use, disclose and/or otherwise process your personal data only in accordance with its contracts with the Client.

3.2.1 Processing prior to using the Service

a) Participant's data

The Client collects Participant personal data outside the Tool for participation in a clinical trial (which is done in various ways, e.g. from direct advertisements to which potential

Participants respond, the analysis of medical records of already existing patients, or a combination of those two approaches).

The Client, in whose trial you are taking part as a Participant, shares your following information to enable you access to the ePRO Tool:

- First and last name;
- E-mail address;
- Phone number
- Country, postal code and address line;
- Language;
- Identifier and identifier type.

Some personal data such as name and surname, date of birth, email address and phone number might be used from the existing accounts on Connected Tools, as explained in our General Terms of Service.

Your information will be available only to Clients conducting a clinical trial in which you are participating, and for which you have provided informed consent.

b) Employee's data

Your Employer shares your following information to enable you the access to the ePRO Tool:

- First and last name;
- E-mail address, System role;
- Phone number;
- Organizations and clinical trials in which you are taking part in and your roles within those trials/organizations;
- Permissions assigned to your Account.

If you have any questions regarding the legal basis for such personal data processing, please contact the Client who added you to ePRO Tool.

3.2.2 Processing during the usage of the Tool

a) Employee's data and Participant's data

If you are an Employee who decides to accept the invitation sent to your email to use ePRO, you will be able to do so by entering your email address and password on the login page.

If you are a Participant who decides to accept the invitation sent to your email address or phone number to use ePRO, you will be able to do so by entering your email address/phone number on the login page and verifying your account via a single-use code sent to your email, or an SMS message sent to your phone number.

During their first login on the Tool, the Employees will enter the automatically generated password that was sent to them via email when their account was created. Once the Employees log in for the first time, the Employees will have to change the password to the one that they want to use throughout the trial.

You manage personal data you share via your account depending on the permissions assigned to your User Account.

Admin can create accounts for the Users and designate roles and permissions to the Employees within the Tool. Admin engaged by Wemedoo can view and edit everything other than information related to Participants. Admin who is using the Tool as the Client's representative can only view and edit information related to Employees, Participants, and Client Services of that specific Client.

Moreover, the Client's Employees can add and manage personal information about the Participants of that Client.

Also, information Participants provide within the questionnaires on the Tool will be available to the Client who invited them to the Tool and the Client's Employees.

If you have any questions regarding the legal basis for such personal data processing, please contact the Client who added you to the Tool or a Company with whom you work with.

4. WHAT DO WE NOT DO?

Wemedoo will never:

- Sell any kind of personal information or data.
- Disclose this information to marketers or third parties not specified in Section 6 of the Privacy Policy.
- Process your data in any way other than stated in this Privacy Policy.

5. PERSONAL DATA SECURITY

We take administrative, technical, organizational, and other measures to ensure the appropriate level of security of personal data we process. Upon assessing whether a measure is adequate and which level of security is appropriate, we consider the nature of the personal data we are processing and the nature of the processing operations we perform, the risks to which you are exposed by our processing activities, the costs of the implementation of security measures and other relevant matters in the particular circumstances.

Some of the measures we apply include access authorization control, information classification (and handling thereof), protection of integrity and confidentiality, data backup, firewalls, data encryption and other appropriate measures. We equip our staff with the appropriate knowledge and understanding of the importance and confidentiality of your personal data security.

Whenever we save your personal information, it's stored on servers and in facilities that only selected personnel and our contractors have access to. We encrypt all data that you submit through Tool during transmission using SSL in order to prevent unauthorized parties from viewing such information. Remember – all information you submit to us by email is not secure, so please do not send sensitive information in any email to Wemedoo.

We never request that you submit sensitive or personal information over email, so please report any such requests to us by sending an email to info@wemedoo.com.

We protect personal information you provide online in connection with registering an account via ePRO Tool. Access to personal information you entered is available through a password you selected to use during the trial (as explained in Section 3.2.2 above). This password is encrypted while transmitted from your browser to our servers and while stored on our systems. To protect the security of your personal information, never share your password with anyone. Please notify us immediately if you believe your password has been compromised.

The Tool has a functionality to allow the export of data collected, analyzed, and processed through the questionnaires supported by the Tool. Since such exported files may contain personal data, ePRO has taken additional measures to secure the integrity of that data. Each exported file is password protected and may contain an electronic signature, which prevents editing of the original information that is exported from the Tool. If anything is edited in the exported documents, the electronic signature will automatically be removed, making the export invalid. Therefore, exported files can't be additionally edited outside the Tool, which makes unauthorized modifications of data impossible.




6. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?




Wemedoo utilizes external processors and sub-processors for certain processing activities. We conduct information audits to identify, categorize and record all personal data that is processed outside our company, so that the information, processing activity, processor and legal basis are all recorded, reviewed and easily accessible. The list of our sub-processors is approved by the Client.

We have strict due diligence procedures and measures in place and review, assess and background check all processors prior to forming a business relationship. We obtain company documents, certifications, references and ensure that the processor is adequate, appropriate, and effective for the task we are employing them for.

We audit their processes and activities prior to contract and during the contract period to ensure compliance with the data protection regulations and review any codes of conduct that oblige them to confirm compliance.

This is the list of processors and sub-processors with whom we share your personal data:

DATA PROCESSOR 	ROLE 	SEAT 
Cloud service providers	Providers of cloud storage services	EEA

SUB-PROCESSOR 	ROLE 	SEAT 
Wemedoo subsidiaries	Data management services	Council of Europe Member States

We may also share your personal data with our outside accountants, legal counsels, and auditors.

Moreover, we may disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- to prevent and detect fraud or crime;
- in response to a subpoena, warrant, court order, or as otherwise required by law.

Please note that personal information may be disclosed or transferred as part of, or during negotiations of, a merger, consolidation, sale of our assets, as well as equity financing, acquisition, strategic alliance or in any other situation where personal information may be transferred as one of the business assets of Wemedoo.

We do not have a list of all third parties we share your data with. However, if you would like further information about who we have shared your data with, you can request this by contacting us at info@wemedoo.com.

7. INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA

We may transfer your personal data to countries other than the one you reside in. In that case, we will also apply appropriate technical and organizational measures to ensure an adequate level of security in respect of all personal data we process. If the Data Protection Law applies to you, we make sure that such transfer is made:

1. to the countries within the EEA;
2. to the countries which ensure an adequate level of protection;
3. to the countries which do not belong to those specified under item 1. and 2, but only by applying the appropriate safeguard measures (such as Standard Contractual Clauses adopted by the European Commission).

If you would like to obtain more information about these protective measures, please contact us at info@wemedoo.com.

Your personal data is stored on servers located in EEA, India and the United States.

8. HOW LONG DO WE KEEP YOUR DATA?

The period for which we store your personal data depends on a particular purpose for the processing of personal data, as explained in detail in Section 3. We retain personal data for as long as we reasonably require it for legal or business purposes, particularly those related to clinical trials. In determining data retention periods, we take into consideration the applicable law (see the General Terms of Service), including rules and regulations on clinical trials, our contractual obligations, and the expectations and requirements of our Clients.

Furthermore, as an exception to the retention periods from Section 3, your data may be processed to determine, pursue, or defend claims and counterclaims.

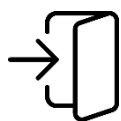
In any case, when we no longer need personal information, or when you legitimately request us to delete your information and the applicable retention rules and regulations do not prevent us from doing so, we will securely delete or destroy it.

9. YOUR RIGHTS

Given that fairness and transparency are our cornerstone principles, we wanted to remind you of the rights that you have as a Data Subject. These rights may be exercised by Data Subject when Wemedoo operates as a Data Controller.

If your inquiry or exercise of any of the Data Subject's rights relates to the data processed by the Client as a Data Controller as explained in Section 3.2 of the Privacy Policy, please contact the Client (the company whose representatives created your User/ Participant Account or requested creation of your User/ Participant Account).

In the event Wemedoo receives a request for exercising any of these rights directly from a Data Subject, we are obliged to notify the Client before responding to such a request.



Right of Access

You can send us a request for a copy of the personal data we hold about you.

We have ensured that appropriate measures have been taken to provide such in a concise, transparent, intelligible, and easily accessible form, using clear and plain language. Such information is provided in writing free of charge. It may be provided by other means when authorized by the Data Subject and with prior verification as to the subject's identity.

Information is provided to the Data Subject at the earliest convenience, but at a maximum of 30 days from the date the request was received. Where the provision of information is particularly complex or is subject to a valid delay, the period may be extended by two further months where necessary.



Right to Object to Processing

You have the right to object to the processing of your personal data where that processing is being undertaken based on the Data Controller's legitimate interest. In such a case the Data Controller is required to cease processing your data unless they can demonstrate adequate grounds that override your objection.



Right to Correction of Your Personal Data

If your personal data processed by the Data Controller is incorrect, you have the right to request that we correct that data. When notified of inaccurate data by the Data Subject, we will rectify the error within 30 days and inform any third party of the rectification if we have disclosed the personal data in question to them.



Right to Erasure

You have the right to request that your personal data is deleted in certain circumstances, such as:

- The personal data are no longer needed for the purpose for which they were collected;
- You withdraw your consent (where the processing was based on consent);
- You object to the processing and no overriding legitimate grounds are justifying processing the personal data;
- The personal data have been unlawfully processed; or
- To comply with a legal obligation.

However, this right does not apply where, for example, the processing is necessary:

- To comply with a legal obligation (such as, for example, compliance with retention periods from applicable clinical trials rules and regulations); or
- For the establishment, exercise, or defense of legal claims.

In case the User wants their User Account to be deactivated, the User should contact the Admin, who has the adequate permissions to deactivate the User Account. Please note that some data will be kept for our internal business purposes, legal, financial, and accounting purposes in accordance with the General Terms of Service.



Right to Restriction of Processing

You can exercise your right to the restriction of processing in the following situations:

- if the accuracy of the personal data is contested,
- you consider the processing unlawful, but you do not want your personal data to be erased,
- we no longer need the personal data, but you require it for the establishment, exercise or defense of legal claims or you have objected to the processing and verification.



Right to Data Portability

Where you have provided personal data to us, you have the right to receive such personal data back in a structured, commonly used and machine-readable format, and to have those data transmitted to a third-party without hindrance, but in each case only where:

- The processing is carried out by automated means; and
- The processing is based on your consent or the performance of a contract with you.



Right to Withdraw the Consent

If you have provided your consent to the collection, processing, and transfer of your personal data, you have the right to fully or partly withdraw your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there is another legal ground for the processing (such as compliance with a legal obligation, for example from rules and regulations on clinical trials).



Right to Lodge a Complaint

If you have any concerns or requests in relation to your personal data, please contact us at info@wemedoo.com and we will respond as soon as possible but not later than 30 days.

If you are unsatisfied with our response, you may also contact the competent supervisory authority at your country of residency or Federal Data Protection and Information Commissioner, Feldeggweg 1, CH - 3003 Berne, telephone number: +41 (0)58 462 43 95, e-mail: info@edoeb.admin.ch, website: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

10. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy will be posted on this page and where appropriate may be notified to you by email or advised to you on the next login to ePRO.

If you continue with the use of the Tool after the changes were implemented, that will signify that you agree to any such changes.