

T&S INNOVATIONS B.V. PRIVACY POLICY

T&S innovations b.v.
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DEFINITIONS

- **T&S innovations:** The company T&S innovations b.v.
- **DMS:** T&S innovations Data Management System.
- **Licensee:** A person or organisation that purchased a DMS license.
- **Licensee-DMS:** The (sub) DMS of the licensee.
- **User:** A user of a (licensee) DMS created by T&S innovations or the licensee.
- **eCRF:** Electronic Case Record Form. A form by which data can be collected.

INTRODUCTION

T&S innovations develops innovations. The main service T&S innovations delivers is a data management system. This is a system that can collect data by defining eCRFs of studies. A study can be a for example a catalog of a personal DVD collection or data of a clinical study. T&S innovations is mainly involved in clinical studies. Persons or organisations can purchase a license for the use of the DMS. A licensee can, independently from T&S innovations, define his/her own data management system (the licensee-DMS). Furthermore, T&S innovations develops applications, e.g. Apps for mobile devices.

T&S innovations collects personal and non-personal information to enable the use of T&S innovations services and products. **You are not required to provide this information** when T&S innovations requests such information, but, if you choose not to do so, in most cases T&S innovations will not be able to provide you with our services and/or products or respond to any queries you may have.

Personal information is data that can be used to identify one single person. **Non-Personal Information** is data that does not on its own permits to identify one single person. If non-personal information is combined with personal information, T&S innovations treats this information always as personal information for as long as it remains combined.

T&S innovations collects and stores personal and non-personal data for e.g. enable usage of our data management system (services) and the usage of applications (products).

DATA MANAGEMENT SYSTEM (DMS)

The T&S innovations data management system is **used to collect and manage data**; e.g. data of clinical studies. For this, e.g. persons, companies, societies can **purchase a licence** for using the DMS for their own data collection (licensee-DMS). The licensee can, independent from T&S innovations, design data collection



forms (eCRF's) and can invite others to e.g. enter data into the licensee's eCRF's. For a licensee-DMS the collection of personal and non-personal information is the **responsibility of the licensee**. However, T&S innovations will e.g. backup data and may have access to these data for e.g. monitoring or other reasons. This privacy policy of T&S innovations includes the latter. However, **it is the responsibility of the licensee to implement a privacy policy for their own licensee-DMS**.

APPLICATIONS (APPS)

T&S innovations develops applications for different platforms e.g. Windows, MacOS, iOS and Android. In case these applications are developed by T&S innovations innovation but are owned by an other party, that **other party is solely responsible** for the collection of personal and non-personal information and therefore also responsible for a privacy policy.

COLLECTION AND USE OF PERSONAL INFORMATION

This information can identify one single unique person. You may be asked to **provide your personal information** anytime you are e.g. in contact with T&S innovations, using the DMS and/or products or when you are involved in a licensee-DMS. Some examples of what kinds of data T&S innovations may collect and how T&S innovations uses it.

- When e.g. a person, company, society requests a license of the DMS, T&S innovations **has to collect the necessary information to create a licensee DMS**. This information includes name, mailing address, email address and DMS-username. T&S innovations will always check these data to guarantee that the data identifies the correct e.g. person, company, society. Furthermore, the licensee has to create an access password that is stored encrypted.
- When T&S innovations invites e.g. a person to enter data into the DMS, **T&S innovations has to collect information to enable the creation of a user account**. This information includes name, email address and DMS-username. The user has to create an access password that is stored encrypted. T&S innovations always checks the data to ensure that the data identifies the correct person.
- When a licensee invites e.g. a person to e.g. enter data into the licensee DMS, **the licensee has to collect certain information to enable access to the licensee DMS**. It is the solely responsibility of the licensee to ensure that this information identifies the correct person. It is the solely responsibility of the licensee to collect and use these data according to e.g. a licensee privacy policy and other regulations and laws.
- In a licensee-DMS data may be collected via e.g. eCRFs. It is possible that personal and non-personal information are collected. It is then the solely **responsibility of the licensee for a licensee DMS** to ensure that all data is collected, stored and handled according to e.g. appropriate laws, regulations and a privacy policy. For any data collected by the DMS with e.g. eCRFs by T&S innovations, T&S innovations is responsible to ensure that all data is collected, stored and handled according to e.g. appropriate laws, regulations and a privacy policy.
- For certain applications it may be necessary to collect e.g. name, username, (encrypted) password, mailing address, and email address. The owner of the application e.g. T&S innovations or an other party that legally owns the application is solely **responsible for e.g. the privacy policy**.

- T&S innovations does collect **Internet Protocol (IP) addresses**, which information we consider as personal information. For example the DMS collects IP addresses for security reasons.
- Sensible information as for example passwords are always stored encrypted. E.g. the passwords created by e.g. licensees or users are stored encrypted and e.g. T&S innovations or licensees have no access to the original non-encrypted password.

All licensees and users of the (licensee) DMS have to sign a licensee or user agreement before they can use the DMS.

COLLECTION AND USE OF NON-PERSONAL INFORMATION

T&S innovations also collects information in a form that does not, on its own, permit a direct association with an individual. In most cases, you are not obliged to provide this information when T&S innovations innovation or a licensee requests such information. The following are some examples of non-personal information that T&S innovations collects:

- Additional information such as language, zip code, area code, referrer URL, location, and the time zone. This information is collected e.g. to enable communication with users and for e.g. security reasons.
- T&S innovations does collect information regarding the **licensees and users activity in the (licensee) DMS**. This (logging) information is needed for security reasons and to enable compliance with e.g. 'Good Clinical Practice' (GCP) regulations.
- T&S innovations **may collect data about how users use our devices and applications** in order to improve services and products.
- Some services and products will make use of cookies and other technologies. Some of our services, e.g. the DMS, need cookies to be functional.

DISCLOSURE TO THIRD PARTIES

T&S innovations may disclose your personal information with third parties e.g. for mailing lists, newsletter purposes. **We will not disclose personal information with third parties for their marketing purposes.** All T&S innovations personal with access to personal information is **bound to a confidentiality agreement** stating that they cannot share this information with others. It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for T&S innovations **to disclose your personal information**. T&S innovations may for the purpose of national security, law enforcement, or other issues of public importance, disclose your information. In the event of a reorganisation, merger, or sale T&S innovations may transfer any and all personal information to the relevant third party.

PROTECTION OF PERSONAL INFORMATION

T&S innovations takes the security of your personal information very seriously. For example, our data management system is located in a **secure and fully certificated datacenter**. Furthermore, all information

transport from and to the DMS is **encrypted** by techniques as Transport Layer Security (TLS). The connection with the DMS is furthermore protected by a **security certificate** that guarantees the connection with the correct system. Any data stored at the location of T&S innovations b.v. are stored on e.g. encrypted disks. The user and licensee agreements clearly state that the **licensees and users should consider their username and password as confidential information** and they are not allowed to share this information with others. T&S innovations is not responsible for any misuse of the username/password of users and licensees. The licensee and users are responsible for the data they themselves store e.g. off-line.

INTEGRITY, RETENTION AND ACCESS TO PERSONAL INFORMATION

T&S innovations will **retain your personal information for the period necessary** to fulfil the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law or regulations. For example, for clinical studies it can be necessary to keep all data, including your personal information, accessible for a long period (e.g. 15 years). At any time you can request for corrections if the information is incorrect or to delete your personal data if T&S innovations is not required to retain it due to law or regulations. **In the DMS you can always access a page that shows all your on-line stored personal information.**

DATA BREACH - SAFETY

T&S innovations has taken many precautions to **prevent e.g. data breaches**. For example, all communication with the data management system is encrypted and protected by a security certificate. All on-line data are stored in a secure, validated and certificated data center. In the DMS we implemented a monitoring system that will inform T&S innovations immediately when any suspicious activity is detected. All data that are stored at the T&S innovations location are stored on e.g. encrypted disks. All employees and others that have access to the DMS data and personal information are bound to a confidentiality agreement. However, T&S innovations cannot guarantee for the full 100% that data breaches do not occur. In case T&S innovations detects a data breach this will **be reported to the privacy authorities** within 72 hours after detection, when possible. Furthermore, when possible, **all persons/organisations involved will receive a notification.**

COOKIES

T&S innovations b.v. uses cookies to be able to provide all the functionality of the data management system. By using the data management system you consent to the use of cookies.

What are cookies?

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the website or a third-party to recognise you and make your next visit easier and the access more useful to you. Cookies can be "persistent" or "session" cookies.

How T&S innovations b.v. uses cookies.

When you use and access the data management system, we may place a number of cookies files in your web browser. We use cookies for the following purposes. To enable certain functions of the data management system, to monitor it, to provide analytics or to store your preferences. We do **NOT** use cookies for e.g. enabling advertisements delivery, including behavioural advertising or to retrieve personal information. E.g. we do **NOT** use cookies to authenticate users. We may use various third-parties cookies to report statistics of the Service, and so on. We may use both session and persistent cookies and we may use different types of cookies.

What are your choices regarding cookies?

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. Please note, however, that if you refuse to accept them, you might not be able to use all (or any) of the features we offer and some of our pages might not display properly.

Where can you find more information about cookies?

You can learn more about cookies e.g. at the following third-party website:

AllAboutCookies: <http://www.allaboutcookies.org>

PRIVACY QUESTIONS

If you have any questions, complaints or concerns regarding your privacy and our privacy policy please contact T&S innovations.

T&S innovations b.v.
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