

# Consequent Solutions Website Privacy Policy

Last updated: October 3, 2023

Consequent Solutions is committed to protecting the privacy of our customers. Consequent Solutions believes that healthcare and clinical research should be borderless and patient-centric and is committed to creating a seamless bridge between patients, healthcare providers, and researchers.

Our Privacy Policy is designed to help you understand how we collect and use personally identifiable information (“Personal Information”) that you provide us and to help you make informed decisions when using our website and services (collectively, “Consequent Solutions”, Company, or “Website”).

This privacy policy applies to all information collected through our website, mobile application (Apps) and use of our SaaS product(s).

By visiting or using any part of this website, you agree to the terms of this Privacy Policy as they may be amended from time to time. As we update our website over time, this Privacy Policy may change, so please check for updates.

Read the [United States Regional Privacy Notice](#) for more details about how we handle Personal Information and how to exercise your rights.

## Scope of This Privacy Policy

This Privacy Policy applies to Personal Information and other information collected by Consequent Solutions or its service providers from or about:

- Visitors to, or users of, its websites
- Prospective and current customers using Consequent Solutions services
- Service providers and business partners
- Prospective and current employees
- Other third-parties that it interacts with

We collect this information to continually improve and enhance the functionality of Consequent Solutions. We gather certain information automatically. This information may include IP addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We link this automatically collected data to other information we collect about you.

## What Is Personal Information?

“**Personal Information**” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or

more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal Information may include the following: name, address, date of birth, gender, and contact data (i.e., email address, telephone number, and employer name).

We may also collect information that is related to you but that does not personally identify you (“**Non-personal Information**”). Non-personal Information also includes information that could personally identify you in its original form, but that we have modified (for instance, by aggregating, anonymizing or de-identifying such information) in order to remove or hide any Personal Information.

## **Collection of Personal Information**

We take your privacy seriously and employ information protection controls in keeping with industry standards and practices to safeguard your information and protect your anonymity. Personal Information about you may be collected from you through various sources, including information i) that is entered manually and voluntarily by you on the site’s application and other forms or postings on the site; ii) that you provide regarding your preferences (for example, based on your activity on our website); iii) from other sources with your consent (for example, from other institutions such as auditors or administrators); iv) from sources in the public domain; and v) from other interactions you may have with us (for example, discussions or emails with our staff, including through the use of the site’s contact features).

In addition, when you visit our website(s) and our related services, we may gather anonymous technical and navigational information, such as computer browser type, Internet protocol address, cookie information, pages visited, and average time spent on our website. This information does not personally identify you and may be used, for example, to alert you to software compatibility issues, to customize any advertising or content you see, fulfill your requests for products and services, contact you, conduct research or analyze and improve our site design and functionality.

Such information collected by us may be stored and processed in the United States or any other country in which our agents or we maintain facilities. By using the website and our services, you consent to the foregoing collection and use of information and any such transfer of information outside of your country. We make no representation or warranty with respect to any duty to permanently store any Personal Information you may provide.

## **Personal information you choose to provide**

In order to provide the best experience when you visit our website, we may ask you for Personal Information. Personal Information includes, for example, your name and e-mail address, both of which you may be asked to provide when registering with Consequent Solutions. A description of some of the ways that you may provide Personal Information to us, as well as further details on how we may use such Personal Information, is given below.

### **Contact us/feedback**

If you email us using a "Contact us" link on our website, we may ask you for information such as your name and e-mail address so we can respond to your questions and comments. If you choose to correspond with us via e-mail, we may retain the content of your e-mail messages, your e-mail address and our response to you.

## **Surveys**

We may occasionally ask website visitors to complete online surveys and opinion polls about their activities, attitudes, and interests. These surveys help us improve our products and services. When asking for participation in these surveys, we may ask you to provide us with your name and email address.

## **Website Forms**

Our website may offer visitors contact forms to request additional details and to download collateral. If you fill out one of our web forms, we may ask you for information such as your name and email address so we can respond to your questions and comments. If you choose to correspond with us via web forms, we may retain the form data which can include name, email address and other contact related details.

## **Website usage information**

### **Cookies**

When visiting Consequent Solutions, we may use cookies on or in connection with our website to maintain information about you. A cookie is a very small text document, which often includes an anonymous unique identifier and additional information necessary to support the site's intended functionality. Consequent Solutions uses session cookies. A session cookie is temporary and disappears after you close your browser.

Technologies such as: cookies, beacons, tags, and scripts are used by Consequent Solutions and our marketing partners, analytics providers, and customer support systems. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our userbase as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies for marketing and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

To learn more and for a detailed cookie notice, the user may consult the [Cookie Policy](#) .

Most web browsers can be set to tell you when a cookie has been sent to you and give you the opportunity to refuse that cookie.

Refusing a cookie may in some cases prevent you from using or negatively impact the display or function of our website or certain areas or features of our website. There are numerous resources on the Internet that can provide more information about how cookies work and how you can manage them.

### **Web beacons**

Web Beacons, also known as pixel tags and clear GIFs, ("Web Beacons"), are electronic images that allow a website to access cookies and help track marketing campaigns and general usage patterns of visitors to those websites. Web Beacons can recognize certain types of information, such as cookie numbers, time and date of a page view, and a description of the page where the Web Beacons is placed. No personally identifiable information about you is shared with third parties through the use of Web Beacons on the site. However, through Web Beacons, we may collect general information that will not personally identify

you, such as: Internet browser, operating system, IP address, date of visit, time of visit and path taken through the site.

**Internal use of Web Beacons:** Consequent Solutions may use Web Beacons internally to count visitors and recognize visitors through cookies. Access to cookies helps personalize your experience when you visit the Site.

**Email:** Consequent Solutions may include Web Beacons in HTML-formatted email messages that Consequent Solutions sends to you. Web Beacons in email messages help determine your interest in and the effectiveness of such emails.

**External use of Web Beacons:** Consequent Solutions may also use Web Beacons externally. For example, Consequent Solutions may report aggregate information about visitors, such as demographic and usage information, to its affiliates and other third parties. Consequent Solutions may also include other Web Beacons within the site.

## **Your opt in/opt out choices**

You may “opt in” and/or “opt out” of certain uses of your Personal Information. For example, you may have the opportunity to choose whether you would like to receive email correspondence from us. Your Personal Information will not be shared with third-party service providers unless you give consent. You will have the opportunity to opt out of Consequent Solutions marketing emails by clicking the "opt out" or “unsubscribe” link in the email you receive. Requests can also be sent to [privacy@consequentsolutions.com](mailto:privacy@consequentsolutions.com).

Please take note that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions, and communications with us.

## **Permitted Use of Personal Information**

Consequent Solutions uses your Personal Information to provide you products and services, such as to fulfill your requests for products or to help us personalize our offerings to you. We also use your Personal Information to support our business functions, such as fraud prevention, marketing, and legal functions. To do this, we combine Personal and non-Personal Information, collected online and offline, including information from third-party sources.

- **Fulfill Requests:** To fulfill your requests for products and services and communicate with you about those requests.
- **Understand Customer Behavior:** To better understand customer behavior so that we may improve our marketing and advertising efforts and to improve the distribution of our products and services.
- **Personalize Offerings:** To help us personalize our service offerings, websites and services
- **Protection:** To protect the security and integrity of our websites, mobile services, and our business.
- **Legal:** To comply with legal and/or regulatory requirements.
- **Responding to Customer:** To respond to reviews, comments, or other feedback you provide us.

- **Employment Applications:** In connection with a job application or inquiry, you may provide us with data about yourself, including your educational background or resume and other information, including your ethnicity where required or permitted by law. We may use this information throughout Consequent Solutions, its subsidiaries and affiliates, and its joint ventures for the purpose of employment consideration.
- **Promotional Messaging or Advertising:** With your consent, Consequent Solutions uses your contact information to recommend products and services that might be of interest to you, to send you marketing and advertising messages such as newsletters, announcements, or special offers or to notify you about our upcoming events. If at any time, you would like to discontinue receiving any such email updates, you may unsubscribe by following the unsubscribe instructions included in each promotional email.

## Disclosure of Personal Information

Consequent Solutions does not sell or otherwise disclose the Personal Information it holds to third parties, except for the following exceptional circumstances:

- **Third Parties:** Consequent Solutions will not rent or sell your Personal Information to others but may disclose Personal Information with third-party vendors and service providers that work with Consequent Solutions. We will only share Personal Information to these vendors and service providers to help us provide a product or service to you at your request and in accordance with our respective agreement. We will ensure appropriate contractual clauses are in place to ensure compliance with data protection legislation.
- **Business Purposes:** In a prospective business transaction, Consequent Solutions may disclose Personal Information where Consequent Solutions has entered into an agreement that restricts the use and disclosure of that data solely for purposes related to the transaction, protects the data by security safeguards appropriate to the sensitivity of the information, and if the transaction does not proceed, the data is returned to Consequent Solutions or destroyed within a reasonable time. With respect to employee data, Consequent Solutions may disclose Personal Information if it is necessary to establish, manage or terminate an employment relationship, as allowed by law.
- **Legal and Safety Reasons:** Consequent Solutions may be required to disclose Personal Information to law enforcement agencies, government agencies, or legal entities. We may disclose information by law, litigation, or as a matter of national security to comply with a valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law. We may also need to disclose Personal Information in the event of an emergency that threatens an individual's life, health, or security. If the data requested is held on behalf of a customer, Consequent Solutions will consult the customer unless it is prohibited to do so by law. Consequent Solutions may be required to disclose information without your consent or knowledge if: (i) it is reasonable to expect that disclosure with your knowledge or consent would compromise an investigation of a breach of an agreement or a contravention of the law; (ii) it is reasonable for the purposes of preventing, detecting or suppressing fraud and it is reasonable to expect that the disclosure with your knowledge or consent would compromise the ability to prevent, detect or suppress the fraud; (iii) it is necessary to identify an individual who is injured, ill or deceased to a government institution or the individual's next of kin or authorized representative and, if the individual is alive, with notification to the individual.

- **Via Links to Third-Party Websites, Services, and Applications:** Using our website or services may link to third party web websites, services, and applications. Consequent Solutions is not responsible for any Personal Information collected through these means. Information collected is governed through the third party's website's privacy policy. Any interactions you have with these web websites, services, or applications are beyond the control of Consequent Solutions.

## **Use, disclosure, and sharing of Personal Information**

### **Vendors, Consultants, and Other Third-Party Service Providers.**

We may share your data with third-party vendors, service providers, contractors, or agents ("third parties") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services
- Data Analytics Services
- Data Storage Service Providers
- Payment Processors
- Website Hosting Service Providers
- Performance Monitoring Tools

We also may need to share your personal information in the following situations:

**Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

### **Compelled disclosures**

Consequent Solutions may be required to disclose collected information in order to (i) respond to investigations, court orders or legal process, (ii) to investigate, prevent or take action regarding illegal activities, suspected fraud, potential threats to the physical safety of any person, (iii) violations of the company's terms of service, or (iv) as otherwise required by law.

### **Your ability to access, limit use and disclosure**

You may request access to your personal data to update, correct or delete, or to limit the use or disclosure of, your personal data.

Individuals wishing to view, update, delete, or supplement their personal data may do so by contacting the business that provided Consequent Solutions your personal data directly to make your requests, or alternatively you can submit your request to [privacy@consequentsolutions.com](mailto:privacy@consequentsolutions.com).

### **Right to Correct Personal Information**

Your Right to Correction. You have the right to request the correction of any inaccurate personal information that we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information. We will use commercially reasonable efforts to correct the inaccurate personal information as you may direct.

## **Security**

To help protect the privacy of data and personally identifiable information you transmit through use of this site and any other related services, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

## **Data Retention and Storage**

All Personal Information is retained only for as long as it is necessary for the purposes for which it was collected or transferred. Consequent Solutions retains your information for business purposes, for as long as your account is active, and/or as long as is reasonably necessary to provide you with our products and services. Consequent Solutions will also retain your information as reasonably necessary to comply with our legal obligations, resolve disputes and enforce our agreements. We may also retain cached or archived copies of your information for a reasonable period of time. At any point in time, you can withdraw your consent and we will immediately stop processing your data.

## **Transfers of Personal Data**

The Services are hosted and operated in the United States ("U.S.") through and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided in the U.S. and will be hosted on U.S. servers, and you authorize Consequent Solutions to transfer, store and process your information to and in the U.S., and possibly other countries. We take steps to ensure that your personal data receives the same level of protection as if it remained within the EU, including by entering into data transfer agreements using the European Commission approved Standard Contractual Clauses.

## **Company Response to a Data Request and/or Security Breach**

In regard to the aforementioned rights to voice questions, make requests regarding your data privacy or withdraw consent, we will respond to your request within 30 days. In some cases, however, we may limit or deny your request if: the law permits or requires us to do so, if it infringes on the privacy of other individuals or internal procedures, if we find the request to be unfounded or excessive or if we are unable to verify your identity.

If the volume or complexity of the request requires internally processing at Consequent Solutions beyond 30 days, Consequent Solutions will inform the requester within 30 days of the reasons for an extension and may charge a reasonable fee to cover administrative costs.

Security of all information is of the utmost importance for Consequent Solutions. Consequent Solutions uses technical and physical safeguards to protect the security of your Personal Information from unauthorized disclosure. We use encryption technology to keep all information secure. We also make all attempts to ensure that only necessary people and third parties have access to Personal Information. Nevertheless, such security measures cannot prevent all loss, misuse, or alteration of Personal Information and, unless otherwise agreed in a written agreement between Consequent Solutions and the applicable party, we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. In the case of a data breach, we will notify you without undue delay of any loss, misuse or alteration of Personal Information that may affect you. We will notify relevant regulatory bodies within 72 hours of a breach.

## **Your Online Privacy Responsibilities**

By using this site, you agree to take basic steps to ensure your privacy online. You agree to log out of this site when you are finished, protecting your information from other users. You also agree not to share your password or login ID with anyone else. In addition, you agree to take reasonable precautions against malware and viruses by installing anti-virus software to protect your online activities.

## **COPPA (Children Online Privacy Protection Act)**

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online. We do not specifically market to children under 13.

## **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

- We will notify the users via email Within 7 business days
- We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

## **CAN-SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

To be in accordance with CAN-SPAM we agree to the following:



If at any time you would like to unsubscribe from receiving future emails, you can email us at [privacy@consequentsolutions.com](mailto:privacy@consequentsolutions.com) and we will promptly remove you from ALL correspondence.

## **Third Parties who may receive personal data (Onward Transfer)**

Consequent Solutions may employ and contract with third-party service providers and other entities to assist in providing our services to customers by performing certain tasks on our behalf. These third-party providers may offer customer support, data storage services (data centers), or technical operations. Consequent Solutions maintains contracts with these third parties restricting their access, use and disclosure of personal data in compliance. These third parties may access, process, or store personal data in the course of providing their services. Unless we tell you differently, our Agents do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents. We may be liable for the appropriate onward transfer of UK, EU, and Swiss personal data to third parties.

## **Your Right to Access Your Data**

We acknowledge the right of UK, EU, and Swiss individuals to access their personal data. Your ability to access, limit use and disclosure, for specific instructions on how you can access this right.

## **Your Ability to Choose How Your Data Is To Be Used**

UK, EU, and Swiss individuals may “opt in” and/or “opt out” of certain uses of your Personal Information. For details on how you can exercise your choices please refer to the “Your opt/in opt/out choices” section of this privacy policy.

## **If you are located in Canada, this section applies to you.**

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of laws.
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records

- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

## Do Not Track

Consequent Solutions does not track its customers over time and across third-party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. Third parties that have content embedded on Consequent Solutions's websites such as a social feature may set cookies on a user's browser and/or obtain information about the fact that a web browser visited a specific Consequent Solutions website from a certain IP address. Third parties cannot collect any other personal information from Consequent Solutions's websites unless you provide it to them directly.

## Important Notice to European Union Individuals: The General Data Protection Regulation

To facilitate our business practices, your Personal Data may be collected, transferred to, and stored by us in the United States. As a result, your Personal Data may be processed outside the EEA, and in countries which are not subject to an adequacy decision by the European Commission, and which may not provide for the same level of data protection in the EEA. In this event, we will ensure an adequate level of protection, for example by entering into standard contractual clauses for the transfer of data as approved by the European Commission (Art. 46 GDPR), or we will ask you for your prior consent to such international data transfers.

### GDPR Complaints

Consequent Solutions commits to resolve complaints about your privacy and our collection or use of your personal information under GDPR. European Union individuals with inquiries or complaints should be sent to [privacy@consequentsolutions.com](mailto:privacy@consequentsolutions.com) for complaints about your privacy and our collection or use of your personal information.

#### Alternative means of contact:

Consequent Solutions  
251 Little Falls Dr.  
Wilmington, DE 19808

If you have any unresolved privacy concerns that we have not addressed satisfactorily after contacting us, you have the right to contact the EU Data Protection Authorities by clicking on the following link: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## Terms of use

This Privacy Policy is governed by the Terms of Use, which includes all disclaimers of warranties and limitation of liabilities. All capitalized terms not defined in this Privacy Policy will have the meaning set forth in the Terms of Use.

To review other applicable terms and conditions that apply to this Privacy Policy, including, without limitation, intellectual property rights, representations and warranties, disclaimer of warranties, limitation of liability and resolving disputes, please review the Terms of Use.

## **Contact us**

If you have any questions or comments about this Privacy Policy, or if you would like to review, delete, or update information we have about you or your preferences, requests can be sent to [privacy@consequentsolutions.com](mailto:privacy@consequentsolutions.com) or to:

Consequent Solutions  
251 Little Falls Dr.  
Wilmington, DE 19808

## **Updates to our privacy statement**

We may need to change, modify and/or update this Privacy Policy from time to time and we reserve the right to do so without prior notice and at any time. If we do make changes in the way personal information is used or managed, any updates will be posted here, so you should also revisit this Privacy Policy periodically. Your continued use of the Site and any Services following the posting of any such changes shall automatically be deemed your acceptance of all changes.