

DATA PRIVACY NOTICE

Updated 8-6-2023

MEDCOMPLI knows you care about how your information is used and shared. We appreciate your trust and promise to use your information carefully and sensibly. The following notice describes our privacy policies and practices. This Privacy Policy applies to www.MedCompli.com, owned and operated by MedCompli, Inc. (“**MedCompli**”, “**We**”, “**Us**” or “**Our**”).

MedCompli will require its Agents to safeguard personal information consistent with this Policy by obligating the agent to provide at least the same level of protection.

MedCompli enters into Data Processing Agreements, and We use standard contractual clauses for the transfer of data as approved by the European Commission.

MedCompli may be required to disclose personal information in response to lawful requests by public authorities. MedCompli has liability for onward transfers to third parties unless We can prove We were not a party to the events giving rise to the damages. Additionally, an individual may be allowed to invoke binding arbitration to resolve disputes under certain limited conditions.

This Privacy Policy describes how MEDCOMPLI collects, uses, shares and secures the Personal Information (defined below) you provide. This Privacy Policy applies to data collected by MEDCOMPLI through the www.medcompli.com Web site, and Our software services delivered via the MedCompli Compliance Hub solution as well as our Professional Advisory services. It also describes the choices available to you regarding the use of, your access to, and how to update and correct your Personal Information. By voluntarily using a MedCompli Site and/or providing data or other information by or through a MedCompli Site, you (on behalf of yourself and/or the legal entity that you represent) are indicating your consent to this Privacy Policy and agree, on behalf of yourself and/or the legal entity that you represent) to be bound by its terms.

1. USE OF THE MEDCOMPLI COMPLIANCE HUB BY OUR CUSTOMERS

Our customers use the MedCompli Compliance Hub and Advisory services to facilitate compliance with global laws, regulations and codes of conduct as well as enhance their business functions. In the case of individuals using the MedCompli products or services, MedCompli collects information under the direction of Our customers acting on their behalf and has no direct relationship with the individuals whose personal information it processes. Our customers control and are responsible for correcting, deleting or updating information they have collected from you which is stored within the MedCompli Compliance Hub solution. MedCompli works with its customers to help them provide notice to their

customers and end users concerning the purposes for which personal information is collected. The use of personal information collected through the MedCompli products and services is limited to the purpose of providing the products or service for which Our customers have engaged MedCompli. If you are a customer or business partner of one of our customers and would no longer like your personal information processed or stored within the MedCompli products or services, please contact the customer that you interact with directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by service agreements with our customers.

Notice to End Users

Many of our products are intended for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies.

Administrators are able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access information in and about your account;
- access or retain information stored as part of your account;
- install or uninstall third-party integrations
- restrict, suspend or terminate your account access;
- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify or delete information

2. INFORMATION WE MAY COLLECT

Personal Information refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information about yourself that is processed and stored via our software services by our customers. Personal Information also includes

navigational information where such information can directly or indirectly identify an individual. Navigational information refers to information about your computer and your visits to a MedCompli Site such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed. You can visit a MedCompli Site without telling us who you are and without revealing any Personal Information about yourself. There are times, however, when We may need certain Personal Information from you. You may choose to provide us with Personal Information (such as your name, email address, phone number, company name) through a MedCompli Site when you elect to register with MedCompli in order to access our products or services. When you provide Personal Information in order to register with MedCompli, such Personal Information will be used in order to provide you with access to the requested products, services content and/or information. We may also use the Personal Information to help us understand who is using our products and services and to help us manage business development activities. MedCompli may also use Personal Information for marketing purposes. For example, MedCompli may use information you provide to contact you to further discuss your interest in our products or services and to send you information regarding MedCompli and its partners, such as information about promotions or events. If you tell us that you do not want us to use this Personal Information as a basis for further contact with you, We will respect your wishes. Please contact us at info@medcompli.com.

3. SHARING OF INFORMATION.

MedCompli is not in the business of selling your personal information. We consider this information to be a vital part of Our relationship with you. There are, however, certain circumstances in which We may share your personal information with certain third parties, as set forth below:

- **Agents, Consultants and Related Third Parties:** MedCompli, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and processing payments. When We employ another company to perform a function of this nature, We only provide it with the information that it needs to perform its specific function.
- **Legal Notice:** In certain situations, MedCompli may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, when We believe in good faith that disclosure is necessary to protect Our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. If MedCompli is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or by way a prominent notice on our website, of any change in ownership, uses of your personal information,

and choices you may have regarding your personal information. We may also disclose your personal information to any other third party with your prior consent.

4. HOW WE USE THE INFORMATION PROVIDED

We use the information We collect only in compliance with this Privacy Policy. In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information in the following ways.

Newsletters

If you wish to subscribe to our educational resources, we will use your name and email address to send the resource to you. Out of respect for your privacy, we provide you with a way to unsubscribe. Please see the “Choice/Opt-out” section of this Privacy Policy.

Cookies

MedCompli and our online marketing partners (including certain advertising and sales generation service providers) use technologies such as cookies or similar technologies to analyze trends, administer the website, track users’ movements around the website, and to gather demographic information about our user-base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis. We use cookies to remember users’ settings (e.g. language preference), for authentication on the MedCompli products and to provide relevant information on our public websites. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

Passive Collection

As is true of most websites, We gather certain information automatically and store it in log files. This information may include Internet protocol (“IP”) addresses, browser type, internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this passively collected log information with other information We collect about you. We do this to improve services We offer you (including the product experience), and to improve marketing, analytics, and site functionality.

IP Addresses

When you visit a MedCompli Site, MedCompli collects your IP addresses to track and aggregate non-personal information. For example, MedCompli uses IP addresses to monitor the regions from which customers and visitors navigate to a MedCompli Site. MedCompli also collects IP addresses from customers when they log into the MedCompli’s Compliance products as part of MedCompli’s security features.

Links to Other Web Sites

A MedCompli Site may contain links to other web sites. MedCompli is not responsible for the privacy practices or the content of such third-party web sites. The links from a MedCompli Site do not imply that MedCompli endorses or has reviewed the third-party web sites. We suggest contacting the operators of those web sites directly for information regarding their privacy policies.

MedCompli Compliance Hub Registration

If you choose to invite others within your organization to register for access to a MedCompli product or a MedCompli Site, We will ask you for the other user's name and email address. We will automatically send the user a one-time email inviting them to visit a MedCompli Site. MedCompli stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Invited users may contact us at info@medcompl.com to request that We remove this contact information from our database.

Adding a Participant to Register to a Webinar

If you choose to add a participant to register to a webinar, We will ask you for that person's name, email, company name and job title. We will automatically send him/her a one-time email inviting him/her to register. MedCompli stores this information for the sole purpose of sending this one-time email and tracking success of the registration. Invited users may contact us at info@medcompl.com to request that We remove this contact information from our database.

Customer Testimonials

MedCompli may post customer testimonials on a MedCompli Site, which may contain Personal Information. We obtain our customers' consent prior to posting their testimonials. If you wish to update or delete your testimonial, contact us at info@medcompl.com.

Security

Personal information collected through a MedCompli Site is kept in a secure database and all reasonable precautions are taken to secure this personal information. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to, or from a MedCompli Site may not be secure. Therefore, you should take special care in deciding what information you send to MedCompli via email. Please keep this security limitation in mind when disclosing any personal information to MedCompli via the Internet. The security of your personal information is important to us. When you enter sensitive information on our registration pages or order forms, We follow generally accepted standards to protect the personal information submitted to us, both during transmission and

once it is received. If you have any questions about the security of your personal information, you can contact us at info@medcompli.com.

Service Providers and Onward Transfer

MedCompli may transfer personal information that we collect under the direction of our customers to companies that help us provide our service. Transfers to these third parties are covered by the provisions in this Privacy Policy and in the service agreements We have with our customers. If we did transfer information to third party, they are required to have a privacy policy and security standards in place that are at least as protective of your information as is this Privacy Policy.

Customer Data

MedCompli customers and its end users may electronically submit data or information to the MedCompli Compliance products or Consulting services for hosting and processing purposes (“Customer Data”). MedCompli will not review, share, distribute, or reference any such Customer Data except as provided in the MedCompli Subscription Agreement, including related schedules and appendices, or as may be required by law. In accordance with the MedCompli Subscription Agreement, MedCompli may access Customer Data only for the purpose of providing the MedCompli services, preventing or addressing service or technical problems, at a MedCompli customer’s request in connection with customer support matters, or as may be required by law.

Schedule Notices and Alert Emails; Choice/Opt-out

Based on written selections you make once you initiate use of the MedCompli Compliance Hub solution or our Advisory services, you may receive schedule email notices generated by the MedCompli Compliance Hub (such as dashboards, reports or key performance indicators) or related to solution operations (e.g. including maintenance announcements) and special alert email communications describing system updates and status. If you no longer wish to receive our emails, newsletters or other communications (including scheduled solution notifications or special alert emails), you may unsubscribe at any time by using the unsubscribe link located at the bottom of such communication or by sending us an email at info@medcompli.com.

Retention of Personal Information

How long We keep information We collect about you depends on the type of information. as described in further detail below. After such time, We will either delete or anonymize your information or, if this is not possible, then We will securely store your information and isolate it from any further use until deletion is possible. We retain Personal Information that you provide to us where We have an ongoing legitimate business need to do so (for example, as long as it is required in order to contact you about the MedCompli Compliance products, or as needed to comply with our legal obligations, resolve disputes and enforce

our agreements). When We have no ongoing legitimate business need to process your Personal Information, We securely delete the information or anonymize it or, if this is not possible, then We will securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request, as described in “To Unsubscribe from Our Communications” below. If you have elected to receive marketing communications from us, We retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as when you last opened an email from us or ceased using your MedCompli Site account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

Legal bases for processing. If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services under the performance of contract;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

Information MedCompli Does Not Collect

MedCompli does not intentionally collect sensitive personal information, such as social security numbers, genetic data, health information, or religious information. Although MedCompli does not request or intentionally collect any sensitive personal information, we realize that users might store this kind of information in an instance of MedCompli. If you store any sensitive personal information on MedCompli servers, you are consenting to our storage of that information on our servers.

5. INTERNATIONAL DATA TRANSFER.

A. *Transfer of Information.* Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. We have offices in Florida, in the United States and we access personal information from our office when required in order to provide you with the Service. If you are located outside the United States

and choose to provide information to us, please note that we transfer the information, including Personal Information, to the United States and process it there. By voluntarily providing us with your personal information and your consent to the Privacy Policy, you are consenting to our use of information and your agreement to transfer information in accordance with our Privacy Policy and U.S. law.

6. HOW TO ACCESS AND CONTROL YOUR PERSONAL INFORMATION

You have the following data protection rights:

- You can request access, correction, updates or deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information.
- To exercise any of these rights, please contact us at info@medcompli.com. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

Children

The Services are not intended for use by anyone under the age of 13, nor does MedCompli knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not provide any personal data, even if prompted by the Services to do so. In the event that we confirm that we have collected personal information from someone under the age of 13 without verification of parental consent, we will delete that information promptly. If you are a parent or legal guardian of a child under 13 and believe that we might have any information from or about such child, please contact us at the email or mailing address provided at the end of this Privacy Policy.

Choice

If you are a customer or other third party that interacts with one of our customers using the MedCompli Compliance Hub solutions and/or MedCompli Advisory Services and would no longer like to have your Personal Information used by MedCompli or the Customer, please contact that Customer directly. If you seek access to Personal Information, or seek to correct, amend, or delete inaccurate Personal Information or other data, collected by MedCompli under the direction of our customers, please direct your query to the customer (e.g. the entity who is the data controller). If the customer requests MedCompli to remove the personal information or other data, We will respond to the customer request within 30 days.

Changes to Our Policy

We may change our business and any MedCompli Site from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. MedCompli reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. If We make material changes to this Privacy Policy, We will notify you here, by email, or by means of a notice on our home page prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices, and especially before you provide MedCompli with any personal information. This Privacy Policy was last updated on the date indicated at the top of this Privacy Policy. Your continued use of a MedCompli Site after any changes or revisions to this Privacy Policy have been published shall indicate your agreement with the terms of such revised Privacy Policy.

California Privacy Rights

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by MedCompli to its affiliates and/or third parties for their direct marketing purposes. To make such a request, please send an email with your first name, last name, mailing address, email address, and telephone number to MedCompli at info@medcompli.com Please include “California Privacy Rights” in the subject line of your email.

CONTACT US WITH QUESTIONS

MedCompli Privacy Officer

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