

Privacy Policy

Our commitment to your privacy

Adelphi Group of Companies – who are we?

How we use your information?

- People who have contacted us with a request for information

- If you are employed by us or apply for employment?

- Commercial and marketing communications

- People who participate in our market research or health outcomes research projects

- People who use our 3rd Party Websites

- If you use our website

How long do we keep your personal data for?

Who do we share your information with?

How we protect your information?

Your rights

How can you access your information?

Changes to this privacy policy

How to contact us?

EU-U.S. Privacy Shield: Consumer Privacy Policy

Privacy Policy

Our commitment to your privacy

ADELPHI is committed to protecting and respecting your privacy. We take our responsibilities regarding the security of information that we have collected seriously. This privacy policy sets out how we use and protect the information that you provide to us. Please read this policy carefully. If you have any questions please contact compliance.team@adelphigroup.com.

In this policy **ADELPHI, we, and us** means the Adelphi Group of Companies listed in the section Adelphi Group of Companies.

Adelphi Group of Companies – who are we?

This privacy policy is applicable for the following Adelphi Companies listed.

| | |
|--|---|
|  | <p>Adelphi Group Ltd Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 1975338</p> |
|  ADELPHI REAL WORLD | <p>Adelphi Real World Adelphi Group Ltd trading as Adelphi Real World Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 1975338</p> |
|  ADELPHI RESEARCH | <p>Adelphi Research Adelphi International Research Ltd trading as Adelphi Research Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2419446</p> |
|  ADELPHI RESEARCH | <p>Adelphi Research Adelphi Research by Design LLC trading as Adelphi Research 2005 S. Easton Road, Suite 300, Doylestown, PA 18901.</p> |
|  ADELPHI RESEARCH UK | <p>Adelphi Research UK Adelphi International Research Ltd trading as Adelphi Research UK Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB Company No: 2419446</p> |
|  ADELPHI VALUES | <p>Adelphi Values Ltd Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2761308</p> |
|  | <p>THE PLANNING SHOP International, Ltd. CP House, 97-107 Uxbridge Road, London W5 5TL. Company No: 3037899</p> |

| | |
|---|--|
|  | <p>THE PLANNING SHOP International, Inc. 2005 South Easton Road, Suite 300, Doylestown, PA, 18901.</p> |
|  | <p>Adelphi Communications Ltd Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2761321</p> |
|  | <p>Adelphi Communications LLC 437 Madison Avenue 20th Floor, New York NY, 10022</p> |
|  | <p>2TheNth Ltd Adelphi Mill, Grimshaw Lane, Bollington, Cheshire, SK10 5JB. Company No: 2072694</p> |

How we use your information?

People who have contacted us with a request for information

If you have requested information from **ADELPHI**, we will collect and process the personal data that you provide in order to respond to your request. Unless you consent to the contrary, we shall only use your personal data to provide the information you have requested.

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession

We will process your personal information where there is a legitimate interest in us doing so, if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). For example, if you are requesting information about a company or a service from a member of the Adelphi Group of Companies (see section Adelphi Group of Companies), then we may pass your personal data onto another member of the group in order to enable them to appropriately respond to your request. Again unless you consent to the contrary, that member shall only use your personal data to provide the information you have requested.

If you are employed by us or apply for employment?

If you apply to work at **ADELPHI**, we will only use the information you supply to us to process your application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference, we will not do so without informing you beforehand unless the disclosure is required by law.

Personal information about unsuccessful candidates, including the results of any assessments, may be held for 6 months after the recruitment exercise has been completed, if we feel there maybe future suitable vacancies and we want to keep your details longer we will ask your permission. It will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

For some vacancies we may advertise through a recruitment agency. The recruitment agency will collect the application information and might ask you to complete a work preference questionnaire which is used to assess your suitability for the role you have applied for, the results of which are assessed by recruiters. Please read the recruitment agencies privacy policy for further information about the data that they collect and what it is used for.

Once you have taken up employment with **ADELPHI**, we will compile a file (in both electronic and paper formats) relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment.

We will ask you to provide us with certain personal data. We may collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout any period of you working for us.

This data will include your personal contact details (such as name, title, addresses, telephone numbers, and personal email addresses), your date of birth, gender, marital status and dependants, next of kin and emergency contact information, national insurance number, bank account details, payroll records, tax status information, salary, annual leave, pension and benefits information, start date, location of employment or workplace, recruitment information (including copies of identity documentation, right to work documentation, references and other information included in a CV or cover letter or as part of the application process), employment records (including job titles, work history, working hours, training records and professional memberships), performance information, disciplinary and grievance information, CCTV footage and other information obtained through electronic means such as swipe card records, information about your use of our information and communications systems and your photograph. Other work related information may be processed.

We will process your personal data for the following purposes:

- Where it is necessary to perform a contract we have entered into with you (the legal basis of 'performance of a contract'), for example to pay you.
- Where we need to comply with a legal obligation (the legal basis of 'compliance with a legal obligation'), for example, under employment legislation, to check that you are legally entitled to work in the UK and to provide you with your legal employment rights.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (the legal basis of 'legitimate interests'). For example: to process your application; review and better understand employee retention and attrition rates; monitor emails for security purposes.

ADELPHI may also need to process information you provide or that we fairly obtain about your criminal convictions and offences (including alleged offences), your health (including any medical condition, health and sickness records), race, ethnic origin, religious beliefs, sexual orientation, your biometric information, for example, your fingerprint or voice print for security purposes, political opinions and trade union memberships ('Special Category Data'). We may process your Special Category Data in the following circumstances:

- with your explicit consent (the legal basis of 'consent');
- where we need to carry out our legal obligations or exercise rights in connection with employment (the legal basis of 'carrying out the obligations and exercising specific rights in the field of employment'), for example to provide you with contractual sick pay;
- where it is needed in the public interest (the legal basis of 'public interest'), such as for equal opportunities monitoring and reporting;
- where it is needed in relation to legal claims (the legal basis of 'the establishment, exercise or defence of legal claims'), for example at an employment tribunal.

We retain your personal data including any Special Category Data while you work for **ADELPHI** and, after you cease working for **ADELPHI**, for as long as is necessary to fulfil our contractual obligations to you, for applicable legal, accounting, or reporting requirements and to provide you with information at your request (such as references).

Commercial and marketing communications

We use the information we collect or receive, such as your email address, phone number, postal address, to communicate directly with you. We may ask you to give us your consent to send you emails containing newsletters or updates or contact you on other ways. If you do not want to receive such communications, you will be given the option to unsubscribe or change your preferences.

Where individuals do not have a relationship with us, for example, if we have identified them from public domain information or purchased a mailing list, as we feel they may have an interest in our services, we shall be relying on our legitimate interests to engage in promotional activities including direct marketing. See the section on Your rights.

People who participate in our market research or health outcomes research projects

ADELPHI uses a network of fieldwork partners and clinical sites to recruit participants to our market research and health outcomes research. Someone from the clinical site or fieldwork agency will contact you to see if you are willing to participate in the research. In some circumstances a member of **ADELPHI** may contact you directly to recruit you to a research project. We process your personal data by obtaining your explicit consent. This means that before we collect any information from you we ensure that you are provided with full details about the purpose and nature of the project and what will happen to the information we collect.

All information provided will remain confidential and will only be reported to the commissioning client combined with other respondent's data so there is no information that can identify you, unless you have given your consent to the contrary. Only members of the direct project team will have access to personal data that might identify you, however, we will only collect and use this information for the purposes of our research with your explicit consent. We collect data in our studies for market research and health outcomes research purposes only, and our use of that information will be limited to that purpose.

Research participation is voluntary and you can withdraw consent at any time.

In some cases we may need to share personal information with third parties that provide research services in support of the research project. Any third party that receives personal information is obligated to follow all of the same privacy protection regulations as followed by Adelphi.

We do not rent, sell or give personal information to any third party for the purpose of directly marketing any products or services. We will not send you unsolicited mail or pass on your email addresses to others for this purpose.

Sharing your personal data

In the relatively few instances where we ask you for permission to pass data on in a form which allows you to be personally identified, we will ensure that the information will be used only for the purposes stated. We process your personal data by obtaining your explicit consent.

Before we share your data we ask you if you are prepared to pass data on in a form which allows you to be personally identified. We will provide you with the following information so you can decide if you wish to consent.

- To whom you will be identified
- What will happen to the information you give
- What, if anything, will happen to you as a result of agreeing to provide this information? For example, you may be re-contacted for further information.

Video or audio recordings

Where you have given your permission for us to share the recording of your interview with the commissioning client company, we shall not disclose your name or contact details. Companies are under a strict legal obligation not to try and identify you from any video or audio recording.

If we share the video or audio recording we obtain your explicit consent by providing you with information on the client company, the usage of the recording and who will view your recording. This will be stated in a consent form which we will ask you read understand and confirm your acceptance. The client company will also sign a form confirming that will only use the recording as agreed by you.

Adverse drug reaction reporting

We are required by the client commissioning the research and regulatory bodies to pass on details of adverse events/product complaints for any of the client's products, mentioned during the course of research interviews/activities. This is solely for drug safety to fulfil their obligation to the regulatory authorities. The processing may take place outside the European Economic Area ("EEA"), or the country where the interview took place. You will only be identified in these reports where you have expressly given your permission. You will be asked at the end of the interview if you give your consent to be identified so drug safety can follow up with you if required. You do not need to provide your details and we will report the adverse events/product complaints anonymously.

At the end of the project **ADELPHI** will check with the client's drug safety department to ensure that all reports have been safely received. At that point any contact details on the reporting form will be removed by **ADELPHI** and we will keep the form without any personal information. Only drug safety will have your contact information.

The drug safety department of the commissioning client may require that your participation information be available for review. This will be solely for drug safety to fulfil their obligation to the regulatory authorities. In order to fulfil this obligation we will keep the audio recording of your interview for up to 10 years for drug safety purposes only. Drug safety will need to apply to Adelphi in writing as to the purpose of the review, who will review and how long drug safety will keep the audio recording. Your name is not associated with the recording and **ADELPHI** and drug safety will not know who you are. We will obtain your explicit consent to keep the audio recording. After 10 years the audio recording will be securely destroyed.

People who use our 3rd Party Websites

We create voting microsites through a 3rd party supplier, on behalf of our commissioning client. These sites are created to collect information on your experiences/opinions. These sites do not have a registration process, they have no user log-in, and so all data collected is anonymous. In terms of the data captured, that obviously depends on the questions we want to ask, and we don't ask for any identification information. IP addresses are captured. IP addresses are required by the system as it prevents spam attacks but also prevents multiple user form submissions to avoid duplicate feedback. The IP addresses are not passed across to our commissioning client, and are deleted after 30 days.

For some 3rd party sites we ask you to register and create a unique account, with a user name and password, by providing your name, email address, and profession. We obtain your personal data with your explicit consent, when you register on the website. This means that before we collect any information from you we ensure that you are provided with full details about the purpose and nature of the project and what will happen to the information we collect.

As part of your account setting you also have the option to subscribe to our monthly newsletter, which is entirely optional. You have the option to withdraw from the monthly newsletter at any time, via the unsubscribe link in the newsletter or by logging into your account settings.

Within your account settings you have the option to list your preferences to the content within the website. The information is used to help personalise the pages you see when you login to the website.

Consent can be withdrawn at any time, by closing your account, where your personal information will be securely deleted, within 30 days.

Personal data is not passed onto 3rd parties.

If your account is inactive for more than 6 months, we will delete your details from our servers.

With all our 3rd party websites, we collect anonymous web statistics using a cloud tool called Google Analytics. This stores a few cookies on the users' computers or mobiles devices to tell us how many people have visited each web page, how they got there, and where they navigate from there. The data collected is completely anonymous and does not store any personal details. If you want to stop our websites collecting usage data about you via Google Analytics, you can disable cookies in your browsers, disable JavaScript in your browser and use Google's Opt-out browser add-on:

<https://tools.google.com/dlpage/gaoptout>

These sites may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

If you use our website

When you visit one of our websites, we will collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. Our web servers capture IP Addresses that are stored in log files by default for troubleshooting connections. We purge all web server log files every **30** days.

We do not make any attempt to find out the identities of those visiting our websites. We will not associate any data gathered from these sites with any personally identifying information from any source. If we do want to collect personally identifiable information through our websites, we will ask your permission and explain what we intend to do with it.

Appropriate security measures are in place, in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from our websites.

Log files

As is true of most web sites, we gather certain information automatically and store it in log files. This information is related to the use of this site and services. We use this information to analyse trends, to administer the site, to track users' movements around the site, to gather demographic information about our user base as a whole and to monitor for malicious activity etc.

Cookies

Like most websites we use 'cookies' to collect anonymous statistics about how people use the site, and to help us keep it relevant for the user. Cookies 'remember' bits of information from your visit to the site.

A cookie is a simple text file that's stored on your computer or mobile device by a website's server. Only that server can retrieve or read the contents of that cookie. Each cookie is unique to your web browser. So if we put a cookie on your computer, it can't be read by any other website.

If you don't want your web visits to be tracked for statistical purposes like this you can set your computer to block cookies at any time. The way in which you do this depends upon the web browser which you use. Go to www.aboutcookies.org to find out more.

How we use cookies to collect statistics

To improve our service, we collect anonymous web statistics using a cloud tool called Google Analytics. This stores a few cookies on the users' computers or mobiles devices to tell us how many people have visited each web page, how they got there, and where they navigate from there. The data collected is completely anonymous and does not store any personal details. If you want to stop our websites collecting usage data about you via Google Analytics, you can disable cookies in your browsers, disable JavaScript in your browser and use Google's Opt-out browser add-on:

<https://tools.google.com/dlpage/gaoptout>

How long do we keep your personal data for?

The length of time we hold your personal information varies depending upon the type of information and its use. We will hold your personal information on our systems only for as long as necessary to provide the services and/or products that you have requested, or for such other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Personal data is kept according to our data retention and deletion policy.

We keep a backup of our data in order to restore the original data after a data loss event. When we delete your personal data it will be deleted from the live storage immediately but there will be a delay before it is removed from the backup data.

Examples of our retention periods are as follows:

| Type | Description | Disposal/Retention Period |
|--|--|---|
| Employment and Career | Written particulars of employment Contracts of employment, including the Certificate of Qualification Changes to terms and conditions, including change of hours letters | For duration of employment and for 6 years after employment ceases |
| | Job History - consolidated record of whole career and location details (paper or electronic) | For duration of employment and for 6 years after employment ceases |
| | Applicant CVs - CVs for successful and unsuccessful candidates | Unsuccessful candidates – delete after 6 months. Successful candidates – CV kept on record |
| Respondent names for use in market research | Respondent names and contact details | Deleted at the end of the project |

Who do we share your information with?

We use selected agents to process your information on our behalf, such as software providers to host our website. Such third parties will be authorised to see and use your information but only to fulfil their contractual obligations to us and will not be permitted to use it for any other purpose. We retain full responsibility for how your personal information may be used by such agents.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff of Adelphi who are operating outside the EEA. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We may share your personal information so that we can comply with a legal obligation to which we are subject. For example: where we are obliged to share your personal information with regulatory bodies which govern our work and services; government departments such as law enforcement and HMRC; court orders etc.

We will process your personal information where there is a legitimate interest in us doing so if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). For example, if you are requesting information about a company or a service from a member of the Adelphi Group of Companies (see section Adelphi Group of Companies), then we may pass your personal data onto another member of the group in order to enable them to appropriately respond to your request. Again unless you consent to the contrary, that member shall only use your personal data to provide the information you have requested.

ADELPHI does not sell, trade or rent your personal information.

How we protect your information?

We generally store and process your information within the European Economic Area (EEA).

Where we need to transfer your information outside of the European Economic Area we only do so to countries which have been determined by the European Commission to have an adequate level of data protection. If we transfer personal information to countries that have not been determined to have an adequate level of protection we do so using a variety of legal mechanisms, including the US Privacy Shield and contracts, to help ensure your rights and protections.

In order to protect your personal data **ADELPHI** employ:

- technical measures, including but not limited to, robust network security, firewalls, anti-virus protection, regular internal and external oversight and inspection, including penetration testing, access controls, audit trails, encryption of devices and data both whilst at rest and during any transmission to and from third parties in order to keep your personal data secure.
- organisational measures including, but not limited to, training of all individuals who process personal data in data protection and information governance, the creation of and adherence to appropriate policies and procedures.

Your rights

ADELPHI tries to be as open as it can be in terms of giving people access to their personal information.

You have specific rights connected to provision of your personal information to **ADELPHI**. These include your rights to request what personal information we may hold about you, if any, and for what purposes. You have the right to request that **ADELPHI**:

- change the consent which you have provided to us in relation to your personal information;
- correct any inaccurate or incomplete personal information which we may hold about you;
- provide you with a complete copy of your personal data;
- provide you with a complete copy of your personal information for you to move elsewhere where you have provided this information by consent or by a contract with us;
- temporarily restrict the processing of your personal information, whilst an objection from you is being resolved;
- permanently erase all your personal information promptly, and confirm to you that this has been done (there may be reasons why we may be unable to do this);
- stop the processing of your personal information for the purpose of direct marketing.

You also have the right to

- withdraw consent that you have provided to us to process your personal information, at any time;
- object to profiling or to any decisions being taken by us by automated means.

If you have a concern about the way we are collecting or using your personal data, or if we do not address your request, or fail to provide you with a valid reason why we have been unable to do so, you have the right to contact the Information Commissioner's Office to make a complaint. They can be contacted via their website <https://ico.org.uk/>

How can you access your information?

You can request to access any personal information that you have submitted to us. The easiest way is to request a copy via the contact details listed below.

Send us an email: compliance.team@adelphigroup.com .

Or write to us at:

Adelphi Group
ATTN: Compliance Department
Adelphi Mill, Bollington
Cheshire SK10 5JB UK

Please ensure that you include your name and clear instructions on what you would like us to do.

If you require us to supply you with details of the personal information that we hold about you, then we will provide this information free of charge and we will provide this information to you within one month of your request unless the request is complex or is numerous requests. If this is the case we will inform you within one month of your request about the reason for the extension of time.

Changes to this privacy policy

We keep our privacy policy under regular review and reserve the right to revise it at any time. Any changes we may make to our privacy policy in the future will be posted on this page. There is a date at the bottom of the page which indicates the date it was updated. Please revisit this policy each time you consider giving personal information.

How to contact us?

If you have any questions or comments about our website's privacy policy or any other aspect of our website, or should you wish to review or request a change to any personally identifiable information that you have submitted to **ADELPHI** via our site, please contact us at the postal address or email address listed below.

Adelphi Group
ATTN: Compliance Department
Adelphi Mill, Bollington
Cheshire SK10 5JB UK
Email: compliance.team@adelphigroup.com .

If you would like to contact the Information Commissioner's they can be contacted via their website <https://ico.org.uk/>



EU-U.S. Privacy Shield: consumer privacy policy

Adelphi's Privacy Shield certification, along with additional information about the Privacy Shield, can be found at <https://www.privacyshield.gov/>.

This policy was last updated on the 18th May 2018.