



DATA PRIVACY POLICY

Clinica Group is committed to respect the relationships and the private life of its customers and all parts involved in its projects.

Clinica Group ensures the protection, the confidentiality and security of all personal information which may be processed in the performance of our services and our business operations.

This Policy explains how we collect, holds, uses and discloses personal information of Individual, either in electronic or paper format, including personal information of our personnel, consumers, healthcare professionals, patients, medical research subjects, clinical investigators, customers, suppliers, vendors and business partners.

Clinica Group intends that this privacy policy and our implementing standard practices and procedures will support timely compliance with Algerian (*law n°18-07 of 10 June 2018*) and European privacy laws and regulations (*European regulation GDPR 2016/679*).

I. Sources of personal information

Under the request of our customers, Clinica Group can manage and process data privacy information from various health projects:

- Clinica Research studies as a CRO,
- Patients support programs as diagnosis projects, health care and therapeutic education, nursing and psychological care,
- Medico marketing projects,
- Promotional activities
- Software development for management improvement of routine care

All clinical and medical information processed by Clinica Group during those projects is done so under contract with our clients. In terms established by the Directive and Regulation, Clinica Group considers that the sponsor/client is ultimately in control of how and why clinical and medical data are processed within our services and as such is the “controller,” whilst Clinica Group and its affiliates are “processors”.

Clinica Group can also collect data to provide solicited information via the website and answer to the needs of relevant persons.

II. Types of personal information and purposes

- *Health Care Professional Information*

HCP includes physicians, pharmacists, dentists, nurses, medical secretary, radiotherapists, medical laboratory scientists, and psychologists, and all allied health professions providing a range of diagnostic, technical, therapeutic and direct patient care and support services, working in public hospital or private office.

Clinica Group analyzes the professional profiles including contact information (email addresses, phone numbers...) of doctors and other health care providers for the purpose of identifying potential



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investigators or other health care professional to assist in clinical and medical research, and all others services described above. Clinica group finds health professional information from its own databases and also indirectly from public sources. For operational purposes, Clinica Group also collects information relating to the involvement and performance of investigators and supporting study staff. The company also process financial information of investigators to support payment for services.

- ***Patients***

Personal information may be used in order to carry out the applicable studies and other study-related services and/or pharmacovigilance. This may include the transfer of such personal information to the applicable study sponsor, its corporate affiliates, business partners and third-party service providers performing services related to the study (e.g., study data management, safety monitoring, biological samples management etc.). Wherever possible, such personal information is non-identified.

- ***Human Resources-Related Information***

Clinica Group collects personal information from applicants seeking employment with the company, including private contact details, professional qualifications and previous employment history to inform employment decisions. We conduct various background checks on applicants, including where law allows on criminal history and professional disbarment. Once employed, Clinica Group collects information on staff for human resource, payroll and tax purposes, management of Personnel performance, and implementation, investigation and reporting on compliance and discipline procedures and matters. Clinica Group will collect and record employee level information in various company systems, consistent with standard business operations. Our company processes similar information relating to consultants, contractors and other third parties engaged by the company to provide products or services to it.

Clinica Group may provide personal information to third parts to support Clinica Group in performance of these human resources-related activities.

- ***Customers Information***

In the course of conducting our business, Clinica Group will interact with employees, consultants, contractors and other third parties employed by our clients, involved in clinical and medical research, or others projects managed by Clinica Group on behalf of our customer. Clinica Group will record and use the names, contact details and other professional information on these individuals for legitimate business-related purposes, including project and financial administration. We may use the information we obtain, including email addresses, to provide relevant information on Clinica Group's services to our clients.

Furthermore, for individuals sharing personal information with Clinica Group in order to inquire about or otherwise make use of our services or purchase, receive or seek information, via the website or



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directly by email or phone, we will use such personal information in order to provide the requested information or services. Such uses may include processing requested transactions, improving the quality of our services, sending communications about the services available, and enabling our partners and third parties to perform certain activities on our behalf.

- *Third parts information*

For individual sharing personal information with Clinica Group in order to receive their offers, provide information, proceed to qualification and manage operational aspects in collaboration with Clinica Group team. We may share personal information of the third part according the customer's request and for the needs of the project.

Clinica Group may also use the personal information collected above to comply with our legal and regulatory obligations, policies and procedures, and for internal administrative purposes.

- *Web Visitors*

Clinica Group collects named information about visitors to company websites where this is voluntarily provided to meet a request from those individuals. In this context, name, phone numbers, email address, and others professional information will be collected to consider the request.

III. Data integrity & Security of collected data

Clinica Group endeavors to use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the Individual.

Clinica Group will employ reasonable and appropriate technical, administrative and physical safeguards designed to protect personal information, particularly sensitive medical data, against loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of data.

Clinica Group ensure the security of exchanged information for all financial transactions.

Clinica Group limits the access to his database for only relevant persons who need this type of information to perform their activities.

Clinica Group sensitizes his employees to the regulations concerning data protection and ensures the respect of those regulations and policies of the company.

Clinica Group performs audits to check the application of this rules.



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Clinica Group's Personnel have a responsibility to assist Clinica Group in maintaining accurate, complete and current personal information.

IV. Retention period of personal data

Clinica Group does not retain personal data more time than necessary to achieve the purpose of the treatment, respecting the applicable legal duration, or any others requirements.

Concerning the customers and the employees, the personals information is maintained during the contractual relation and 10 years after the end of contract.

V. Information and request to exercises rights

- *Information*

Concerned persons should be informed that their personal data are required to perform the services delivered by Clinica Group or to answer to their request. Clinica Group should explain the types of third parties to which the data privacy may be disclosed. Concerned persons should be informed that in case of deletion, opposition or treatment limitation before the end of the contract, the service could be not fully executed.

This explanation, adapted according specific situation of data collection, should be provided as soon as possible, and before any disclosure of personal information or any unexpected use from it was originally collected or subsequently authorized by the concerned person. In this case, the concerned person should explicitly consent to this processing.

In some cases, even if an Individual explicitly does not consent of disclosures of their personal information, Clinica Group may still disclose such personal information:

- if required to do so by law,
- if disclosure is required to be made to law enforcement authorities,
- if we believe disclosure is necessary or appropriate to prevent physical harm to an individual or financial loss or in connection with an investigation of suspected or actual illegal activity.

Clinica Group reserves the right to share an Individual's personal information and contracts with third parts as required or authorized by law or regulation or in response to duly authorized information requests of government authorities.

Clinica Group does not trade or sell personal information.

- *Rights*

Concerned persons, which privacy data are collected, have right to access, including rectification, deletion, limitation of treatment, portability or oppose to their processing.



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Those rights, all questions, comments or concerns can be submitted by sending an email to dataprotection@clinicagroup.com or a courier to the data protection officer, Clinica Group, cité les dunes, domaine propriétaire n°389, lotissement n°4, Chéraga-16002-Algiers, Algeria.

Clinica Group provides answer to the sender, at the latest 15 days after the request.

According the complexity and the number of requests, this can be extended to 1 month. In this case, the concerned requester will be informed of this prolongation.

The information is sent by email, when possible and if the requester does not request another way of communication.

In the case of refusal to access to the request, the data privacy officer should precise the reasons.

However, Clinica Group has no direct relationship with medical research subjects participating in a clinical trial and any such Individuals who seek access, or who seek to correct, amend, or delete their inaccurate personal information should direct his or her query to the relevant study sponsor or investigator which has transferred such personal information to Clinica Group for processing.

To protect your privacy, Clinica Group will take commercially reasonable steps to verify your identity before granting access to or making any changes to your personal information.

V.1. Access Right

Anyone can request the access to his own personal data. The requester can have a copy of his data, or following information:

- purpose of treatment;
- type of concerned personal data;
- recipients or type of recipients;
- when it's possible, the expected duration of retention, or, at least, criteria to determine the duration;
- information about source of data collection;
- if applicable, existence of automated decision, including profiling, and the importance and consequence of this type of treatment for concerned person.

V.2. Correction Right

Anyone has a right to access personal information about themselves, and to amend or correct personal information that is inaccurate, incomplete or outdated. Clinica Group will, on request, may take reasonable steps to correct or complete their personal information if the purpose of the treatment request it and if the burden or expense of providing access is not disproportionate to the risks to that Individual's privacy, within the limit of the applicable law.



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V.3. Deletion right

Anyone has the right to obtain the deletion of his own personal data, in the following cases :

- when those personal data are not necessary anymore to execute the purpose for what it has been collected and treated;
- when the concerned person withdrawn his consent for the founded reason of collected data and there is not another juridical or urgent legitimate reason of the treatment;
- when the concerned person is opposed to the prospection or profiling purpose of treatment;
- if the personal data have been illegitimately treated;
- if the personal data must be deleted to respect an applicable law obligation.

However, the treatment responsible may refuse to delete personal data, in the following cases:

- to respect a legal obligation
- when the treatment is necessary only for statistical purposes
- when the treatment is necessary to make observation or provide evidences in the context of defense of rights in court.

V.4. Portability right

Anyone can ask to recover his personal data or to request a transfer to another treatment responsible, in the following cases:

- when the treatment has been done after consent of the concerned person;
- when the treatment is necessary to execute a contract with the concerned person or to execute a mission requested by this person;
- when the treatment is automated.

V.5. Opposition right

Anyone has the right to oppose the use of his personal data, in the following cases:

- for special situation, when the treatment responsible does not prove that urgent and legitimate reason prevailed over the interests, rights and liberty of the concerned person,
- when the treatment is performed for prospection of profiling, without condition,
- for special situation, when the treatment is performed for statistical purposes.

VI. International Transfer

In the performance of our services and business operations, personal information we collect or receive may be stored or transferred internationally throughout our affiliates, our sisters' companies or to our service providers, in accordance with applicable data privacy laws. Transfers to third parties are covered



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by the provisions in this Policy regarding notice and choice. Clinica Group has put in place measures to ensure that adequate protection is provided to such data where legally mandated.

Where Clinica Group knows that any third party to whom it has provided personal information is using or disclosing personal information in a manner contrary to this Policy, Clinica Group will take reasonable steps to prevent or stop the use or disclosure.

VII. Resort and Responsibilities

Clinica Group encourages Individuals covered by this Policy to raise questions about the processing of personal information about them by contacting Clinica Group through the contact information provided above. Any Personnel that Clinica Group determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment, where applicable.

Any questions or concerns regarding the use or disclosure of personal information should also be directed to Clinica Group through the contact information given above. Clinica Group will undertake reasonable efforts to investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy.

VIII. Data Privacy Policy Changes

Our Data Privacy Policy is not a contract, and it does not create any legal rights or obligations. This Policy may be reviewed and amended from time to time, without advance notice, as new legislation is introduced or as it is amended. All amendments will be posted on the Clinica Group website. Please check back periodically for updates to this Policy.

PRIVACY POLICY EFFECTIVE DATE: February 17, 2019