

SIMR, LLC
PRIVACY NOTICE

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws in the United States and the General Data Protection Regulation (GDPR) which applies across the European Union, and we are responsible as “controller” of that personal information for the purposes of those laws.

- 1. Key Terms.** It would be helpful to start by explaining some key terms used in this notice:

We, us, our	SIMR, LLC d/b/a STATinMED RESEARCH
Personal information	Any information relating to an identified or identifiable individual

- 2. Personal Information We Collect About You.** We may collect and use the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers)	First name, last name and email address

Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	First name, last name and email address
Geolocation data	US state or country, geographic regions and cities
Professional or employment-related information	First name, last name and email address

To the extent that this personal information is required to provide products AND/OR services to you, if you do not provide personal information we ask for, it may delay or prevent us from providing products AND/OR services to you.

3. How Your Personal Information is Collected. We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website and apps. However, we may also collect information:

- From publicly accessible sources (e.g., property records);
- Directly from a third party (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
- From a third party with your consent (e.g., your bank);
- Via our IT systems, including:
 - Door entry systems and reception logs;
 - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems; and
- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting some parts of this site may then be inaccessible or not function properly. Unless you have adjusted

your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our websites.

- **Flash Cookies.** Certain features of our websites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse Flash cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Web Beacons.** Pages of our website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

4. How and Why We Use Your Personal Information. Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- To improve and analyze use of our website and services;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products AND/OR services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or us	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you

Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations

<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> — existing and former customers; — third parties who have previously expressed an interest in our services; — third parties with whom we have had no previous dealings. 	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p>
<p>External audits and quality checks, for audit of our accounts</p>	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

5. Promotional Communications. We may use your personal information to send you updates (by email, text message, telephone or post) about our products AND/OR services, including exclusive offers, promotions or new products AND/OR services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell OR share it with other organizations for such organization’s marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at info@statinmed.com or publications@statinmed.com; or
- Using the “unsubscribe” link in emails or “STOP” number in texts.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products AND/OR services in the future, or if there are changes in the law, regulation, or the structure of our business.

6. Who We Share Your Personal Information With. We routinely share personal information with:

- Our affiliates;
- Service providers we use to help deliver our products and/or services to you;
- Other third parties we use to help us run our business, such as marketing agencies or website hosts and other service providers, including, without limitation, Constant Contact and Hireology;
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers;
- Credit reporting agencies;
- Background check service providers if you apply for a job with us.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We may use third-party service providers to monitor and analyze the use of our website. One such service provider that we may use is Google for its Google Analytics service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

Constant Contact

Constant Contact is an email marketing sending service provided by Constant Contact, Inc. For more information on the privacy practices of Constant Contact, please visit their Privacy Center: <https://www.constantcontact.com/forward/privacy-center>.

Hireology

Hireology is an human resources service provided by Hireology, Inc. For more information on the privacy practices of Hireology, please visit their Privacy Policy: <https://hireology.com/privacy/>

- 7. Personal Information We Sold or Disclosed for a Business Purpose.** In the preceding 12 months, we have not sold any personal information to any third party. We do not sell personal information.

In the preceding 12 months, we have disclosed for a business purpose to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
- Characteristics of protected classifications under California or federal law;
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Biometric information;
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
- Geolocation data;
- Audio, electronic, visual, thermal, olfactory, or similar information;
- Professional or employment-related information;
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA); and
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

8. Where Your Personal Information is Held. Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: “Who We Share Your Personal Information with”). Some of these third parties may be based outside the USA. We require that our service providers and affiliates safeguard your personal information. In these cases, your personal information will also be subject to the laws of the country in which it is used or stored. For more information, including on how we safeguard your personal information when this occurs, see below: “Transferring Your Personal Information Out of the EEA”.

9. How Long Your Personal Information Will Be Kept. We will keep your personal information while you have an account with us or while we are providing products AND/OR services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

10. Transferring Your Personal Information Out of the EEA. For persons located in the European Economic Area (EEA), you should be aware that it by providing such information to us, you are transferring your personal information outside of the EEA. Accordingly, we will share your personal information outside the EEA, e.g.:

- With our offices, if any, outside the EEA;
- With your and our service providers located outside the EEA;
- If you are based outside the EEA; or
- Where there is an international dimension to the services we are providing.

The non-EEA countries to which we may transfer your data do not have the same data protection laws as the EEA. By using our website or otherwise providing your personal information to us, you consent to our sharing of your personal information with third parties located outside of the EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses visit https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

If you would like further information, please contact us (see “How To Contact Us” below).

11. Your Rights Under the GDPR.

Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object: <ul style="list-style-type: none">— at any time to your personal information being processed for direct marketing (including profiling);— in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

12. Your Rights Under the CCPA. If you are a California resident, you have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you; • The categories of sources from which the personal information is collected; • Our business or commercial purpose for collecting or selling personal information; • The categories of third parties with whom we share personal information, if any; and • The specific pieces of personal information we have collected about you. • Please note that we are not required to: <ul style="list-style-type: none"> • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or • Provide the personal information to you more than twice in a 12-month period.
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any personal information we may sell or disclose to a third party for a business purpose, you have the right to know:</p> <p>The categories of personal information about you that we sold and the categories of third</p>

	<p>parties to whom the personal information was sold; and</p> <p>The categories of personal information that we disclosed about you for a business purpose.</p> <p>You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your personal information. If you exercise your right to opt-out of the sale or disclosure of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information. To opt-out of the sale or disclosure of your personal information, submit your request by sending an email to info@statinmed.com.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records. • Please note that we may not delete your personal information if it is necessary to: • Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;

	<ul style="list-style-type: none"> • Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; • Debug to identify and repair errors that impair existing intended functionality; • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; • Comply with the California Electronic Communications Privacy Act; • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; • Comply with an existing legal obligation; or • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
<p>Protection Against Discrimination</p>	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you;

	<ul style="list-style-type: none"> • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information.</p>
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13. Keeping Your Personal Information Secure. We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

14. Do Not Track Policy. Our website does not respond to Do Not Track signals. However, some third party websites do keep track of your browsing activities. If you are visiting such websites, you can set your preferences in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the preferences or settings page of your web browser.

15. Links to Other Websites. Our website may contain links to other websites or social media services that are not operated by us. If you click on a third party link, you will be directed to that third party's site or service. We strongly advise you to review the Privacy Policy/Notice of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

16. How to Exercise Your Rights. If you would like to exercise any of your rights as described in this privacy notice, please email us at info@statinmed.com or call us at 734-222-5426.

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by website, email, phone or in writing, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address; and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with you request will be used solely for the purposes of verification.

17. How to File a GDPR Complaint. We hope that we can resolve any query or concern you raise about our use of your information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

18. Children Under the Age of 18. Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on through the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us. See "How to Contact Us" below.

19. Notice to Persons Outside of the USA. This privacy notice is governed by the laws of the USA. By submitting person information to us, you understand that your personal information will be subject to the laws of the USA and applicable state laws.

20. Changes to This Privacy Notice. This privacy notice was last published on April 29, 2021.

We may change this privacy notice from time to time—when we do, we will inform you via our website.

21. How to Contact Us. Please contact us by email or telephone if you have any questions about this privacy notice or the information we hold about you.

Our contact details are shown below:

Email address and phone contact details
Info@STATinMED.com
734-222-5426

22. Do You Need Extra Help? If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact us” above).

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