

CONTRACTOR PRIVACY NOTICE

Veristat collects and processes personal data relating to our contractors to manage its relationship with them. Veristat is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

WHAT INFORMATION DOES VERISTAT COLLECT

Veristat collects and processes a range of information about you. The type of personal data which we process will include, but may not be limited to, the following:

- your name, business name, address and contact details, including email address and telephone number;
- contractor tax identification number (or social security number if an individual, as applicable and in line with local legislation), and IR35 status;
- full company name as per the Certificate of Incorporation if a Limited company and company registration/ID number
- details of your bank account and VAT registration details;
- the terms and conditions of your engagement as a contractor;
- details of your qualifications, skills, experience, and career history, including start and end dates, and details of third parties to whom you provide services;
- information about your remuneration and expenses, including details of the services and the days and hours on which you provide services under your contractor engagement;
- the duration of any periods during which you are unable to provide the services under your contractor engagement;
- details of insurance contracts maintained and payment of insurance premiums in accordance with your obligations under your contractor engagement; and
- emergency contact details (please inform these third parties of any data you intend to provide to Veristat and of the processing to be carried out, as detailed in this Contractor Privacy Notice)

Veristat collects this information in a variety of ways. For example, data is collected through CVs or resumes; from forms completed by you at the start of or during your engagement; from correspondence with you; or through interviews or other meetings.

In some cases, Veristat collects personal data about you from third parties, such as applications via job boards or recruitment agencies.

Data is stored in a range of different places, including in Veristat's Talent & Culture ("T&C"), Quality Assurance & Compliance (QA&C), Legal, and Finance management systems and in other IT systems (including Veristat's email system).

WHY DOES VERISTAT PROCESS PERSONAL DATA?

Veristat needs to process data to enter into a contractor engagement with you and to meet its obligations under the contractual arrangements between us. For example, it needs to process your data to provide you with contractual agreements and to pay you in accordance with the contract.

In other cases, Veristat has a legitimate interest in processing personal data before, during and after the end of the contractor engagement. Processing contractor data allows Veristat to:

- offer contractor engagements to appropriate and suitably qualified individuals;
- maintain accurate and up-to-date company records and contact details (including details of who to contact in the event of an emergency), and records of contractual rights and obligations;
- operate and keep a record of hours to allow effective workforce management
- ensure effective general T&C and business administration;
- ensure health and safety compliance;
- respond to and defend against legal claims and enforce our legal rights

Depending on the processing activity, Veristat relies on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract
- Article 6(1)(d) in order to protect your vital interests or those of another person

Veristat may process special categories of personal data, such as information about health or medical conditions, with your explicit consent, which can be withdrawn at any time by contacting our Data Privacy Officer (DPO) via data_privacy@veristat.com. Contractors are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

Where the information we process is special category data, the additional bases for processing that we rely on are:

- Article 9(2)(a) relates to processing that is carried out subject to your explicit consent;
- Article 9(2)(b) where processing is necessary for the purposes of carrying out our obligations and exercising the rights of you or the Company in the field of employment law (including such law which also apply to workers);
- Article 9(2)(c), in exceptional circumstances to protect your vital interests or those of another person where you are physically or legally incapable of giving your consent (for example in a medical emergency);
- Article 9(2)(f) for the establishment, exercise or defense of legal claims;

WHO HAS ACCESS TO DATA?

Your information will be shared internally, including with members of the T&C, QA&C, Legal, and Finance teams; your primary point of contact within Veristat; operational staff/managers in the business area to which you provide services; and IT staff if access to the data is necessary for performance of their roles.

Veristat shares your data with third parties that process data on its behalf in connection with making payments.

We may also be required to disclose your personal data to third parties in response to orders or requests from a court, regulators, government agencies, parties to a legal proceeding or public authorities, including to meet national security or law enforcement requirements, or to comply with regulatory requirements or as part of a dialogue with a regulator.

Please contact us if you have any questions regarding recipients of your personal data or would like more details than is set out in this Notice.

TRANSFERS OF PERSONAL DATA

Veristat is a United States headquartered global organization. To operate as a global business, it may be necessary to process and transfer personal data within the Veristat group of companies. Personal data will be processed, transferred, and stored on servers in the UK and the USA.

We may transfer your personal data outside the European Economic Area (“EEA”), Switzerland, or the UK, for example to the USA, Canada, Taiwan, and India to process your contractor relationship and fulfil the purposes described in this Privacy Notice. This may include transferring personal data to countries that have different data protection regimes, and that are not deemed to provide an adequate level of protection for personal data. When personal data collected by our affiliates is transferred outside the EEA, Switzerland or the UK, we use appropriate safeguards required by the EU Regulation 2016/679, the Swiss Federal Act on Data Protection (FADP), or the UK GDPR and UK Data Protection Act 2018 (as applicable) before the transfer of your personal data to a third country that does not provide the same level of protection of your personal data.

Data is transferred outside the EEA, Switzerland, or the UK on the basis of declaration of adequacy (Article 45(1) of the GDPR and the UK GDPR), and by the Federal Data Protection and Information Commissioner (FDPIC) for Switzerland.

In the absence of an adequate level of protection by a third country or an international organization, Veristat will implement alternative safeguards to protect the personal data during transfer and for the duration it is processed and/or stored with the third country or international organization. In particular, Veristat will rely on the standard data protection clauses listed in Article 46 of the GDPR and of the UK GDPR and will implement any additional safeguards that would be necessary in relation to the specific transfer to protect the rights and freedom of the individuals concerned.

If you wish to know what safeguards we use to transfer your personal data, please contact the Data Privacy Team, data_privacy@veristat.com

DATA PRIVACY FRAMEWORK (DPF)

Veristat and its U.S. operating subsidiary, Instat Clinical Research (collectively referred to as “Veristat”) complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Veristat has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Veristat has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit: <https://www.dataprivacyframework.gov/>

ONWARD TRANSFERS

Veristat will endeavor to only transfer personal information to a third party/agent where such third party/agent has given assurances that it provides at least the same level of privacy protection as required by the DPF Principles and this Privacy Notice and will notify Veristat if it makes a determination that it can no longer meet this obligation.

Where Veristat has knowledge that a third party/agent is using or disclosing personal information in a way that is contrary to the DPF Principles and/or this Privacy Notice, Veristat will take reasonable steps to prevent or stop the use or disclosure. With respect to onward transfers to third parties/agents, the DPF requires that, to the extent it is responsible for the event, Veristat shall remain liable should its agents’ process personal information in a manner inconsistent with the DPF Principles, and Veristat accepts and shall follow this principle.

Veristat’s accountability for personal information that it receives under the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) and subsequently transfers to a third party is described in the EU-U.S. Data Privacy Framework (EU-U.S. DPF) Principles. In particular, Veristat remains responsible and liable under the EU-U.S. Data Privacy Framework (EU-U.S. DPF) Principles if third party agents that it engages to process the personal information on its behalf does so in a manner inconsistent with EU-U.S. Data Privacy Framework (EU-U.S. DPF) Principles, unless Veristat proves that it is not responsible for the event giving rise to the damage.

HOW DOES VERISTAT PROTECT DATA?

Veristat takes the security of your data seriously. Veristat has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties. Details of these measures are available in our

controlled documents (e.g., policies and Standard Operating Procedures (SOPs)) located in our controlled documents repository and by request from the Data Privacy Team.

Where Veristat engages third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality, and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

FOR HOW LONG DOES VERISTAT KEEP DATA?

Veristat will hold your personal data for the duration of your engagement as a contractor, with the exception of personal data that need to be retained for regulatory purposes (e.g. your CV, your training records). The periods for which your data is held after the end of your engagement are set out in our Retention of Corporate Records SOP . Veristat shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed, including for the purposes of satisfying any legal, quality, regulatory, accounting, or reporting requirements.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current to allow us to process the contractor relationship. Per data protection regulations, you, as “data subject”, also have a responsibility to ensure that changes in personal circumstances (for example, change of address and bank accounts) are notified to Veristat so that we can ensure that your data is up to date.

YOUR RIGHTS

As a data subject, you have a number of rights related to the information that we hold about you, these rights and how to use them are explained below. You can:

- access and obtain a copy of your data on request, known as a “subject access request” (right of access);
- require Veristat to change inaccurate or incomplete data (right to rectification);
- request that Veristat delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing (right to erasure);
- object to the processing of your data where Veristat is relying on its legitimate interests as the legal ground for processing (right to object);
- where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to Veristat in a structured, commonly used and machine-readable format and also to require us to transmit it to another controller where this is technically feasible (right to data portability); and
- ask Veristat to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override Veristat’s legitimate grounds for processing data (right to restriction of processing)

If you have any questions, need more information or guidance, or would like to exercise any of these rights, please contact the Data Privacy Team at data_privacy@veristat.com or via our registered business address in the “**YOUR CHOICE**” section below.

Please mark the envelope “Data Protection Officer”. You can also make a subject access request by completing Veristat’s Subject Access Request Form, available in our LMS or by request .

If you believe that Veristat has not complied with your data protection rights, you can complain to the Supervisory Authority of the country where you live, work, or where an alleged infringement has occurred.

If you wish to investigate the exercising of any of these rights, please contact the Data Privacy Team at data_privacy@veristat.com.

YOUR CHOICE

Veristat offers individuals the opportunity to choose (opt out) whether their personal information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals.

For sensitive information, Veristat will obtain affirmative express consent (opt in) from individuals if such information is to be (i) disclosed to a third party or (ii) used for a purpose other than those for which it was originally collected or subsequently authorized by the individuals through the exercise of opt-in choice. In addition, Veristat will treat as sensitive any personal information received from a third party where the third party identifies and treats it as sensitive.

Please contact:

<p>Data Privacy Officer (“DPO”) Veristat, 134 Turnpike Road, Suite 200, Southborough, MA 01772, USA</p> <p>data_privacy@veristat.com</p>	<p>Data Privacy Officer (“DPO”) Veristat, 27 Old Gloucester Street, London, WC1N 3AX, UK</p> <p>data_privacy@veristat.com</p>
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RECOURSE, ENFORCEMENT AND LIABILITY

Veristat commits to resolve inquiries and complaints about its processing of personal data in compliance with this Privacy Notice and applicable data protection laws. Individuals with inquiries or complaints regarding this Privacy Notice may first contact Veristat at data_privacy@veristat.com.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Veristat commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to the International Centre for Dispute Resolution-American Arbitration Association (ICDR-AAA), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of

your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit https://go.adr.org/dpf_irm.html for more information or to file a complaint. The services of ICDR-AAA are provided at no cost to you.

An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. To learn more, please visit: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>

The Federal Trade Commission (FTC) has jurisdiction over Veristat's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?

You have some obligations under your contractor contract to provide Veristat with data. In particular, you are required to report periods during which you are unable to provide services and may be asked to provide details of the insurance policies you maintain in accordance with your contractor engagement.

Certain information, such as contact and payment details, has to be provided to enable Veristat to enter into a contractor engagement with you. If you do not provide other information, this will hinder Veristat's ability to administer the rights and obligations arising as a result of the contractor engagement efficiently.

AUTOMATED DECISION-MAKING

Decisions relating to your contractor engagement are not based solely on automated decision-making.

WHISTLEBLOWING

Veristat has a procedure in place to enable our contractors to have an avenue for raising concerns about malpractice. If you wish to raise a concern please contact our Director, Talent & Culture – Europe and Asia Pac within our Talent & Culture team. Information in this context is processed by Veristat because it is necessary for our compliance with our legal obligations under the Directive (EU) 2019/1937, the Public Interest Disclosure Act 1998 and the Public Interest Disclosure (Northern Ireland) Order 1998.

Veristat will process any personal data collected during the disclosure in accordance with our Data Privacy Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Although every effort will be taken to restrict the processing of your personal data and maintain confidentiality whether this is possible will be dependent on the nature of the concern and any resulting investigation.