

Notice of Personal Data Processing Related to Innovative Trials Patient Insights Study Participants

This Privacy Notice is addressed to: Innovative Trials Patient Insights participants

Innovative Trials is required by law to protect your personal data. This Notice explains how we process (e.g. collect, use, store, and share) your personal data. We will process any personal data about you in accordance with this Notice and with applicable law.

1. WHO ARE WE?

The company responsible for processing your personal data is:

Innovative Trials Ltd
Innovative House
Avenue One
Letchworth Garden City
SG6 2WW

You can always contact UK Data Protection Responsible Person at privacy@innovativetrials.com with questions or concerns about how we process your personal data.

2. HOW DO WE COLLECT PERSONAL DATA ABOUT YOU?

We get your personal data from the following sources:

- From you directly via a Google form as part of your participation in the Innovative Trials Patient Insights research.
- Health and care research should serve the public interest, which means that we have to demonstrate that our research serves the interests of society as a whole. We do this by following the [UK-policy-framework-health-social-care-research](#).

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We process personal data about you for the following purposes:

- We use personally-identifiable information to conduct research to improve health and care. This means that we will use your data, collected in the course of a research study, in the ways needed to conduct and analyse the research study.
- When your personal data is transferred and processed outside the EU/EAA (by our client) is being anonymised, this means that it is not identifiable anymore. The information will only be used for the purpose of health and care research, and cannot be used to contact you.

4. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

For the purposes described above in Section 3, we may process the following types of personal data:

- Contact information (name, telephone number, email address)
- Data revealing racial or ethnic origin;
- Year of birth
- Experience of clinical trials that may result in the disclosure of personal health information
- State of residence

This data is retained in a secure drive accessed only by the relevant study team. Anonymised data will have no limit on retention, and identifiable data will be retained for a reasonable period of time following the full completion of the study, we anticipate this to be no longer than 12 months post study completion.

5. WHY ARE WE ALLOWED BY LAW TO PROCESS YOUR PERSONAL DATA?

Our processing of your personal data requires a legal basis.

We will not process your personal data if we do not have a proper justification foreseen in the law for that purpose. Therefore, we will only process your personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations; or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

6. HOW DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with:

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by, or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- our Innovative Trials employees working on this research project
- our IT systems providers, cloud service providers and database providers;
- The client for whom we are conducting this research. Data received by the client will be anonymised with no identifiable data outlined in section 3 of this notice.

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

7. WHEN DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EU/EAA?

Your personal data will not be sent to our client based in the USA. Data transferred and processed outside the EU/EAA is being anonymised, this means that it is not identifiable anymore. The information will only be used for the purpose of health and care research, and cannot be used to contact you. Your data will not be sent to any alternative country. The information shared will only be used for the purpose of health and care research. Only anonymised research data will be shared with our client.

8. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

9. WHAT ARE YOUR RIGHTS?

In general, you have the following rights:

- You can get an overview of what personal data we have about you
- You can get a copy of your personal data in a structured, commonly used and machine-readable format
- You can get an update or correction to your personal data
- You can have your personal data deleted or destroyed
- You can have us stop or limit processing of your personal data
- If you have given consent for us to process your personal data (see Section 5), you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent
- You can submit a complaint about how we process your personal data to a Data Protection Authority.

Your rights to access, change or move your information are limited, as we need to manage your information in specific ways in order for the research to be reliable and accurate. If you withdraw from the study, we will keep the information about you that we have already obtained. To safeguard your rights, we will use the minimum personally identifiable information possible.

If you are not satisfied with our response or believe we are processing your personal data in a way that is not lawful you can complain to the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>