

# Data Policy for customers, partners and applicants

Version 1.0

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## 1. Purpose

The purpose of this privacy policy is to ensure transparency and legality in our processing of personal information towards customers and partners.

BioStata respects everyone's right to privacy and the right to proper and lawful processing of their personal information. Being a company performing statistical analysis and data management in clinical trials, it is of high importance for BioStata that our various stakeholders have confidence in our processing of confidential and personal information.

## 2. Contact

In case of questions related to procession of personal data, please contact:

Peter Lipczak, COO

Email: [pl@biostata.com](mailto:pl@biostata.com)

Phone: +45 20100556

## 3. Basis and purpose

We process different types of personal information, which depends on whether it is a participant in a clinical trial, a partner, customer or an applicant.

Most of our personal information comes from participants in clinical trials as well as our employees.

We also receive personnel information about website visitors via cookies when you visit our website if you accept this (<https://biostata.com/cookie-policy/>)

In some circumstances, we process personal data on behalf of Life science companies and in these cases, we are the data processors. You can read more about what this means for you and your rights in section 3.1 of this Privacy Policy. When BioStata is the data processor, we are subject to the data controller's instructions regarding transfer, rights, etc. See more in section 8.

### **3.1 Customer/Partner.**

We only process information about our customers/partners needed interact with our customer or partner.

BioStata's authority to process the personal data derives from BioStata's legitimate interest in the customer relationship, see article 6 (1) (f) of the General Data Protection Regulation, as well as the natural necessity of possessing personal data relating to the contract prior to entering a contract or cooperation with you.

### **3.2 Applicant**

If you apply for a position at BioStata, we will not process more information than is necessary to assess your application, and we will only retain your information for maximum of 6 months if you do not receive the position, cf. below in section 6 and 7

BioStata's legal basis for processing your personal data derives from the legitimate interest that BioStata has in assessing your application, and the obvious need for BioStata to evaluate the professional and personal qualifications of an applicant before entering and employment contract with him or her; cf. article 6 (1) (f) of the General Data Protection Regulation.

All the data referred to below will be processed in full confidentiality in accordance with the General Data Protection Regulation.

## **4. Data types**

### **4.1 Customer/Partner**

During the interaction with customers and partners we process the following information:

- Name, Phone number and email address on contacts.

## 4.2 Applicant

In connection with recruitment, we process the following information about you:

- Name, address, phone number and e-mail
- CV
- Application
- References
- Diplomas
- Possibly, other information that is relevant for the employment.

## 5. Disclosure of personal data

Your data may be transferred to our data processors. BioStata does not pass on information about you to third parties without your consent unless we are legally bound by law or otherwise.

### 5.1 Customer/Partner

Information is – in some cases -passed on to our lawyer, accountant firm, our accounting system and our time registration system.

### 5.2 Applicant

If you apply for a position at BioStata, we will – when needed – pass on your personal information to our HR consultant and/or recruitment agency.

We normally receive the above-mentioned data directly from you. However, in certain situations we may have obtained the information through websites in the public domain, public phone registers, or network associates. In such cases, you will naturally be informed during our initial contact.

## 6. Rights

Pursuant to the EU Data Protection Regulation and the Danish Data Protection Act, you have a number of rights that you can invoke in connection with BioStata's processing of personal data. These rights are as follows:

## 6.1 Duty to provide information

Upon collection of information and, we must inform you of the following:

- Who we are as accompany?
- The purpose of the processing, and on what legal basis
- How long we store your information, or what criteria are used to determine the length of storage
- Your rights to request access, correction, deletion or restriction of your information
- Your right to freely withdraw a consent
- Contact information for our data protection adviser (if applicable)
- Your opportunity to complain

## 6.2 Right of access

You have the right to access that information we process about you, and right to get a copy of any information which we store, including information about who has provided the information, if they do not come from yourself.

However, you must be aware that this right may be restricted because of the research section one of the Danish Data Protection Act.

## 6.3 The right to delete and the right to have information corrected

You have the right to have the information about you deleted or corrected.

You have the right to have your information deleted when they are no longer needed or if you choose to withdraw your consent to our data processing. However, there might be situations where the company cannot fulfill this request- Specifically if there is a legal obligation or a balancing of interest's evaluation concludes that the information shall be retained.

## 6.4 Opportunity to appeal

You have the right to complain to the Danish Data Protection Agency if you believe, we process your information illegally or if you believe we do not comply with your rights.

You can read more about your right of appeal on the Danish Data Protection Agency's website:

<https://www.datatilsynet.dk/borger/klage>

## **6.5 The Right to Object**

You have the right to object to the company's processing of your personal information.

However, if the company has a compelling legitimate ground for the processing or needs to process the personal data to defend legal claims, the right cannot be fulfilled.

## **6.6 The Right to Data portability**

In some cases, you are entitled to have your personal data returned in a structured, commonly used and machine-readable format or transferred to another data controller

## **7. Deadlines for storage and deletion**

### **7.1 Customer/Partner**

We always keep relevant information for at least 5 years for the sake of the Danish Accounting Act. Information not covered by this act is kept for 3 years after termination of corporation, should any dispute between the company and the customer/Partner arise.

### **7.2 Applicant**

We only store job applications as we have received for a period of up to 6 months.