

# Privacy Notice

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Effective Date: insert

## Introduction

Innovaccer Ltd (“Innovaccer,” “we,” and/or “us”) provides a health care data platform. We also host and sponsor industry events. This privacy notice (“Notice”) applies to the

personal information that Innovaccer, its subsidiaries and affiliates worldwide within the Innovaccer family of companies ("Affiliates") process through your use of this site (the "Website") and attendance at conferences, webinars and events ("Events") as well as our marketing communications with you. You can find out how to contact us at the end of this Notice.

The term Personal Information used in this Notice is equivalent to the term "personal data" under applicable European and UK data protection laws.

## What information does Innovaccer collect?

### Personal information you provide to us

#### From our Website or Events

We may collect personal information that you send us or provide to us, for example via our online forms or when registering for events or newsletters. If you contact us through our Website, we will store our correspondence with you.

If you attend an Event, we may collect your contact information, and may obtain your work profile, interests, and any other information that you choose to provide.

### Personal information we collect automatically

#### From our Website

When you visit our Website, we may collect information about activities on the internet or other electronic networks. Depending on your tracking preferences, the information we collect may include, but is not limited to, your device's internet protocol ("IP") address, the referring website, the pages your device visited, and the time your device visited our website.

### Information obtained from Third Parties

We may also receive additional information about you from other third parties, such as list providers or data brokers and combine it with other personal information we have about you.

## Information obtained from public sources

We may also obtain Personal Information about you from social media platforms such as LinkedIn where we aim to identify businesses that could be interested in our Events, products and services. If we contact you through a social media platform, you can choose not to accept any connection request or message. If you choose to engage with us through a social media platform, we will collect your name, contact details and place of work to use for marketing purposes.

## How and on what grounds does Innovaccer use the information we collect?

### Personal information we collect directly from you from our Website or Events

We use the personal information we collect from our Website or Events for the following purposes:

- for trend monitoring, marketing and advertising.
- for purposes communicated to you at the time you provided your personal data, e.g. to provide you with information about our services that you have requested.
- as part of our efforts to protect our websites.

Our use of your personal information is based on our legitimate interests to improve network, information security and business performance. We will also rely on legitimate interests for direct marketing purposes when we send marketing to business recipients.

## How does Innovaccer share and disclose the information we collect to Third Parties?

We share and disclose Personal Information in the following limited circumstances:

### Vendors, consultants, and other service providers

We may share your Personal Information with third-party vendors, consultants, and other service providers we employ to perform tasks on our behalf. These companies include (but are not limited to) email service providers. If Innovaccer receives your Personal Information in the United States and subsequently transfers that information to a

third-party agent or service provider for processing, Innovaccer remains responsible for ensuring that such third-party agent or service provider processes your Personal Information to the standard required by the applicable privacy laws, including the GDPR.

For more information, please see the International data transfers section below.

## **Event sponsors**

When you attend our Events, we ask your preferences on sharing your contact details with the Event sponsor/s. Based on your choice, we may share your contact details (such as your name, email address, company name, and phone number) with the Event sponsor/s. If you'd like to opt-out of sharing your details with sponsors, you can always choose not to consent at the time of registration or by submitting a request thereafter.

## **Business transfers**

We may choose to buy or sell assets and may share and/or transfer Personal Information in connection with the evaluation of and entry into such transactions and based on our legitimate interests. Also, if we or our assets are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information may be one of the assets transferred to or acquired by a third party.

## **Innovaccer group companies**

We may also share your Personal Information within the Innovaccer family of companies for purposes consistent with this Notice and based on our legitimate interests.

## **Protection of Innovaccer and others**

We reserve the right to access, read, preserve, and disclose any Personal Information as necessary to i) comply with a law or a court order, or ii) protect the rights, property, or safety of Innovaccer, our employees, our users, or others.

## **Disclosures for national security or law enforcement**

Under certain circumstances, we may be required to disclose your Personal Information in response to valid requests by public authorities, including to meet national security or law enforcement requirements, based on our legitimate interests or legal obligations.

## For how long does Innovaccer store your personal information?

We store your Personal Information for different time periods depending on the category of Personal Information. Some information may be deleted automatically based on specific retention schedules, such as marketing information. Finally, we may further retain information for business practices based on our legitimate interests or legal purposes, such as network improvement, fraud prevention, record-keeping, or enforcing our legal rights.

## Your privacy rights

### What choices do I have?

Every user is entitled to the following rights:

- The right to access- You have the right to request copies of your personal information. We may charge you a small fee for this service.
- The right to rectification- You have the right to request that we correct any personal information you believe is inaccurate. You also have the right to request that we complete personal information you believe is incomplete.
- The right to erasure- You have the right to request that we erase your personal information, under certain conditions.
- The right to restrict processing- You have the right to request that we restrict the processing of your personal information, under certain conditions.
- The right to data portability- You have the right to request that we transfer the personal information we have collected to another organization, or directly to you, under certain conditions.
- The right to withdraw consent – you have the right to withdraw your consent in relation to receiving marketing communications from us or where you have otherwise provided your consent for our processing of your personal information.

You can always opt not to disclose information to us.

## Marketing communications

You can opt-out of receiving certain promotional or marketing communications from us at any time by using the unsubscribe link in the emails communications we send, or by filling out this request form.

## How can I exercise my privacy rights?

If you would like to access, review, update, rectify, and delete any Personal Information we hold about you, or exercise any other data subject right available to you under the UK General Data Protection Regulation (UK GDPR), fill out this request form. Our privacy team will examine your request and respond to you as quickly as possible. Please note that we may still use any aggregated and anonymous Personal Information that does not identify any individual and may also retain and use your Personal Information as necessary to comply with our legal obligations and resolve disputes.

We are committed to resolve complaints about your privacy and our collection or use of your Personal Information. Please contact Innovaccer at: Courtney Willenzik, Data Protection Officer, [compliance@innovaccer.com](mailto:compliance@innovaccer.com).

We remind you that you also have a right to lodge a complaint with a supervisory authority should you feel unsatisfied with our treatment of your Personal Information. The regulator in the UK is the Information Commissioner's Office and their website is at [www.ico.org.uk](http://www.ico.org.uk).

## International data transfers

Innovaccer may transfer Personal Information from the EEA or the UK to other countries, including Personal Information we receive from individuals residing in the EEA or the UK who visit our Website or otherwise interact with us at an Event. When Innovaccer engages in such transfers of Personal Information, if we are not transferring personal information to a country considered adequate or safe, it relies on safeguards provided by the Standard Contractual Clauses recognised by the European Commission or UK Government. If you have any questions about the safeguards we implement, please contact us using the details below.

## Changes to this Notice

We are constantly trying to improve our practices, so we may need to change this Notice from time to time. We will alert you about material changes by, for example, placing a notice on our Websites and/or by sending you an email (if you have registered your e-mail with us) when reasonably practicable. You can see when this Notice was last updated by checking the date at the top of this page.

# Contact Us

Controller's Contact Information: Innovaccer Ltd, Gorse Stacks House, George Street,  
Chester, United Kingdom, CH1 3EQ

Data Protection Officer  
Courtney Willenzik,  
[compliance@innovaccer.com](mailto:compliance@innovaccer.com)