

## Cello Health Advantage Privacy Notice, Including GDPR

Cello Health Advantage, an operating company of Cello Health US, is committed to protecting your personal information and to adhering to appropriate data privacy laws. Cello Health Advantage collects and processes data relating to people from both inside and outside the United States of America. This privacy policy relates to data collected and processed about residents of the European Union countries, including the United Kingdom. It states how we collect your personal information, how we store it, and how we use it.

This privacy policy applies to our websites and our products and services, which are offered by Cello Health operating companies to residents of the European Union and the UK.

The purpose of this policy is to explain about how Cello Health collects and uses the personal information you provide to us and that we collect. We ensure that we use your information in accordance with all applicable laws and corporate policies concerning the protection of your personal information.

If you have any queries about this policy or your personal information, please contact:

**Andy Dallas**  
**Data Protection Officer**

Cello Health  
11-13 Charterhouse Buildings  
London  
EC1M 7AP  
UK

Email: [privacyusa@cellohealth.com](mailto:privacyusa@cellohealth.com)

Call: +44 (0)20 7608 9300

### Responsibilities

The Data Protection Officer, Andy Dallas, is responsible for ensuring that this policy is made available to EU and UK residents prior to Cello Health collecting and processing personal information.

All employees of Cello Health who interact with individuals are responsible for ensuring that this notice is drawn to the individuals' attention.

### Who are we?

Cello Health Advantage is a division of Cello Health US, which is a division of Cello Health plc. Cello Health plc is a global healthcare-focused advisory group comprising a set of leading clinical and commercial advisory capabilities that serves 24 of the top-25 pharmaceutical clients globally, as well as a wide range of biotech, diagnostic, device, and other key nonhealthcare clients.

Cello Health plc enables clients to differentiate their propositions and drive success in ever more complex global markets. We deliver our services through nearly 500 highly skilled professionals utilizing the latest thinking, technology, and digital solutions. Cello Health plc delivers its services from an office network in the US and UK, with hub offices in New York, Philadelphia, London, and Farnham.

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Cello Health Advantage (formerly Advantage Healthcare) is a global boutique firm primarily supporting new/in-licensing/outlicensing products and services in pharmaceuticals, biologics, medical devices, diagnostics, and combination products.

Our core competencies include commercial assessments, analogue intelligence (benchmarking), thought leader access/input, and plan development. We have an excellent, 24-year track record in specialty products, including vaccines and rare diseases. In addition, we offer a rapid response service, with the ability to turn a project around in half or less of the usual time.

### Information Collected

- We may collect your contact information such as full name, company name, email address, postal address, and telephone number when you email or call us with an inquiry, an application for work, or when you participate in market research.
- All market research will blind any personal information that we or our research/recruiting partners and panels may use; the blinding is for all clients or any individuals or associations outside of our organization.
- We may be passed information, lawfully collected by our clients, who want us to ask you whether you would like to participate in market research, consultancy projects, advisory boards, or events; this information may include your full name, job title, company name, email address, telephone number, postal address, and may also include information about your area of specialization or health status.
- We may also collect your details from publicly available sources or purchase lists from suppliers operating within data protection regulations.
- When we conduct market research, we may collect additional information from you, but only with your consent; you will be provided with the full details of the information we wish to collect at the time we ask for your consent.
- In addition to the above, we automatically collect information about your visit to our website; please see our Cookies Section for more details.

The personal information we collect will be used for the following purposes:

- For those who fill out the form in our website or contact us about employment, dealing with inquiries and requests about our services submitted to us via email or call.
- Sending you information about our services, which are applicable to you in your role.
- Requesting information about your services, which are applicable to you, your company, our company, and our clients.
- Conducting market research surveys; we will always ask for your consent to do so.
- Offering you the opportunity to take part in medical advisory boards, events, or consulting projects.
- To assess applications for jobs we have on offer.

Our legal basis for processing of your personal information is:

- Where you have given consent for the processing of data for a specific purpose.
- Processing is necessary to meet contractual obligations entered into by you.

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- Processing is necessary for purposes of legitimate interest pursued by our company but are in relation to experiences/opinions that you are sharing in research, goods and services that you use in your role, or are in relation to your application for a job.

The legitimate interests pursued by us are as follows:

- In response to an inquiry from you about our good and services.
- For the purposes of promoting our goods and service via direct marketing, which are applicable to you in your role; we will always confirm how your personal information was obtained and always offer an opt-out of marketing communications.
- Inquiring about your goods and services, which are applicable to our company or our clients; we will always confirm how your personal information was obtained and always offer an opt-out of marketing communications.
- For participation in bona fide market research studies.
- In response to your application for a job that we have advertised or about which we have contacted you.

### How we protect your information

We adopt appropriate data collection, storage, and processing practices and security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal or transactional information stored on our website and systems. For more information on how we protect your personal information, please contact our Data Protection Officer (contact details at the top of the page).

### Marketing

We believe in being open, honest, and transparent with our clients, suppliers, and advisors, and want you to feel comfortable about your decision to give us your personal information and with how we use it.

For our clients or potential clients, we will use the details you provide to us to communicate with you about how we can help you in your role, and help your company achieve its objectives.

We promise that we will only communicate with you in the way you wish, and we will always respect your privacy. You can change your mind at any time, and it is quick and easy to let us know that you no longer want to hear from us by the current mechanism in place in marketing communications and/or by contacting our Data Protection Officer (contact details at the top of the page).

We will always respond to your wishes in a sensitive, timely, courteous, and professional way.

Please be assured that we will take appropriate measures to keep your personal information safe and secure and we promise not to overcontact.

### Disclosures

We will never pass your personal information on to other organizations for them to use for their own marketing purposes.

However, we may disclose your personal information in the following circumstances:

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- To third parties who provide a service to us such as market research fieldwork agencies, email services providers or data processors: we require these third parties to strictly comply with our instructions and data protection laws, and we ensure that appropriate controls are in place; we enter into contracts with all our third-party partners and regularly monitor their activities to confirm compliance with our policies and procedures.
- To clients: we have strict agreements with client companies to limit what they can do with the data we give them, which is blinded on all market research activities; we will always ask for your consent before passing on your personal information to any client.
- Where we are under duty to disclose your personal information to comply with law or the disclosure is “necessary” for purposes of national security, taxation, and criminal investigation, or we have your written consent.

For a list of third parties that we use in the normal course of business, please contact our Data Protection Officer (contact details on page 1).

### Keeping your personal information

We keep your personal information for up to 7 years to operate the service in accordance with legal requirements and tax and accounting rules. Where your information is no longer required or is no longer relevant, we will ensure it is disposed of in a secure manner.

### Your rights (for EU/UK citizens)

At any point while we are in possession of your personal information, you have the following rights:

1. The right to access your personal information.
2. The right to edit and update your personal information.
3. The right to request to have your personal information deleted.
4. The right to restrict processing of your personal information.
5. The right to object.
6. The right to lodge a complaint with a supervisory authority.

#### 1. The right to access your personal information

You have a right to obtain confirmation that your personal information is being processed. You also have the right to request a copy of your personal information that we hold.

If you wish to make a request to see your personal information, please complete the [Subject Access Request Form](#). Alternatively, please ensure you provide us with all the requested information in an alternative format to help us locate your records.

We will provide a copy of your personal information within 30 days of receiving the written request. Should you wish to exercise these rights, we require you to prove your identity with 2 pieces of approved identification (photo ID and proof of address, such as utility bill). Please address requests to our Data Protection Officer (contact details on page 1).

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### 2. The right to edit and update your personal information

The accuracy of your personal information is important to us. You can edit your personal information, including your address and contact details, at any time. Please address requests to our Data Protection Officer (contact details on page 1).

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take up to 28 days before they take effect, so you may receive communication within this period.

### 3. The right to request to have your personal information deleted

You have the right to request the deletion of your personal information, which we will review on a case-by-case basis.

Should you wish to exercise this right, please address requests to our Data Protection Officer (contact details on page 1).

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take up to 28 days before they take effect, so you may receive communication within this period.

### 4. The right to restrict processing of your personal information

You have the right to “block” or suppress processing of your personal information. However, we will continue to store your data, but will not process it any further. We do this by retaining just enough of your personal information so as to ensure that the restriction is respected in the future.

Should you wish to exercise this right, please address requests to our Data Protection Officer (contact details on page 1).

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take up to 28 days before they take effect, so you may receive communication within this period.

### 5. The right to object

You have the right to object to your personal information being processed for marketing (including profiling) and for research purposes. From the very first communication from us and every marketing communication we send after, you will have the right to object to marketing.

Alternatively, you can exercise this right by contacting our Data Protection Officer (contact details on page 1).

Please provide as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take up to 28 days before they take effect.

If we process your personal information for the exercise or defense of legal claims, or we can demonstrate compelling grounds that override your rights and freedoms, we may not be able to fulfill your request. In such a case, we will contact you to discuss further.

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### 6. Your right to lodge a complaint with a supervisory authority

Since Cello Health plc is a publicly listed company in the UK, our supervisory authority is the Information Commissioner's Office in the UK. If you wish to lodge a complaint or seek advice from a supervisory authority please contact:

#### The Office of the Information Commissioner

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Website: [www.ico.org.uk](http://www.ico.org.uk)  
Tel: +44 (0) 01625 545 745

### Other websites

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

### Where we store your personal data

Given that our business operates within the US and the EU, the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by our staff, or staff at one of our suppliers operating outside the EEA. By submitting your personal data, you agree to this transfer, storing, or processing.

We will take all appropriate and proportionate steps necessary to secure your data and make sure it is treated in accordance with this privacy policy. We ensure that our third-party contractors and service providers follow similar standards of security and confidentiality.

Unfortunately, the transmission of information across the Internet is not completely secure. Although we will do our best to protect your personal data by using technical measures such as encryption, we cannot guarantee the security of your data transmitted to our site and, therefore, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security measures to protect your data from unauthorized access or disclosure.

### Children

We recognize the need to provide additional privacy protections with respect to personal information we may collect from children. We do not target children with our products and services; however, occasionally we run market research projects that involve collecting personal data from child participants younger than 18 years. When we collect personal information from children, we take additional steps to protect children's privacy, including:

- Notifying parents about our information practices regarding personal data about children, including the types of personal information we will collect, the uses to which we may put that information, and whether and with whom we may share that information.
- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children.

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- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in the market research study.
- Giving parents the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted.

### Cookies Policy

We use cookies and/or similar technologies to analyze customer behavior, administer the website, track users' movements, and to collect information about users. This is done in order to personalize and enhance your experience with us.

A cookie is a tiny text file stored on your computer. Cookies store information that are used to help sites work. Only we can access the cookies created by our website. You can control your cookies at the browser level. Choosing to disable cookies may hinder your use of certain functions.

We use cookies for the following purposes:

- Necessary cookies—these cookies are required for you to be able to use some important features on our website, such as logging in in the future when this function may be available; these cookies do not collect any personal information.
- Functionality cookies—these cookies provide functionality that make using our service more convenient and provide more features; for example, they might remember your name and e-mail in comment forms so you do not have to re-enter this information next time when commenting.
- Analytics cookies—these cookies are used to track the use and performance of our website and services.

You can remove cookies stored in your computer via your browser settings. Alternatively, you can control some 3rd party cookies by using a privacy enhancement platform such as [optout.aboutads.info](http://optout.aboutads.info) or [youronlinechoices.com](http://youronlinechoices.com). For more information about cookies, visit [allaboutcookies.org](http://allaboutcookies.org).

We use Google Analytics to measure traffic on our website. Google has their own Privacy Policy which you can review [here](#). If you prefer to opt out of tracking by Google Analytics, visit the Google Analytics opt-out page.

### Amendments

Please note that this privacy policy is subject to change from time to time. It was last reviewed in May 2018 and will be updated again when the Privacy and Electronic Communications Regulation 2003 is updated, or there are further changes to The General Data Protection Regulation.