

Privacy Policy for Hawthorne Health

Introduction

Protecting your privacy is very important to us. We're telling you about our privacy policy so you know what information we collect, why we collect it, what we do with it, and your rights with respect to your information. This privacy notice is for HawthorneHealth.com and other HawthorneHealth.com subdomains such as hq.HawthorneHealth.com ("Sites") and the personalized patient follow-ups we perform for clinical trials, studies, or programs ("Services"). "Personal information" is information, or a combination of pieces of information, that could reasonably allow you to be identified, including information defined as "personal data" and governed by the EU General Data Protection Regulation 2016/679, "protected health information" as defined by the Health Insurance Portability and Accountability Act of 1996, and "personally identifiable information" that can be used to identify you directly or when combined with other information. Personal Information may include, but is not limited to, information such as your name, email address, date of birth, home address, health status, or the IP address of your computer.

Types of information we collect

Personal information, including your health status, will be collected when data is collected by Hawthorne Health as part of your participation in a clinical trial, study, or program. We may collect the following types of information that you provide voluntarily with consent:

- Contact Information – including your name, email address, phone number, and/or home address
- Demographic Information – including your date of birth, gender, ethnicity, or medical record number
- Professional Details – such as your occupation or employer name
- Health Status – including medical history, symptoms, and medications that you might be taking
- Diagnostic Measurements – such as heart rate, blood pressure, and other vitals
- Laboratory Results – including results from blood draws

At Hawthorne Health, including its related parties and services partners, we're creating a network of healthcare professionals (called Heroes) who are dedicated to high-quality, personalized patient follow-up for clinical trials, studies, and programs. When you apply to become a Hero, we collect information including your first and last name, your email address, your resume, your responses to several questions, and credential information. When you request information via our website or by sending us an email, we collect information including your name, email address or phone number. Certain information about your visit can be collected when you browse websites. When you browse our sites, we may collect the following types of information about your visit, including:

- IP address (a number that is automatically assigned to a device connected to the Web)

- Date and time of your visit
- Pages you visited, time spent on each page,
- Address of the website that connected you to our website
- Device type (desktop computer, tablet, or type of mobile device)
- Operating system, browser type, language, and screen resolution
- General location data
- User events (e.g., clicking a button)

How we use your information

Performing Services

We use the information we collect for the purposes of conducting the clinical trial, study, or program, generating reports, and to provide updates to the sponsors of the clinical trial, study, or program. Our Heroes collect information when they meet with you in person, using paper and electronic forms, or when you complete information forms and surveys electronically.

Processing Job Applications

We use the application information you provide to determine your eligibility for becoming a Hero and communication with you about your application. We also use your information with our CVO (Credentials Verification Organization) to conduct primary source verification and background checks. Business operations: We use personal information to monitor the stability of our services, operate and manage our business, and fulfill our contracts with our clients.

Service Improvements

We analyze usage information, including site analytics, to optimize site content, continually improve our services and user experience.

Communication

We use personal information to respond to your requests, to contact you, and to communicate with our clients about your status in the clinical trial, study, or program.

Legal Exception

We may use your personal information to exercise or protect our legal rights, or the rights of you or a third party, where it is necessary to do so; for example, to detect, prevent, and respond to a subpoena, intellectual property infringement claims, violations of law, or to ensure your safety or the safety of others.

Consent

We will rely on your explicit consent, including when we collect your health information, if we use your information for marketing purposes, and where otherwise required by law.

Performance of a Contract

We will process any of your personal information identified in this policy as necessary to perform our contractual obligations with our customers or suppliers.

Complying With Legal Obligations

We may process your personal information to carry out fraud prevention checks or comply with other legal or regulatory requirements, such as those related to information security or consumer transaction law, when required by law.

Legitimate Interests

Any personal information not processed under the other bases identified in this section will be processed in furtherance of our legitimate interests. We have legitimate interests in providing and maintaining our Services, responding to your communications, improving and customizing our Services, exercising or protecting the rights of Hawthorne Health, you, or a third party, and operating our business effectively. Where we rely on legitimate interests to process your personal information, we will balance our need to process that information with any risks such processing poses to your rights and freedoms.

How we share your information

We will not disclose your Personal Information to any third party except as follows:

Vendors and Suppliers

We may disclose your Personal Information to third parties who provide services on our behalf, such as providing data hosting services, providing clinical trial recruiting and screening, background checks, scheduling, and data analytics. Some of these third parties may be located outside of the United States. All such providers are required to follow confidentiality and security obligations consistent with this Privacy Policy. We enter into confidentiality agreements and data protection agreements with such providers which require them to use the Personal Information they receive only to perform services for us.

Law Enforcement

Subject to applicable law, we may disclose your Personal Information to any law enforcement, judicial authority, or governmental or regulatory authority, to the extent required by law or if in our reasonable discretion disclosure is necessary to enforce or protect our legal rights, to protect you, or to protect others.

Reorganization

In the event of a reorganization, merger, acquisition, asset sale or similar transaction, we may transfer any and all Personal Information we collect to the relevant third party involved in the transaction, with your consent if and as required under applicable privacy laws.

Prior Consent and Authorization

We may otherwise disclose your Personal Information when we have your prior consent to share the information. In such cases, we will have written contracts in place with the third parties requiring them to comply with terms of confidentiality similar to the applicable terms of this Privacy Policy as well as all applicable statutes, regulations and laws pertaining to the protection of such Personal Information.

Aggregate and De-Identified Information

Once data is de-identified and/or anonymized it is no longer Personal Information and we may share such information with third parties where permitted by applicable law.

Your rights and information updates

You have the right to review, amend, or correct your Personal Information held in our databases. Subject to certain exceptions, you have the following rights:

- To request a copy of your Personal Information
- To have us correct or amend any inaccurate Personal Information

- To request that we erase Personal Information
- To request that we restrict the processing of your Personal Information
- To object to the processing of your Personal Information
- To send us a complaint regarding our handling of your Personal Information

To exercise these rights, please contact us by sending an email to info@hawthornehealth.com with a clear description of your request. We will respond to your request as soon as reasonably practicable and always under the timeframes set forth by applicable laws. You may have additional statutory rights under applicable regional law. If you are in the European Economic Area (“EEA”) you also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws.

How we use cookies and other technologies

Cookies

When you visit a website, its server may generate a piece of text known as a “cookie” to place on your device. The cookie, which is unique to your browser, allows the server to “remember” specific information about your visit while you are connected and improve your website experience. There are two types of cookies, single session (temporary), and multi-session (persistent). Single session cookies last only as long as your Web browser is open. Once you close your browser, the session cookie disappears. Persistent cookies are stored on your device for longer periods. Both types of cookies create an ID that is unique to your device.

Session Cookies

We use session cookies for technical purposes such as to allow better navigation through our site. These cookies let our server know that you are continuing a visit to our site.

Persistent Cookies

We use persistent cookies to understand the differences between new and returning visitors to our websites. Persistent cookies remain on your device between visits to our site until they expire or are removed by the user. We do not use persistent cookies to collect personally identifiable information. Hawthorne Health does not identify a user by using such technologies.

Hawthorne Health also uses the following technologies on our websites:

Website Log Files

Used as an analysis tool and to tell how visitors use our sites, how often they return, and how they navigate through the sites. Hawthorne Health is committed to protecting the user and Personal Information entrusted to us. We have implemented technical and organizational security measures to protect the security and integrity of your Personal Information in accordance with this Privacy Policy and applicable law. Such measures include restricting access to Personal Data on a “need-to-know” basis and an Information Security Program aligned with ISO 27001 and 27002. We secure information using industry standard administrative, physical, and technical safeguards including encryption of information that is stored and transmitted. While we endeavor to always protect our systems, sites, operations and information against unauthorized access, use, modification and disclosure, it is important for you to know that, despite using these current industry-recommended practices, we cannot guarantee against breaches in security.

Retention of Your Data

Hawthorne Health will keep data collected long enough to achieve the specified objective for which they were collected. Once the specified objective is achieved, the data may be erased or destroyed. We store your Personal Information for as long as required by the clinical trial, study, or program, or as necessary to comply with our contractual and legal obligations, resolve disputes, or enforce our agreements to the extent permitted by law. If you would like your Personal Information permanently removed from our database, please contact us at privacy@hawthornehealth.com. Subject to applicable law, clinical trial, study, or program requirements, our instructions from the applicable sponsor, and necessary record retention requirements, your identifying Personal Information shall be deleted from our records.

The Sites may contain links to other websites. We link to other websites solely for your convenience and education. When you follow a link to an external site, you are leaving our website and are subject to the external site's privacy and security policies. Hawthorne Health is not responsible for the contents of external web pages, and a link to a page does not constitute an endorsement. Hawthorne Health leverages a variety of technologies and social media services to communicate and interact with the public. These third-party websites and applications include clinical trial recruiting and screening, social networking and media sites and, open-source software communities, and more. Your activity on the third-party websites that our website links to (such as Facebook or Twitter) is governed by the security and privacy policies of those sites. You should review the privacy policies of all websites before using them so that you understand how your information may be used. You should also adjust privacy settings on your account on any third-party website to match your preferences. These tools collect basic site usage information such as: how many visits our website receives, the pages visited by users, time spent on the site, the number of return visits to the site, the approximate location of the device used to access the site, types of devices used, etc. This information is then used to maintain the website including: monitoring site stability, measuring site traffic, optimizing site content, and improving the user experience.

Cross-border data transfers

Hawthorne Health and its servers are located in the United States and are subject to the applicable state and federal laws of the United States. When you access or use our Sites or receive our Services, you consent to the use and disclosure of information in accordance with this Privacy Policy and are subject to such laws. We transfer your personal information subject to appropriate safeguards as permitted under the applicable data protection laws. We take all necessary measures to ensure that transfers of your Personal Information out of the United States or EEA are adequately protected as required by applicable data protection law. For such transfers, we rely on legal transfer mechanisms such as Explicit Consent, Binding Corporate Rules, Standard Contractual Clauses approved by the European Commission, or compliance with other applicable laws.

Text Messaging

We may use the information you share with us to contact you through text messaging. Text messaging is an optional service and will only be used when you provide consent to receive text messages. By consenting to receive text messages, you also consent to the use of an electronic

record to document your agreement. Text messaging will be used to transmit messages to you and facilitate communication regarding our services. With respect to text messaging, we may share information with platform providers, wireless carriers, and other vendors who assist in delivering mobile messages. Mobile information will not be shared with third parties or affiliates for marketing or promotional purposes. Text messaging opt-in data, consent information, and related message logs will not be shared with third parties except as necessary to provide our services or as otherwise permitted herein or by law. Nonetheless, we reserve the right to disclose information as necessary to satisfy any law, regulation, or governmental request, to avoid liability, or to protect our rights or property. This text message provision applies only to the use of text messaging and is not intended to otherwise modify the terms of this Privacy Policy, which continue to apply in all other contexts.

Your participation in text messaging is voluntary and is not a condition of receiving our services. Text messages may not be fully secure, and we encourage you to limit the sensitive information in any text message you send to us. Text messages will generally relate to scheduling, reminders, coordination of study-related activities, or other operational communications.

Costs of Text Messages

We do not charge you for the messages you send or receive through text messaging. Message and data rates may apply depending on your wireless plan or provider.

Frequency of Text Messages

Text messaging is intended for person-to-person communication between you and our employees, staff, or other approved vendors and personnel. Message frequency will vary based on your interactions with us and the needs of your participation in our services.

Opting Out of Text Messages

If you no longer wish to receive text messages, reply to any message with STOP, QUIT, END, REVOKE, OPT OUT, CANCEL, or UNSUBSCRIBE. Because text messaging is a person-to-person communication, opt-out requests apply only to the specific phone number and conversation in which the request is sent. After unsubscribing, we may send you a confirmation message.

Contact Us

For support with respect to text messaging issues, contact us at info@hawthornehealth.com

Changes or updates

Hawthorne Health may modify or amend this Privacy Policy from time to time. If we make any material changes in the way in which Personal Information is collected, used or transferred, this Privacy Policy will be revised to reflect such changes. We will post the updated Privacy Policy and ask for your consent if legally required.