

This is the privacy policy of Xler8tr, on behalf of itself, its affiliates and subsidiaries (**Xler8tr**).

Xler8tr respects your privacy and is committed to ensuring that your personal information is used in accordance with current data protection legislation.

This policy is structured in the following manner to aid your understanding:

- What information do we hold on you?
- How is your data collected?
- How do we use your information?
- Who do we share your information with?
- Information on transfers outside the EEA
- How long do we retain your information?
- What are your rights in relation to your information?
- Contact point in relation to this policy

For the purposes of Personal Data processing Xler8tr identifies the following Data Subject categories:

- Medical Research Individual (**Individual**) – the subjects of our research.
- Medical Research Project or Institution (**Project**) – the subjects of our search
- Subscriber to Xler8tr Services, both existing and former (**Subscriber**) – you have requested to receive a regular Xler8tr publication, or you access one of our free, or paid, research products or feeds online.

We have therefore split this privacy notice into those three categories for clarity and readability.

You may belong to more than one category.

## Individuals

### 1 What information do we hold on you?

We collect your name, role, firm or Institution name, email address, LinkedIn profile URL and business address.

### 2 How is your data collected?

Our researchers obtain relevant information from direct interactions or publicly available sources such as company corporate websites, LinkedIn, regulatory filings and news alerts. If you have attended an event organised by Xler8tr we will have collected your name, firm name, business address and other contact details. This may also apply where Xler8tr co-sponsors an event.

### 3 How do we use your information?

*Processing for the purpose of providing services:*

We process your data, relying on the "legitimate interest ground". Xler8tr's legitimate business interest, and purpose of our processing of your data, is researching the key current and historical financing, performance, research and investment trends in the healthcare industry and to provide data and information on the firms active in this industry. This includes the provision of company and business professional contact information such as name, role, business address, phone number and email address. Such information will be displayed in our Subscriber products.

### 4 Who do we share your information with?

We process your data using cloud hosting providers in the EU and owned and operated services. We will share your contact details with Subscribers.

Our Subscribers include investors, fund managers, service providers, research institutions, firms and advisors in the healthcare industry.

## Projects

### **5 What information do we hold on you?**

We collect your name, role, firm name, email address, LinkedIn profile URL and business address.

When you connect to our services, we log your IP address.

If you visit our offices, we may capture CCTV images.

### **6 How is your data collected?**

If your firm has expressed an interest in our product(s), our sales team will collect your name, firm name, business address and other contact details.

If your firm is a participant healthcare research, then you or your colleagues may have either verified or submitted your name, firm name, business address and other contact details to us.

If you visit our offices, we may capture CCTV images.

### **7 How do we use your information?**

*Processing for the purpose of providing services:*

We process your data, relying on the "legitimate interest ground". Xler8tr's legitimate business interest, and purpose of our processing of your data, is researching the key current and historical financing, performance, research and investment trends in the healthcare industry and to provide data and information on the firms active in this industry. This includes the provision of company and business professional contact information such as name, role, business address, phone number and email address. Such information will be displayed in our Subscriber products.

In order to provide our contracted services we will process your personal data to enable the creation of credentials to access our product.

Logs of access recorded by IP address are used in the process of potential system abuse and crime detection. This access is anonymized unless it is related to a sign-in by a Contributor userID.

CCTV images are used in the process of crime detection.

### **8 Who do we share your information with?**

We process your data using cloud hosting providers in the EU. We will share your contact details with Subscribers and we will share your information with third parties who conduct surveys to help enhance our products.

Our Subscribers include investors, fund managers, service providers, research institutions, firms and advisors in the healthcare industry.

## Subscribers

### 9 What information do we hold on you?

We collect your name, role, firm name, email address, LinkedIn profile URL and business address.

When you connect to our services we log your IP address and the pages you have viewed.

If you visit our offices we may capture CCTV images.

### 10 How is your data collected?

If your firm has expressed an interest in our product(s), our sales team will collect your name, firm name, business address and other contact details.

Our researchers obtain relevant information from direct interactions or publicly available sources such as company corporate websites, LinkedIn, regulatory filings and news alerts. If you have bought a product from us, we will collect your name, firm name, business address and other contact details.

If you have requested one of our free products from us, we will collect your name, firm name, business address and other contact details.

If you have used our services, our systems will collect your IP address for services you have used and pages you have visited. We will also collect details on the device you used to connect, such as operating system, geographic location, browser type and language, access times and referring website addresses.

If you visit our offices we may capture CCTV images.

### 11 How do we use your information?

*Processing for the purpose of providing services:*

We process your data, relying on the "legitimate interest ground". Xler8tr's legitimate business interest, and purpose of our processing of your data, is researching the key current and historical financing, performance, research and investment trends in the healthcare industry and to provide data and information on the firms active in this industry. This includes the provision of company and business professional contact information such as name, role, business address, phone number and email address. Such information will be displayed in our Subscriber products subject to the role being relevant and the information is verified through publicly available sources.

In order to provide our contracted services we will process your personal data to enable the creation of credentials to access our product.

Logs of access recorded by IP address are used in the process of potential system abuse and crime detection. This access is anonymized unless it is related to a sign-in by a Subscriber userID.

Logs of page views and interaction with our web product are maintained to help us to provide you with a more personalized user experience in relation to the provision of services to you.

We will use business contact details to process contractual payments.

CCTV images are used in the process of crime detection.

*Processing for the purpose of analyzing user data:*

When you receive newsletters or promotional email from Xler8tr, we will use personalized unique links or similar technologies to determine whether the email has been opened and which links you click. This enables us to provide you with email communications or other information that are more targeted to your needs. We will rely on our legitimate interests to do this, meaning the provision of electronic direct marketing of our data, services and products, unless legislation requires us to obtain your consent, in which case we will request this from you.

## 12 Who do we share your information with?

We process your data using cloud hosting providers in the EU. We will share your contact details with other Subscribers subject to the role being relevant and the information is verified through publicly available sources.

We will also share your information with third parties who conduct surveys to help enhance our products.

We will share your information with partners that provide analytics, user experience and interaction analysis of our web product. This data is pseudonymized, using cookies.

Printed products may be despatched to fulfil the contract with you by a provider in the UK.

We will process online product payment information via EU-based third-party hosted payment pages that are compliant with the Payment Card Industry Data Security Standard.

Any billing arrears are referred to a debt collection agency which has a local presence in all relevant territories.

## Transfers outside the EEA

### 13 Individuals, Projects and Subscribers

Our offices, where operating as separate legal entities outside of the UK, have access to all contact data that we hold. Appropriate data protection is provided by a Model Clauses schedule in the relevant contracts between the legal entities.

Our outsourced research teams in the Philippines, China and India have access to all contact data that we hold. Appropriate data protection is provided by a Model Clauses schedule in the relevant contracts.

Our outsourced finance team have access to all contact data that we hold. Appropriate data protection is provided by a Model Clauses schedule in the relevant contracts.

We partner with companies who analyze how our Subscribers navigate and use our website. These companies operate in the US and appropriate data protection is covered by their EU Privacy Shield certification.

Our Survey partners operate in the US and appropriate data protection is covered by their EU Privacy Shield certification.

Subscribers are globally distributed and have access to visible contact data in our products. Where Subscribers operate outside of a territory that is deemed to have "Adequate" status by the European Commission or are not certified to US/EU Privacy Shield, appropriate data protection is provided by a Model Clauses schedule in the Terms and Conditions of service.

A definition of Adequate status and a list of relevant countries can be found here:

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

Model clauses permit such transfer under Article 46 of the General Data Protection Regulation (the "GDPR"). You can find a link to the model clauses here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

## What are your rights in relation to our use of your information?

You have rights under data protection law in relation to our use of your information, including to:

- a. request access to your information, which you can do by emailing <mailto:dp@xler8tr.com> stating you are submitting a Subject Access Request
- b. update or amend your information if it is inaccurate or incomplete by emailing [dp@xler8tr.com](mailto:dp@xler8tr.com) requesting an update

- c. object to certain uses of your personal data (which includes direct marketing and processing based on legitimate interests and processing for purposes of scientific or historical research and statistics) on grounds relating to your particular situation by [emailing dp@xler8tr.com](mailto:dp@xler8tr.com).
- d. request the deletion of your information, or restrict its use, in certain circumstances (for example you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected, unless certain exceptions apply) by emailing [dp@xler8tr.com](mailto:dp@xler8tr.com);
- e. withdraw any consents you have provided in respect of our use of your information either by clicking unsubscribe links in emails or emailing [dp@xler8tr.com](mailto:dp@xler8tr.com);
- f. request the return of information you have provided to us, to use for your own purposes (often called your right to data portability) where the processing is based on your consent or for the performance of a contract, and the processing is carried out by automated means;
- g. lodge a complaint with the Information Commissioner's Office (<https://www.ico.org.uk/global/contact-us/email/>) [or other relevant supervisory authority].

We may need to ask you for further information and identification to help us to comply with this request. More information about these rights can be found at <https://ico.org.uk/for-the-public/>. If you have any questions about these rights, or you would like to exercise any of them, please contact us at [dp@xler8tr.com](mailto:dp@xler8tr.com).

## How long do we retain your data?

Contact details of **Individuals**, **Projects** and **Subscribers** are stored for varying lengths depending on the nature and purpose for which it was collected. Xler8tr will review your personal data periodically (usually annually) to ensure it is still necessary to be retained for the purpose for which it was collected.

Page View data meaning statistics as to which firm has accessed your firm profile on our web product and how often is kept for the lifetime of the product so that we can understand changes to usage patterns over time.

System access and event logs are kept online for 28 days.

Billing data is kept for the lifetime of our contract with you and then ongoing for seven years to comply with tax legislation.

Backups of our products are retained for a year. However, we have processes to ensure if a restore is required Subject Rights are maintained.

CCTV data in the London office is retained online for a year.

## How to contact us

If you have any questions regarding this policy, please email [dp@xler8tr.com](mailto:dp@xler8tr.com).

## Changes to this policy

We keep this privacy notice under regular review and we will place any updates on this webpage. We will inform you of any material changes to the privacy notice. This privacy notice was last updated on 2nd May 2018.