

## **PharmaNet Development Group Privacy Policy**

### **Data Privacy at PharmaNet Development Group (PDG)**

At PharmaNet Development Group, ("PDG") we are strongly committed to protecting your privacy. You can navigate the majority of our site without giving us any personal information about yourself. However, we may track the technical information (see "cookies" below) provided to us by your browsing the site to improve the navigation, content and design of our website. You may voluntarily provide additional information about yourself to enable us to provide the information or services you are requesting.

Your privacy is important to us. To protect your privacy, we provide this Policy describing what information we collect about you, how we intend to use your information, what choices you have regarding how your information is used, how we protect it, how you can access your information to correct it, and how to contact us regarding your information.

### **PDG Website Privacy Statement**

This Privacy Statement applies to all visitors who register on the PDG website, <http://www.pharmanet.com>.

### **The Information We Collect**

The personal information we collect when you register on our website may be provided by you for several different reasons which are described below:

1. You can register to receive information on an automated, "alert" basis. The type of information that you can register to receive on an automated basis includes general information about PDG, such as:

- Press releases
- News and presentations
- SEC reports
- Investor Relations calendar updates
- Annual Report / Other financials
- Video / Audio archives from our Broadcast Center

The personal information collected when you register to receive information on an automated basis is your email address. Each time you receive an automated email alert, you have the option of canceling your registration and removing your email from the database by simply clicking on the unsubscribe link at the bottom of each email alert message.

2. You may opt to provide us information about yourself if you are interested in an employment opportunity at PDG. The information requested from you will be based on your area of interest.

3. You can register to receive customized information. This information is generally collected on "Contact Us" forms where you can ask questions or request information. The personal information you provide on these forms may include your name, title, company name, address, contact telephone numbers, and email address. Physicians who may be interested in participating in clinical trials may also be asked to provide their areas of expertise and their experience.

4. You can choose to register to receive access to webcasts, periodic newsletters, or information on a specific PDG product or service. Generally, the personal information collected when you register to receive this type of information is your name, company, affiliation, and email address. This information is collected for qualification and aggregate measurement purposes only.

### **The Way We Use Information**

We store the information you provide about yourself in a secure database in order to provide you with the information, products, and/or services you request. The information you provide us about yourself will be shared with PDG employees to the extent necessary to accommodate your request. You must consent for us to share your identifiable information with third parties.

For example, if you provide your name, mailing address, telephone and email address and request more information about PDG's services this information will be shared with appropriate PDG personnel to fulfill your request. This information will not be shared with any outside third parties without your consent.

We use non-identifying and aggregate information about the use of our website to improve the navigation, content, and design of our site. This information may include, for example, the most and least requested pages and the number of users from the U.S. and other countries, among other things.

Finally, unless otherwise excepted below, we would not use your personally identifiable information provided to us online for purposes other than those you requested without also providing you an opportunity to agree or otherwise limit such unrelated purposes.

### **Exceptions**

Except as described above, we will not otherwise use or disclose any of your personally identifiable information, except to the extent reasonably necessary: (i) to correct technical problems and malfunctions and to technically process your information; (ii) to protect the security and integrity of our website; (iii) to protect our rights and property and the rights and property of others; (iv) to take precautions against liability; (v) to the extent required by law or to respond to judicial process; or (vii) to the extent permitted under other provisions of law, to provide information to law enforcement agencies or for an investigation on a matter related to public safety, as applicable.

### **Our Commitment To Data Security**

The personal information you provide is stored in a secure electronic database that has access limited to only those who need to know your information in order to address your requests. PDG also has a corporate policy in place that requires all personnel not to disclose personal information to any third party that is not entitled to have that information.

### **Cookies**

A cookie is a piece of data stored on the hard drive of your computer. Usage of a cookie is in no way linked to any personally identifiable information while on our site. PDG uses cookies on our website in order (a) to allow site visitors to personalize their experience by accessing information, products, and services relevant to their areas of interest, (b) to track a user session within a subscribed product, and (c) to allow site visitors to vote only once in periodic opinion polls.

We receive IP addresses in the normal course of the operation of our website. An IP address is a number assigned to you by your Internet service provider so you can access the Internet. Although we do receive IP addresses, we do not use them to identify you personally or disclose them to others.

### **Our Commitment To Children's Privacy**

Protecting the privacy of the very young is especially important. No part of our website is structured to attract anyone under 13.

### **How You Can Access Or Correct Your Information**

You may update or remove the information you provided to us by contacting us - see [Contact Us](#). Due to the regulations associated with clinical trial data, you may not have access to these data until the trial is complete and the results of the trial have been reported.

### **Links To Other Websites**

Our website may contain links to other websites. You should carefully review the privacy policies and practices of other Web sites, as we cannot control or be responsible for their privacy practices.

### **EU – US Safe Harbor Privacy Statement**

**This section of the Policy Statement does not apply to PDG employee data or to individuals who are applying to become employees of PDG.** This Policy Statement does apply to all other personal information received by PDG in the United States from the European Union. The privacy principles included in this statement are based on the Safe Harbor Privacy Principles that can be found on the U.S. Department of Commerce website, [http://www.export.gov/safeharbor/sh\\_overview.html](http://www.export.gov/safeharbor/sh_overview.html).

### **Notice On How We Will Use Your Information**

When PDG collects personal information directly from individuals, they will be informed about the purpose for which the information is collected and if there is an intent to provide that information to a third party. Individuals will also be notified if there is an intent to use the information for purposes other than those originally disclosed. This notice will be provided to individuals in a clear and conspicuous language before such personal information will be used for purposes other than that for which it was originally collected or processed.

### **Your Privacy Choices**

PDG will offer individuals the opportunity to choose (opt out) whether their personal information is to be disclosed to a third party or is to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the individual.

For sensitive information, PDG will give individuals the opportunity for an explicit affirmative choice (opt in) to have their information disclosed to a third party or used for purpose(s) other than those for which it was originally collected or subsequently authorized by the individual.

Sensitive information is personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information specifying the sexual orientation of the individual.

### **Transferring your information to a third party**

PDG may provide your information to third parties such as clients for whom we work, affiliates, vendors, or to regulatory agencies; but your information will always be protected under the terms of this Privacy Policy. This will be achieved by first ascertaining that the third party will provide the same level of privacy protection as described in this Privacy Policy. If it becomes known that a third party organization which has received personal information is using or disclosing it a manner contrary to this Policy, PDG will take reasonable steps to prevent or stop this use or disclosure.

### **How your information is secured**

PDG employs reasonable precautions to prevent your personal information from loss, misuse, unauthorized access, disclosure, alteration or destruction. We also take reasonable steps to ensure your information is reliable for its intended use, accurate, complete and current. This is achieved by storing your information in a secure electronic database that is component of a computer system that has physical, electronic and supervisory procedures in place to ensure compliance with all electronic records regulations.

### **How this Policy is enforced**

PDG's Privacy Officer in conjunction with its Corporate Quality Assurance Group has put into place self assessment procedures to ensure compliance with this Policy. These procedures will be exercised on a random basis, and any employee who is found to intentionally violate this Policy will be subject to disciplinary action up to and including termination of employment.

**How your dispute or complaint may be resolved**

Any questions, concerns or complaints regarding the use of your personal information should be directed to the PDG Privacy Officer using the contact information presented below. PDG will attempt to resolve any dispute or complaint relating to the misuse or improper disclosure of personal information by investigating it in accordance with the principles contained in this Policy. Appropriate corrective and preventive action will be implemented and follow-up on such action will be conducted to verify that the expressed concern or complaint has been resolved.

**How to contact PDG regarding Privacy issues**

Questions, concerns, or complaints regarding this Policy or the handling of your personal information should be submitted to:

Privacy Officer  
PharmaNet Development Group  
504 Carnegie Center  
Princeton, NJ 08540  
USA

You may also contact the PDG Privacy Officer at the following e-mail address: [privacy@pharmanet.com](mailto:privacy@pharmanet.com)

**Changes to this Privacy Policy**

This policy may be amended from time to time to ensure consistency and compliance with changes in the Safe Harbor Principles or in statutory requirements. Changes to this policy will be posted on the PDG website and we recommend that you review this Policy to ensure you are aware of any changes made to it.

**Effective Date**

This Privacy Policy became effective on: 01 May 2007 and was last updated on 01 October 2007.