

Privacy Policy

Pharmaspectra US, LLC (USA) (“**we**”/“**us**”/“**our**”) recognizes that the privacy and personal information of the data subject (“**you**”/“**your**”) is extremely important. We promise to protect the privacy of your personal information by complying with the Japanese Act on the Protection of Personal Information (“**Act**”), the governmental ordinance of the Act, the rules of the Act, and guidelines or other applicable laws relating to the protection of privacy, etc. (“**Laws**”). We will maintain transparency about how we collect, use, store, transfer and share information about you. This privacy policy (“**Policy**”) explains how we may use the information we collect about you. Terms used in this Policy are defined by laws unless otherwise defined in this Policy.

Our affiliates, Pharmaspectra Group Ltd (UK) and Pharmaspectra Informatics PVT LTD (India), shall be referred to herein together as the “**Group**.”

1. Scope of this Policy

This Policy applies to the handling of personal information that we collect about you.

2. Publication of this Policy

We will publish this Policy in an appropriate manner including by posting it on an easy-to-see area of our website.

3. Categories of Personal Information We Collect

We collect your Personal Information for the provision of services or otherwise in relation to the operation of our business. The concrete contents and the purposes of use are as follows.

Public Information: We collect information you manifestly made public through open sources, from you when you provide such information to us, and from third parties we understand have the legal right to share such information with us. The information is related to articles or other information you have published, authored or otherwise made public in connection with your field of work/expertise and/or research to which you were connected. This information may include your name, your employer/professional affiliation, additional professional biographical data (i.e., professional engagements, other digital and analogue publications, and certifications/awards, etc.), and any contact information in connection therewith. For example, we may collect such information as is appended to an article you published in your field of expertise and/or related to research to which you were connected.

Information on Communication: When you contact us for a certain reason and communication starts, we may collect information about you based on the contents of the communication.

Information on Access: In your method of access and relation to our website, we collect such information in the form of cookies, traffic analysis, etc.

Other Information: In addition to the above, we will collect information that you provide to us.

We do *not* collect Special Care-Required Personal Information.

4. Purpose of Use of Personal Information Handled by Us

Personal information handled by us is used for the following purposes.

Third Party Provision: We will provide personal data to a third party only in compliance with Laws and in the event that the requirements under the laws are met.

Communication with You: We use the information to contact you, to manage our interactions with you, to allow our customers and clients to potentially invite you to participate in specific engagements or events related to your field(s) of expertise and/or research to which you were connected (and manage such engagements). We may provide your personal information which you have made public, or had made public on your behalf, to third parties so such third parties may contact you concerning your field of work/area of expertise and/or research or articles you have published.

Others: In addition to the purposes above, we handle your Personal Information for (1) compliance with applicable laws, (2) handling of inquiries and requests from governmental agencies and public organizations, (3) compliance with effective legal actions, (4) protection of rights, assets, privacy, safety and other interests of the Group, employees and other people in general, (5) security measures of the website, (6) dealing with emergencies, (7) fraud and crime prevention, (8) any other legitimate purposes incidental or related to the foregoing, (9) internal or external audits, (10) updating our records, (11) internal analysis and business management purposes, (12) any other purpose for which valid consent is obtained, and (13) any other purposes the handling of which is allowed according to the applicable laws and regulations.

5. Deletion of Personal Information

We strive to keep personal data accurate and up to date within the scope necessary to achieve the purpose of utilization, and to delete it without delay when such utilization is no longer necessary.

6. Data received based on the Adequacy Decision by EU and UK

When we receive personal data based on the adequacy decision by EU and UK, we comply with the obligations added by the Laws including but not limited to the “Supplementary Rules under the Act on the Protection of Personal Information for the Handling of Personal Data Transferred from the EU and United Kingdom based on an Adequacy Decision.”

7. Provision of Personal Data to a Third Party in a Foreign Country

In order to realize the international transfer of your personal data in compliance with applicable laws and regulations, we execute agreements with other foreign entities where the personal data are jointly utilized within the Group and where the handling of the personal data is consigned to third parties (including vendors and contractors, etc.) in foreign countries (including the UK and India) ensuring that the level of protection of the personal data is the same as or higher than the level required by the Act.

The details of the joint utilization are as follows:

Categories of the jointly utilized personal data: public information, communication information, access information, and other information provided to us by the data subject

The scope of a jointly utilizing person: The Group

The utilization purpose for the utilizing person: communication with the data subject and other purposes indicated in “Others” in Section 4 above.

The name or appellation of a person responsible for controlling the said personal data:

Attention: Privacy Officer (privacy@pharmaspectra.com)
Pharmaspectra US, LLC
210 Main Street, 2nd Floor
Madison, New Jersey 07940

USA

8. Third-Party Provision by Opt-out

We will provide personal data (excluding Special Care-Required Personal Information) to a third party without obtaining your prior consent as follows. Provided, however, that we shall, at your request in accordance with the method as set forth in (5) below, cease providing such personal data which can identify you to a third party as set forth in (4) below.

(1) Our Utilization Purposes include the Third-Party Provision (by Opt-out)

(a) Purpose of utilization: We provide personal data to a third party to allow the third party (our customers and clients) to potentially invite the data subject to participate in specific engagements or events related to the field(s) of expertise and/or research and/or research to which the data subjects were connected (and manage such engagements)

(b) Information recipients: Pharmaceutical and healthcare industry companies.

(c) Information sources: Internet, papers, magazines and other public information.

(d) Method of obtaining information: Browse various types of public information such as the Internet, papers, magazines and other public information.

(e) Information processing methods: We make a good faith effort to keep the personal data accurate by accurately obtaining this personal data from the data subject and/or the applicable public source, and matching it with any existing personal data of the data subject which we have or which we receive, including any such personal data provided directly or indirectly from the data subject.

(f) Proper acquisition of information: In accordance with the Guidelines for the Act, personal data provided by a third party is obtained by an appropriate method after checking the process of acquisition by the third party.

(2) Categories of Personal Data to be Provided to a Third Party

Name, title, position, company/organization name, date of birth, gender, nationality, e-mail address, home address, telephone number, fax number, country of residence, name of thesis, book name, essay summary, book summary, employer/professional affiliation, additional professional biographical data (i.e., professional engagements, other analogue or digital publications, and certifications/awards, etc.), and any contact information in connection therewith.

(3) Methods of Provision to Third Parties

By electromagnetic method thorough the online platform or the third-party's (clients') own CRM system.

(4) We will cease the provision to a third party at the request of the data subject.

(5) Method of Accepting Requests from the Data Subject

If you wish to suspend the provision of information to a third party, please contact us at the following e-mail address: privacy@pharmaspectra.com

For Japanese people, you may contact h.hirayama@pharmaspectra.com to receive the request in Japanese.

9. Cookies and Tracking Notices

We use cookies to make your usage of our website easy and enhance your service experience. When you visit one of our websites, our servers send a cookie to your computer or device. Standing alone, cookies do not personally identify you but they recognize your web browser. Therefore, when you already previously identified yourself to us, and the cookies are sent, and the same browser accesses our website, we may be able to identify the fact that such access is made by you. However, if you have never disclosed your information to us, we cannot identify you.

Further information about cookies and other similar technology and how they work is available at:

<https://www.pharmaspectra.com/cookie-policy>

10. Dealing with the Situation when the Leaking of Personal Data, etc., Occurs

We deal with the situation when the leaking of personal data, etc., occurs based on the guideline, “Dealing with the Situation when the Leaking of Personal Data, etc., Occurs,” which includes (1) internal report and prevention of further damages, (2) investigation of the facts and clarification of the cause, (3) identification of victims, (4) contemplation of the measures to prevent the event from occurring again, (5) notification to victims, (6) disclosure of the facts and the measures to prevent the event from occurring again, and (7) notification to the relevant authorities.

11. When You are a Child under the Age of 18

We recognize the importance of children’s safety and privacy. The website is not designed to attract children, and is not intended for use by any children under the age of 18. We do not utilize personal data about children under the age of 18. If you are under the age of 18, you do not have permission to use this website.

12. Disclosure, etc., of Your Personal Information

We comply with your requests on the disclosure, etc., of your personal information as provided in the Act. Please send a written request to the address or email address of the Contact Point for Questions and Complaints as follows. We request that a copy of your Official ID Card be sent to us to identify you.

13. Contact Information for Questions and Complaints

Please use the following contact information for questions and complaints regarding this Policy or your Personal Information:

Attention: Privacy Officer (privacy@pharmaspectra.com)
Pharmaspectra US, LLC
210 Main Street, 2nd Floor
Madison, New Jersey 07940
USA

14. Change of this Policy

We may change this Policy from time to time by publishing a new policy on our website.

Effective date: June 30, 2021