

Privacy policy of Trialing Health, S.L.

In accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter, "GDPR"), with the provisions of the Organic Law 3/2018 of December 5, 2018, on the Protection of Personal Data and guarantee of digital rights (hereinafter, "LOPD") as well as the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA 2018"), we proceed to inform you:

1. TRIALING data.

- Contact details of the data controller:
 - Company name: TRIALING HEALTH, S.L.
 - TAX IDENTIFICATION NUMBER: B-06838700.
 - Postal address: Carrer de la Diputació 48, 08015 Barcelona
 - E-mail: rgpd@trialing.org
- Contact details for UK purposes:
 - Company name: TRIALING, LTD. (hereinafter referred to as "TRIALING").
 - UK Company number: 12300224.
 - Postal address: York Eco Business Centre (Office 12) Amy Johnson Way, Clifton Moor, York, England, YO30 4AG.
 - E-mail: rgpd@trialing.org

2. Purpose of personal data processing

The user is informed that personal data obtained from our website <https://www.trialing.org> and our "Trialing" application available for iOS and Android (hereinafter and jointly, the "Platform") will be processed in accordance with the following purposes:

- Technical management of the Platform to publicize TRIALING's services. And to develop and test new products and features, monitor performance indicators such as total number of visitors, traffic and demographic data patterns.

Data collected	Treatment basis
IP address, date and time of access, request content, access status/HTTP status code/volume of data transferred, <i>clickstream</i> , browsing and browsing patterns, browser, language settings,	The basis for processing your personal data derives from the fact that such processing is necessary to make available to you the functionalities of the Platform that you request (art. 6(1)(b) of the GDPR). If your

operating system version of browser software and surface, device type, application version, the numeric user ID of the mobile device, as well as actions you have performed.	<p>data were not processed, you would not be able to access these functionalities.</p> <p>With regard to product development and performance monitoring, the basis for processing is legitimate interest (Art. 6(1)(f) GDPR).</p>
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- Cookies: You can find additional information about why we use cookies and how you can manage them in our [Cookie Policy](#).
- Error tracking and performance monitoring of the Platform: TRIALING sends detected bugs to an external bug tracking tool called Sentry (sentry.io). This allows us to react quickly to bugs that users are encountering without the need for bug reports.

Data collected	Treatment basis
Device model, type, app version, OS, OS rooted, user ID (assigned by sentry), accessibility options enabled on the phone, language, time zone, number of processors, device architecture, battery level, boot time, brand, battery status (charging or not), connection, available space, free memory, app language, device model, orientation, temperature parameters, battery temperature.	The basis for processing is legitimate interest (art. 6(1)(f) GDPR).

- To detect, prevent and combat fraud and other illegal activities.

Data collected	Treatment basis
Those data that are strictly necessary.	The basis for processing your personal data is legitimate interest (art. 6(1)(f) GDPR) or legal obligation if applicable (art. 6(1)(c) GDPR).

- Contact forms: if you contact TRIALING through the contact form on the Platform, we will receive your name and email address, as well as any other information you have included in the message. This data is only transmitted by e-mail and is not stored on the Platform. TRIALING will use this data only for the purpose for which you have entrusted it to us.

Data collected	Treatment basis
Name and surname, e-mail address	<p>The basis for processing your personal data derives from your consent (art. 6(1)(a) of the GDPR).</p> <p>If you do not provide this information, you will not be able to submit this form.</p>

- Manage your registration as a user of the service offered by TRIALING and give you access to the Platform.

Data collected	Treatment basis
E-mail, password, first name, last name, member number, telephone, city of work, hospital, specialty.	<p>The basis for processing your personal data derives from the fact that such processing is necessary to make available to you the functionalities of the Platform that you request (art. 6(1)(b) of the GDPR).</p> <p>If you do not provide such data, you will not have access to the functionality.</p>

- Manage your profile as a user of the aforementioned Platform in the following terms:
 - Use of the search engine: Based on the answers provided through the decision tree (data related to an anonymous case or entered randomly), we provide you with information about those clinical trials that show the greatest affinity with the case provided, and those hospital centers that conduct the studies.
 - Referral request: In case the data entered in the Platform shows any study of interest to the medical professional, he/she will be able to consult the main details of the referred study (start date, estimated end date, phase, sponsor, number of participants, etc.). If he/she believes that participation in the study might be appropriate for a patient, the

professional can use the "Refer" function in the Platform. By clicking on this button, the user accepts that his/her professional email address will be shared with the study directors to facilitate further contact.

After the referral request, the Platform sends internally to Trialing, through the Slack tool, the professional email, name and surname of the user, so that we can perform internally, a correct monitoring of the referral. Likewise, the Platform will generate a tracking code so that the user can anonymously monitor the status of the referred case. By default the status will be "On hold".

The tracking code may be replaced by an alias, but in no case may it be filled in with personal data relating to the patient.

- MDP test request: In case the medical professional is interested in requesting a test in the MDP (Molecular Diagnostic Platform) through the platform, he/she will be able to consult the main details about it offered by the Trialing collaborators who provide this service. In the case of being interested in requesting the test in the MDP for his patient, the medical professional will be able to use the "Request" function enabled in the corresponding tab of the Platform. By clicking on this button, the user accepts that his/her user email will be shared with those responsible for the tests in order to facilitate subsequent contact. The description of the patient's medical history and current disease, as provided by the healthcare professional, will be shared with the user's email, always in an anonymized form, as it should not contain personal data that identifies or could identify a person.
- Following the referral request, the Platform sends Trialing an internal message through the Slack tool, the professional email address, name and surname of the user, so that we can carry out a correct monitoring of the request internally.

Shared data	Treatment basis
First name, surname, medical center, member number, e-mail address.	<p>The basis for the processing is the consent of the data subject (Art. 6.1.a) RGPD).</p> <p>If you do not provide this information, your application will not be processed.</p>

- Study director - medical professional contact: Once the person(s) assigned as clinical trial contact person(s) has received through the Platform an email or SMS with the email address of the healthcare professional making a referral request, he/she/they may contact him/her/them to provide more information about the study or exchange further

considerations about the appropriateness of the trial for a patient. The user accepts that after using the "REFER" function of the Platform, he/she may be contacted by the directors of the clinical study for which he/she requested the referral.

Please note that this phase takes place via means external to TRIALING, and therefore TRIALING does not retain any control over and is not responsible for the information exchanged at this site. Medical professionals are obliged to comply with the applicable laws on professional secrecy and protection of personal data and exempt TRIALING from any liability arising from possible breaches of this site.

- MDP test collaborator contact - medical professional: Once the person(s) assigned as MDP test contact person(s) has received through the Platform an email, with the email of the healthcare professional making an MDP test request, he/she/they may contact him/her/them to provide further information about the MDP test or exchange further considerations about the suitability of the MDP test for a patient. The user accepts that, after using the "REQUEST" function of the Platform, he/she may be contacted by the responsible/collaborators of the MDP test from which he/she requested the referral.

Please note that this phase takes place through means external to TRIALING, so TRIALING retains no control over and is not responsible for the information exchanged. Medical professionals are obliged to comply with the applicable laws on professional secrecy and protection of personal data and exempt TRIALING from any liability arising from possible breaches in this area.

- Follow-up of the acceptance/rejection of the referral: that discussions between medical professionals and clinical trial directors outside of TRIALING conclude in the acceptance by any patient to participate in any medical trial, the status visible next to the case tracking code may change to "Accepted" or "Declined" depending on the outcome of the pre-screening performed at the clinical trial site
- Contact Whatsapp Business: Trialing can use WhatsApp business as an informative communication channel with the users of the service, for its management.

Shared data	Treatment basis
First name, surname, medical center, member number, telephone number, e-mail address.	The basis for the processing is the consent of the data subject (Art. 6.1.a) RGPD).

- Notifications regarding clinical trials published on the platform: In order to show you relevant alerts and updates within our Apps on Android and iOS, we may send you push

notifications or informational emails. The user may disable these notifications by opting-out of emails or by disabling push notifications in their user profile on the platform.

Data used	Treatment basis
Name, surname, e-mail address.	The basis for the processing is legitimate interest (Art. 6.1.f) RGPD).

The personal data obtained through any of the channels of the Platform will be part of the Register of Processing Activities (RAT) owned by TRIALING. This will be updated periodically in accordance with the provisions of the RGPD. The user is informed of the possibility of withdrawing their consent in the event that it has been granted for any specific purpose, without affecting the lawfulness of the preceding processing based on the consent prior to its withdrawal.

For clarification purposes, TRIALING states that no personal data of patients is collected through the Platform, since the information entered by users on the platform for the purpose of locating medical studies does not directly identify them, nor does TRIALING have the means, resources, technology or motivation to establish relationships between such information and identified individuals.

3. Data retention period

TRIALING will retain your personal data for as long as your account is active (i.e. until you opt-out); as necessary to provide you with the services or for the purposes described in this privacy policy or at the time of collection. TRIALING may retain your personal data for as long as necessary to comply with our legal obligations, resolve disputes or as otherwise permitted by law.

When you request cancellation of your account, we will delete or anonymize all of your personal data in accordance with the requirements of applicable law so that it cannot be reconstructed or associated with you.

4. Data recipients

As a general rule, your personal data will not be disclosed to third parties, except for legal obligations or for the defense of our legal interests.

As an exception to the above, they may be recipients of personal data from our Platform:

- The organizations behind our third-party cookies, as can be found in our [Cookie Policy](#).
- [Firebase](#): We use Firebase as a platform for the development of our application.
- [Sentry](#): Our Platform uses Sentry for failure reporting.

- [Slack](#): Our platform uses Slack, as an internal communication tool, so that Trialing can monitor referral requests.
- [Google Analytics](#): Our Platform uses Google Analytics, an analytics service provided by Google Ireland Ltd ("Google"). The Google Analytics settings have been modified by us for the measurement-only function, unless separate consent has been granted for other advertising functions. Google Analytics uses a specific form of cookie, which is stored on your device and enables an analysis of your use of our website/app. The cookies set by Google Analytics for measurement are first-party cookies, which means that the values of the stakeholder cookies will be different for each client (i.e., there is no single Google Analytics cookie ID that is used across all sites that use Google Analytics). Information about your use of this Platform generated by the cookie is generally transmitted to a Google server and stored there.

Google uses this information on our behalf to analyze your use of this Platform in order to compile reports on Platform activities and to provide additional services related to the use of the Platform and the Internet. The IP address transmitted by your device in the context of Google Analytics is not merged with other Google data.

We use Google Analytics to analyze and periodically improve the use of our Platform. We may use the statistics obtained to improve our offer and make it more interesting for you as a user. In addition, we obtain information about the functionality of our Platform (e.g. to detect navigation problems).

In the Google Analytics settings, we ensure that Google receives this data as a processor and is therefore not authorized to use this data for its own purposes.

Transfer to third countries is possible. As an adequate safeguard, we have agreed standard contractual clauses in accordance with Art. 46 of the GDPR.

- The directors of the clinical studies with whom the user (medical professional) decides to share his/her e-mail when using the "DERIVE" function offered by the application.
- Clients/third parties (private companies, pharmaceutical companies, Biotech laboratories) with whom we maintain a collaborative/commercial relationship, offering MDP studies/tests, with whom the user (medical professional) decides to share his/her contact details (email) when using the "REQUEST" function offered by the application.
- Our hosting service provider is [Amazon Web Services \(AWS\)](#), and all information is stored on their servers located in Europe, specifically in Ireland (EU-1-west zone).

In connection with the Platform services, we may share statistical or aggregate data about metrics, *clickstream*, decision trees, general characteristics of referral requests and any other aggregate data about user activity on the Platform.

Additionally, we inform you that, in certain cases, we may provide access to your data to third party companies in their role as data processors to help us properly manage our services. If so, TRIALING will sign a contract under the provisions of Article 28 of the GDPR.

5. International transfers

It is important to note that some of our vendors may be based in the United States, be affiliated with an office in the United States, or process data in the United States. For this reason, the information we collect from you may come to be processed in the United States. Following the judgment in Case C-311/18 (Schrems II Case), the European Union's "adequacy" ruling under Article 41 of the GDPR was overturned, which means that your data may not receive protection in that country equivalent to that which it enjoys under the European General Data Protection Regulation.

In this regard, TRIALING is monitoring the transparency documentation published by the aforementioned companies and is in the process of evaluating the supplementary mechanisms proposed by them. We will make more information available as it is made available by the companies and the relevant supervisory authorities. In the meantime, in order to use these services we rely on derogations for specific situations under Article 49 of the GDPR. In particular, to collect and transfer personal data to the USA we will use: your consent (Art. 49.1.a) or the performance of a contract (49.1.b). We and our agents strive to apply appropriate safeguards to protect the privacy and security of your personal data and to use it only in ways that are consistent with your relationship with us and with the practices described in this Privacy Policy.

6. Rights of interested parties

If TRIALING processes your personal data, remember that you have the possibility to exercise the following rights by contacting us:

- Right of access: you may request information about the personal data we have about you.
- Right of rectification: you can communicate any change in your personal data.
- Right of deletion and right to be forgotten: you can request the deletion of your personal data after it has been blocked. Please note that you can delete your account at any time.
- Right of limitation to the treatment: it supposes the restriction of the treatment of personal data.
- Right to object: If we process your information for our legitimate interests or those of a third party, or in the public interest, you may object and we will stop processing your information unless such processing is based on compelling legitimate grounds or is required by law.
- Right to portability: You can also request your data by sending us an email to rgpd@trialing.org if you require it and we will send it to you by email or to the address and entity you provide us.

Please note that in some cases these rights may be subject to limitations.

In addition, if you have a complaint about the processing of your data, you can file a complaint with the competent data protection authority.

7. What security measures do we apply to protect your personal data?

TRIALING has adopted the security levels of protection of personal data legally required and tries to install those additional technical means or measures at its disposal to prevent the loss, misuse, alteration, unauthorized access and theft of personal data provided to the organization.

8. Links to other sites or services

TRIALING is not responsible for the practices or practices of the services linked to our application/website or the information or content provided to you by them. Remember that when you use a link from our site to another service, our Privacy Policy does not extend to such third party services and the contact you make will be subject to the rules and policies of that third party.

9. What is TRIALING's presence on social networks?

TRIALING has the following profiles in the main Internet social networks (LinkedIn, Twitter).

It is recognized as responsible for the processing of data of its users, followers, or people who make comments through these. Also, in accordance with the Law of services of the information society and electronic commerce is exonerated from any liability for comments from users and followers in their social networks.

TRIALING may use the profiles described above to inform its users of topics it considers of interest to them.

10. Changes in the Privacy Policy

TRIALING may, at its sole discretion, modify or update this Privacy Policy, so we encourage you to review this section periodically. If changes materially affect the content of this Privacy Policy, you will be notified.

Date of last modification: 03/24/2023