

## **PRIVACY POLICY**

### **INTRODUCTION**

Fuld & Company and its affiliates (collectively hereafter referred to as “Fuld”, “us” or “we”) understand that your privacy is important to you. We are committed to respecting your privacy and protecting your personal data, which is any information that is capable of identifying you as an individual person. This Privacy Policy was last updated on April 28, 2022.

In addition, information that you submit to FULD in response to an email request for information or other outreach from FULD, or through FULD’s employment application processes, will be treated in accordance with this Privacy policy.

FULD may, in its discretion, amend this Privacy Policy from time to time. To ensure you are able to remain informed about the information we collect and how we use it, material changes to our statement will be reflected here. This site may contain links to external sites which are not governed by this Privacy Policy. FULD does not take responsibility for the privacy practices of any third-party sites to which we link. We encourage you to review the privacy policies of any such sites before you submit information there.

By browsing our website and expressly consenting where required (for instance, when submitting your application), you agree to be bound by this Privacy Policy.

### **INFORMATION THAT WE COLLECT**

FULD collects personal data in the course of its business activities, including in connection with some client services, when you seek additional information regarding our services or employment opportunities, databases, or register for newsletters and alerts and other FULD-sponsored events and participate in public user posting areas (such as bulletin boards, discussion forums and surveys) and invite you to participate in research and basis your consent conduct research and validate your feedback and views. If you do not provide such information, you may not be able to create an account for the Site, request copies of publications, subscribe for email newsletters and press releases, seek additional information regarding our services or employment opportunities.

Personal information that we collect includes names, addresses, e-mail addresses, phone numbers, fax numbers, unique personal identifiers, social media handles, , subject areas of interest and/or demographic information, background information required to apply for job and online behavioral information related to the Fuld website.

In addition, we collect information from 3rd party data providers like D&B, Hoovers, Capital IQ, Factiva, Bloomberg, Thomson, Zoominfo, Evaluate Pharma, PrivCo, PitchBook along with professional sites like LinkedIn, Xing, etc. where you have consented for the data to be passed to us. For online surveys we will record your IP address, type of browser, OS you are using, and other basic metrics.

### **CONTACTED BY TELEPHONE/MOBILE**

Our telephone interviewers are professionally trained and have been provided with basic information to deal with any queries that may arise during the course of a call. However, there

may arise additional questions after a call has ended, or you may want to comment or make a complaint.

*Where did you get my telephone number from?*

There are two main ways in which we may have obtained your telephone number:

- To ensure an independent, unbiased approach to collecting opinions that helps companies get an accurate picture of their customers' views, they often commission us to conduct surveys on their behalf with their customers. To enable such a survey, they would have passed your details to conduct research;
- Some of our clients want their surveys to be nationally or regionally representative of the population. In such cases we refer to various subscription-based databases like D&B, Hoovers, Capital IQ, Factiva, Bloomberg, Thomson, Zoominfo, Evaluate Pharma, PrivCo, PitchBook along with professional sites like LinkedIn, Xing, etc. to get the details of professionals qualified for the survey.

## **CONTACTED ONLINE**

Fuld takes every reasonable precaution to ensure the privacy and security of your information while using the survey websites.

## **HOW DO WE USE PERSONAL INFORMATION?**

The purposes and uses of your personal information will depend on the use of the Site and the personal information provided. We process your personal information:

(i) for the purposes of safeguarding the legitimate interests pursued by FULD. This includes:

- Informing you about updates to the service and notifying you about other products and services offered by FULD that may be of interest to you, including information regarding publications and events
- Tailoring your experience at the Site with relevant FULD materials
- Process your requests to participate in conferences and events
- Improving our web content and navigation.

(ii) on the basis of your consent. Insofar as you have granted us consent to the processing of personal information for specific purposes (for example, your application form for employment with FULD), the lawfulness of such processing is based on your consent. You may withdraw your consent at any time.

(iii) for inviting you to participate in research, conducting expert interviews and other research related interactions.

(iv) for compliance with a legal obligation. This includes anti-fraud and anti-money laundering measures as well as tax and social security requirements.

We will not sell, share, or rent or otherwise make available your personal information to other parties, except that we may disclose the information to third parties who perform services on our behalf and have a need to access the information in connection with those services. Any third parties will only process this information to the extent to which and within the limits that FULD itself is permitted to process that data. In addition, FULD may disclose your contact information in response to inquiries by bona-fide rights owners in connection with allegations of infringement of

copyright or other proprietary rights arising from information that you have posted on the Site or otherwise provided to FULD.

## **HOW WE MIGHT SHARE YOUR INFORMATION**

The third parties with whom we may need to share personal information to help us provide services and products, in the course of business activities, including client services and to run our Website include:

- our subsidiaries or affiliates and their personnel across our global organization;
- our advisors;
- our third-party service providers located throughout the world, including in countries where the local law may grant you fewer rights than you have in your own country;
- law enforcement bodies in order to comply with any legal obligation or court order
- To prevent fraud against FULD, our subsidiaries, affiliates and/or business partners;
- To support auditing, compliance, and corporate governance functions; or
- To comply with any and all applicable laws.

In addition, we may disclose or transfer your personal data in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

Because FULD is a global organization we need to transfer personal information which is collected on the Site or through other means across the FULD group of companies to help operate our business efficiently. This also includes third parties located in different countries around the world, including outside of the EEA. These arrangements may involve your personal information being located in various countries around the world e.g. USA where privacy laws differ. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect information held in that country. In addition, the Site may be viewed and accessed anywhere in the world including countries that may not have laws regulating the use and transfer of personally identifiable information. By using the Site, submitting information through this site, or submitting personal information to FULD through other means you voluntarily consent to such international transfer and hosting of such information to those countries and parties.

## **RETENTION OF YOUR PERSONAL INFORMATION**

Fuld retains your job application and CV's for three years. Business prospect related contact information will be held for twenty-four months from the most recent communication. Existing customer information will be held for the lifetime of our engagement and for seven years post the engagement.

All personal data is usually kept for six months from project commencement unless stated specifically at the time of taking part or six months after completion of research whichever date is sooner. Non-identifiable information you provide will be kept for no longer than nine months.

We may retain your personal information for longer if they may be the subject of a legal claim, or may otherwise be relevant for future litigation.

## **MARKETING**

If, at any time, you prefer not to receive further communications from us in any or all forms you will have the ability to unsubscribe from such communications by means of a link provided in such e-mail that is sent to you by us. Please note that we will continue to send you service-related communications regardless of any opt-out request. In order to continue service-related communication with you we will maintain details like your name, job title, company name, email address and company phone number. We will not share your information with third parties (other than our subsidiaries or affiliates) for their own promotional or marketing purposes unless you give us consent to do so and where permitted by applicable law.

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

FULD may use cookies on this Site and in our communications with you to keep track of your visit to our Site and our communications with you. With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored on your computer. Once you have given your consent to use cookies we shall store a cookie on your computer or device to remember this for next time. If you wish to withdraw consent at any time you will need to delete our cookies using your web browsers settings. Please be advised that certain sections or functionalities of the Site may be inaccessible to you if your browser does not accept cookies.

For more details, please [click here](#).

## **SECURITY PROCESSES**

FULD has in place appropriate security processes designed to protect personally identifiable information from loss, misuse, alteration or destruction. Only authorized employees and contractors will have access to any data provided by you, and that access is limited by need. Each employee or contractor having access to any personally-identifiable information is obligated to maintain its confidentiality. Although we take steps that are generally accepted as industry standard to protect your personally-identifiable information, FULD cannot guarantee that your personally-identifiable information will not become accessible to unauthorized persons and FULD cannot be responsible for any actions resulting from a breach of security when information is supplied over the internet or any public computer network.

## **LINKS TO OTHER WEB SITES**

This website contains links to other Web sites not operated by FULD.

FULD is not responsible for the privacy practices or the content of any non-FULD web sites to which we link from the Site. We are not responsible for the protection and privacy of any information you provide whilst visiting other websites and sites not governed by our Privacy Policy. We cannot control the content or security of such websites. We cannot be held responsible for any loss or damage incurred by a user as a result of visiting such websites. No links are intended to be, nor should be construed as, an endorsement of any kind by us of that other website.

## **COMPLIANCE WITH LAW**

FULD complies with all applicable privacy laws and regulations. FULD may be compelled to surrender personal user or customer information to legal authorities if presented with a court subpoena or similar legal or administrative order, or as required or permitted by the laws, rules and regulations of any nation, state or other applicable jurisdiction. Also, in the event of a violation of the terms and conditions of use of the Site or a violation of any restrictions on use of materials

provided in or through the Site, we may disclose personal user information to our affected business partners or legal authorities.

## **ACCESS RIGHTS**

In accordance with applicable data protection laws, including but not limited to the GDPR and the California Consumer Privacy Act (CCPA), you have a right to request a copy of the personal information we hold about you and details of how we use that information. If any of the information held about you is incorrect or out of date, you have the right to amend or rectify it, please follow the process outlined below and we will amend our records where appropriate. You also have the right to require us to erase your personal data, stop processing your personal data, restricting the processing of your personal information, right of portability of your personal information and/or to withdraw your consent to processing. This may not apply if there are other legal justifications to continue processing. If you think we may have incorrect personal information or would like a copy of the personal information we hold on you, or to exercise any other data protection right, please email us at [privacy@fuld.com](mailto:privacy@fuld.com). Please note that we need you to prove who you are before we can provide you with any information. You also have a right to lodge a complaint with a relevant supervisory authority.

If you do not want us to call you again, please email at [privacy@fuld.com](mailto:privacy@fuld.com) with your telephone number and ideally with details of the date/time we called you. We will add your number to our Do Not Call list to ensure you are not called again by us. In all cases, we will try to respond to your request as quickly as possible.

## **CHILDREN**

FULD understands the importance of protecting children's privacy, particularly in their online interactions. This Site is not designed for and does not intentionally target or solicit to children 18 years of age and younger.

## **CONTACT US**

For further questions you may contact the appropriate data protection point of contact:

Email: [privacy@fuld.com](mailto:privacy@fuld.com)

Telephone: 617-492-5900

Mail: Fuld & Company, 33 Arch Street, 17th floor, Boston, MA 02110. ATTN: Privacy