

Privacy Policy for Trial By Fire Solutions Websites
Policy Version : 15 Feb 2021

This Privacy Policy is provided by Trial By Fire Solutions (TBFS) to visitors of SimpleCTMS.com and SimpleTrials.com, which are public websites that do not require a subscription. This policy sets out how we collect and process personal information about website visitors (“visitor”) when they visit our websites located in the United States. Please note that for the purpose of EU data protection legislation, TBFS is the controller of website visitor’s personal information. We do not share or sell TBFS website data with 3rd parties, but we may use contracted 3rd party partners for website analytics purposes, for the processing of your request, for communication with you, or if we’re legally required to share it with someone outside of TBFS.

This policy does NOT cover personal information processed by customers (“subscribers”) of TBFS products/services. For more information on the privacy policy governing subscribers, please refer to our separate Privacy Policy for Subscribers.

Privacy Policy

At Trial By Fire Solutions, we are strongly committed to protecting your privacy. You can navigate the majority of our websites without giving us any personal information about yourself. However, you may opt to provide us with personal information in order to request further information about our products, services, industry papers, events or to subscribe for our on-demand CTMS, SimpleTrials.

Your privacy is important to us. To protect your privacy, we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. This policy is available in the footer of most website pages, including the website home page.

1. The Information We Collect and How We Collect it

This policy applies to all information collected or submitted on the Trial By Fire Solutions websites, SimpleTrials.com and SimpleCTMS.com. We collect information in several ways, which are described below:

- A. **Information we collect from you automatically** – When you visit our websites, we gather certain information automatically from your device and store it in log files. This information may include personal information such as your internet protocol (IP) address and non-personal information such as browser type, referring/exit pages, operating system, date/time stamp, clickstream data, landing page, and referring URL. This information is collected as you navigate through the website. Please also reference Tracking Technologies for additional detail.
- B. **Information you provide** - On some pages, you may opt to provide us information about yourself if you are interested in (a) receiving a demo of one of our products; (b) downloading a white paper or other document; (c) viewing our product legal documents (d) communicating with a Trial By Fire Solutions representative or (e) subscribing to our on-demand CTMS application SimpleTrials.

The personal information collected when you submit a website request may include name, title, company, email address and the contents of the message you send us. We may use this information to send automated reply emails. Any time you receive an automated email, you have the option of removing your personal information from the database by simply clicking on the unsubscribe link at the bottom of each email message. On some pages, you can request that a Trial By Fire Solutions representative contact you in order to answer questions or provide specific information. The personal information you provide on these forms may include your name, title, company name, and email address and the contents of the message you send to us. At any time, you have the option of removing your personal information from the database by replying to the company representative with your unsubscribe request.

If you wish to subscribe to receive our SimpleTrials on-demand product, you must complete the subscription registration page. This page is accessed through our website and it includes personal and financial data. In order to complete the registration, you must complete the subscription details and agree to the Master Subscription Agreement. If you do not complete the subscription, we do not collect and process the personal information. If you do submit the registration information, you become a subscriber in accordance with the Privacy Policy for Subscribers. This Privacy Policy and other legal agreements are accessible in the footer of the website.

2. The Way We Use the Information We Collect

We securely store the information you provide about yourself in order to provide you with the information, products, and/or services you request. Some of the ways we use your information for legitimate business purposes include:

- To communicate with you in response to your website submission request (e.g. demo participation invitations)
- Understanding and analyzing how you navigate within our websites to obtain the information you need
- Understanding how your interactions with our websites relate to our advertising campaigns
- To send marketing communications (e.g. product feature alerts, attendance at industry event)
- The use of non-identifying and aggregate information about the use of our websites to improve the navigation, content, and design of our website. 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.

The information you provide us about yourself will be shared with Trial By Fire Solutions personnel to the extent necessary to accommodate your request. By consenting with this privacy policy, you are also providing consent for us to share your identifiable information with third parties or services that we use in the course of doing business (e.g. the legitimate business purposes listed above), who are bound by confidentiality terms and privacy policies.

We do not sell or provide your personal information to third parties that are not directly related to servicing your request. For example, if you provide your name, mailing address, telephone and email address and request more information about Trial By Fire Solutions services; this information will have limited sharing with the appropriate Trial By Fire Solutions personnel to fulfill your request and will be entered into secured systems for tracking and communication purposes. This information will not be shared with any outside third parties without your consent.

3. Who We May Share Your Data With

Personal information that you submit through the websites may be transferred to countries other than where you live, such as, for example, to our servers and 3rd party affiliates located in the United States. Unless you give us your permission, we don't share data we collect from you with third parties, except as described below:

A. Third party Service Providers or Consultants

We may share data collected from you on the websites with third party providers or consultants who need access to the data to perform their work on TBFS behalf, such as a website analytics company or our third party advertising partners. Where required by law, we obtain your consent to use and process your personal data for these purposes (e.g. via your agreement with this policy when completing a contact form via our websites). These third party service providers are limited to only accessing or using this data to provide services to us and must provide reasonable assurances that they will appropriately safeguard the data. The following 3rd party providers support TBFS through information collected from our websites:

- Squarespace – our websites are built and hosted using the Squarespace platform. This includes the contact forms that you complete when providing personal data to us. Squarespace maintains technical and organizational security measures and has a Data Protection Agreement with TBFS for additional data protection measures. Additional information can be found here: <https://www.squarespace.com/privacy/>.
- Microsoft – we utilize Microsoft for customer relationship management (e.g. with Dynamics 365). This includes website visitors who submit personal information to us and personal data for individuals we meet at professional industry events and through business networking channels. Microsoft complies with SOC2, ISO 27001:2013, ISO 27017:2015, ISO 27018:2014, CSA, and has a Data Protection Agreement with TBFS for additional data protection measures. Additional information about Microsoft can be found here: <https://www.microsoft.com/en-us/trust-center/privacy>
- Salesforce – we utilize Salesforce to track and maintain our business development activities such as website visitors who submit personal information to us and personal data for individuals we meet at professional industry events and through business networking channels. Salesforce maintains ISO 27001, 27017, 27018, SOC 1-3 compliance, maintains Binding Corporate Rules and has executed a Data Protection Agreement with TBFS for additional data protection measures. <https://www.salesforce.com/company/privacy/>.
- Google Analytics – we utilize Google Analytics to improve our website experience for visitors. They use cookies to collect non-identifying information. Google provides some additional privacy options regarding its Analytics cookies here: <http://www.google.com/policies/privacy/partners/>.
- Mailchimp – we utilize Mailchimp email services for the promotion of new features, upcoming webinars and related business updates. Mailchimp maintains SOC2 compliance and has executed a Data Protection Agreement with TBFS

for additional data protection measures. Additional information can be found here: <https://mailchimp.com/legal/privacy/>.

- Box – we use Box for our internal company network. Content may include prospective client documentation such as confidentiality agreements. Box, Inc. maintains Binding Corporate Rules, compliance with SOC2, and has executed a Data Protection Agreement with TBFS for additional data protection measures. Additional information can be found here: <https://www.box.com/legal/privacypolicy>.

B. Compliance with Laws

We may disclose your data to a third party if: (i) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or government request (including to meet national security or law enforcement requirements); ii) to enforce our agreements and policies; iii) to protect the security and integrity of our website; iv) to protect ourselves, our other customers, or the public from harm or illegal activities. If TBFS is required by law to disclose any of your data that directly identifies you, then we will use reasonable efforts to provide you with the notice of that disclosure requirement unless we are prohibited from doing so by statute, subpoena or court or administrative order. Further, we object to requests that we do not believe were issued properly.

C. Business Transfers

Information may be disclosed and otherwise transferred to any potential acquirer, successor, or assignee as part of any proposed merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

4. Legal Basis for Processing Personal Information

Our legal basis for collecting and using the personal information described will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you where we have your consent to do so, where we need the personal information to contact you or where processing is in our legitimate interests and is not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal information in question. If we ask you to provide personal information to comply with a legal requirement, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (in addition to possible consequences should you decide not to provide your personal information). Similarly, if we collect and use your personal information in reliance on our or a 3rd party's legitimate interests and those interests are not already listed above, we will make clear to you at the relevant time what those legitimate interests are.

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.

5. Our Commitment To Data Security and Data Retention

Trial By Fire Solutions is committed to protecting your information. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect on our websites.

The information you provide us may be archived or stored periodically by us according to backup processes conducted in the ordinary course of business. Information stored as part of this backup process will be deleted in due course on a regular schedule. In general, we retain personal information we collect from you where we have an ongoing legitimate business need to do so. When we have no ongoing legitimate business need to process your personal information, we will either delete it, or if this is not possible, then we will securely store your personal information and isolate it from any further processing until deletion is complete.

6. Sensitive Data

Trial By Fire Solutions does not knowingly solicit or collect, and you should not provide to us, any information regarding an individual's medical or mental health condition, race or ethnic origin, political opinions, religious or philosophical beliefs or other sensitive data in website contact forms that you provide to us.

7. Tracking Technologies

A. Website Navigational and Performance Information

The Company uses Website Navigational Information to operate and improve the Service. The Company may use Website Navigational Information to analyze how you navigate within our websites to obtain the information you need.

B. 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 website. Trial By Fire Solutions uses cookies on our websites in order to track user sessions for website analytics.

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.

C. Web Beacons

The Company uses Web beacons alone or in conjunction with cookies to track and support Visitors to the Company websites and interaction with emails from the Company. Web beacons are clear electronic images that can track simple user activity, such as viewing of a transactional email sent by the system (e.g. system email alert when a user submits a contact form requesting more details about the products and services we provide). Web beacons may also track whether a user clicks on a link within an email that directs the user to one of the Company's Websites (e.g. an imbedded link within an email with signup details to attend a webinar). We use this information to track visitor activity and to improve the Company's Websites and email communications.

D. Do-not-track signals/California Do-Not-Track Disclosure

TBFS does not currently respond to web browser's Do-Not-Track signals. However, we do not share visitor information with advertising networks, nor do we display 3rd party ads on our website. You can learn more about Do Not Track here (<https://allaboutdnt.com/>).

8. Your Choices and Opt-Outs

TBFS takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete and up to date. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws (see below also Your Data Protection Rights Under GDPR and CCPA). You may update or remove the information you provided to us by contacting us on our website. To protect your privacy and security, we will also take reasonable steps to verify your identity before updating or removing your information.

9. Your Data Protection Rights Under the General Data Protection Regulation (GDPR) and California Consumer Privacy Act (CCPA)

Additionally, visitors from all locations have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by emailing contact@simplectms.com or contact@simpletrials.com
- In addition, you can **object to the processing** of your personal information, ask us to **restrict the processing** of your personal information, or **request portability** of your personal information. You can exercise these rights by emailing contact@simplectms.com or contact@simpletrials.com
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt-out of other forms of marketing, please contact us by email at contact@simplectms.com or contact@simpletrials.com
- If we have collected and processed your personal information with your consent, you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain** to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. A list of the European Data Protection Board Members can be found here: https://edpb.europa.eu/about-edpb/board/members_en.

10. Links To Other Websites

Our websites may contain links to other websites. For example, our News and Blogs section may redirect you to a press release or the website of the related industry trade show. You should carefully review the privacy policies and practices of linked websites, as we cannot control or be responsible for their privacy practices.

11. Children's Privacy

Trial By Fire Solutions does not knowingly collect information from children under the age of 18 and children under 18 are prohibited from using our services. If you learn that a child has provided us with personal information in violation with this Privacy Policy (e.g. they have completed contact form details and submitted to us), you can alert us at contact@simplectms.com or contact@simpletrials.com.

12. Notification Of Changes to this Privacy Policy

As we provide more services on our website and as privacy laws and regulations evolve, it may be necessary to revise or update our Privacy Policy from time to time. If we make changes to this Privacy Policy, we will notify you by posting an announcement on our Website if you have provided us with sufficient personal information to be contacted (e.g. more than IP address alone). If we materially change the ways in which we use or share personal information previously collected from you through our website, we will notify you by email or other communication.

13. International Data Transfers

Trial By Fire Solutions is a US-based company working as a global business supporting clients in the life sciences industry. We may transfer personal information to countries other than the country in which the data was originally collected. For example, we may collect and process your personal information to the United States or by using our 3rd party affiliates described earlier in this Privacy Policy (see also Who We May Share Your Data With). By reading this policy and using our websites, you acknowledge that your personal information may be transferred to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country. Where we do so, our collection, storage and use of your personal information will be in accordance with the purposes set out in this policy.

14. Contact Us

If you have questions or concerns about this Privacy Policy, please feel free to email us at contact@simplectms.com or contact@simpletrials.com.