

# Privacy Policy Statement for Quintiles Korea

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## *Global Data Protection Program*

Quintiles helps to improve healthcare worldwide by providing a broad range of professional services, information and partnering solutions to the pharmaceutical services, biotechnology and healthcare industries. We are the world's largest provider of biopharmaceutical development services and commercial outsourcing services. We conduct business in approximately 100 countries and have approximately 28,000 employees. We use the breadth and depth of our service offerings, our global footprint and our therapeutic, scientific and analytics expertise to help our biopharmaceutical customers, as well as other healthcare customers, navigate the increasingly complex healthcare environment to improve efficiency and to deliver better healthcare outcomes.

Quintiles and our subsidiaries and affiliates (collectively referred to as "Quintiles", "Company", "we" or "our") respect the relationships we have with our customers and respect the privacy of our employees, consumers, business partners and others whose Personal Information (see Definitions) may be processed by Quintiles in the performance of our services, including individuals participating in clinical research studies.

Quintiles intends that its corporate privacy policy and standard practices and procedures will ensure timely compliance with the national privacy laws and regulations of all the countries around the world in which we operate, including, without limitation, the Republic of Korea, Japan, Singapore, South Africa, Switzerland, the European countries within the European Economic Area, Canada, and the United States of America. To monitor implementation of the Company's global policy for the protection of individually identifiable information, Quintiles has chartered the Council on Data Protection (CODP), which serves as Quintiles' "privacy office" and internal privacy board. The CODP includes members and advisors from a representative cross-section of operations and across global geographies and lines of business, including Quintiles' Global Chief Privacy Officer, the Head of European Data Protection, and the Global IT Security Officer. In addition, the CODP is charged with monitoring Quintiles' compliance with applicable data protection laws and regulations. The CODP also functions as Quintiles' privacy inquiry office and has established the Privacy Incident Response Team (PIRT) to receive, investigate, track and guide resolution of any incidents / complaints that Quintiles may receive or identify regarding data privacy. Further, the CODP has established an ongoing privacy awareness training program which is required globally for all Quintiles employees.\* \* \*

Quintiles values the confidence of its customers and respects individual privacy, including Personal Information of employees, consumers, healthcare professionals, medical research subjects, clinical investigators, customers, business partners and investors. Not only does Quintiles strive to collect, use and disclose Personal Information in a manner consistent with the laws of the countries in which it does business, but it also has a tradition of upholding the highest ethical standards in its business practices.

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## ***PRIVACY POLICY (THE “POLICY”) FOR QUINTILES KOREA:***

**SCOPE:** This Policy applies to all Personal Information, either in electronic or paper format, received by Quintiles Transnational Korea Co., Ltd, (‘Quintiles Korea’) including Personal Information relating to investigators or participants in clinical trials where Quintiles Korea provides services to customers as a Contract Research Organization (“CRO”). **LIMITATIONS ON SCOPE:**

Adherence to this Policy may be limited to the extent required to meet a legal, regulatory, governmental, national security or public interest obligation. **DEFINITIONS:** For purposes of this Policy, the following definitions shall apply:

“Agent” means any third party that uses Personal Information provided to it by Quintiles Korea to perform tasks on behalf of and under the instructions of Quintiles Korea.

“Individual” means any person who is identifiable through the information that is being dealt with, and is the principal subject of the information.

“Quintiles Korea” means Quintiles Transnational Korea Co., Ltd,

“Personal Information” means any information or set of information that identifies or could be used by or on behalf of Quintiles Korea to identify an Individual. Personal Information does not include information that is anonymized such that an Individual cannot be identified. However, Personal Information includes information that does not, by itself, make it possible to identify a specific person, but that enables the identification of such a person easily when combined with other information. Personal Information may include Sensitive Personal Information.

“PIPA-Korea” means the Republic of Korea’s Personal Information and Protection Act”

“Sensitive Personal Information” means Personal Information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, criminal records, or that concerns health or personal sexuality or any other type of Personal Information which is likely to cause harm to an Individual’s privacy. In addition, Quintiles Korea will treat as Sensitive Personal Information any information received from a third party where that third party treats and identifies the information as sensitive.

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## **PRIVACY PRINCIPLES:**

The privacy principles in this Policy are based on the PIPA-Korea.

**ITEMS of PERSONAL INFORMATION:** Quintiles Korea collects and uses Personal Information and Sensitive Personal Information as below:

- Candidate: **Full** name, photo, gender, date of birth, address, home telephone number, mobile phone number, e-mail address, educational background (name and location of the school, major, year of entrance and year of graduation, graduation status, GPA, status of scholarship, etc.), work experience (company, title, responsible area, date of commencement of employment and last date of employment, service period, evaluation on work attitude and performance results, etc.), history of military service, history of awards and sanctions, any personal information that is described in any document which is submitted to Quintiles Korea, including letter of self-introduction, transcript, or similar, etc.
  
- Executives and Staff: Full name, date of birth, gender, home address, email address, home telephone number, office telephone number, fax number, mobile phone number, emergency contacts, account Nos. of financial institutions, photos, image, nationality, citizenship, military service records, family matters (family relations, full name, address, nationality, whether or not in cohabitation, whether or not supported, etc.), career records of former company (workplace, work years, post position/duty, transfer placements or date of retirement, duties in charge, wage information), highest level of academic career and academic records, license information on pharmacist, doctor, nurse, foreign language ability and other job-related achievements, information on qualifying certificates as proof of professional capability, details of management grade achieved according to performance evaluation, professional development plan such as internal/outside training course completion plan etc. and actual completion records, date of joining/retiring, leave and absence records, hours worked records, wage information (basic salary, bonus, welfare and benefits, miscellaneous allowances, etc.), position, title, wage system, grade, division, workplace, information about superiors and subordinates, employee ID Number, employment status, type, terms and employment contract, service records for the company, period of service for the company, retirement pension eligibility, records on promotion and disciplinary action, work attitudes and performance evaluation records, payment details of medical expenses for employee himself and his dependents, payment details of retirement annuity savings and insurance premium, payment details of donations, payment details of credit cards, payment details of school fee, veterans affairs matters (whether or not applicable, division of veterans affairs, No. of veterans affairs, the recipient of veterans affairs, veterans affairs authorities), whether married or not, whether obtaining credit guarantee insurance or not, resident registration number, foreign registration number, passport No., family resident registration number, health information (physique, clinical history, whether fall under the disabled or disability rating, health related information including disease/injury information, result of health check-up, etc.), etc.

- Research Site Staff: names, business contact information, work experience and professional qualifications (including applicable licenses and certifications), publications, resumes, and educational background, etc.
- Research subjects: name, initial, date of birth, sex, code used for identification, sensitive Information (health related information including medical history information, current health status, results of medical tests such as laboratory standards, and etc.)

**NOTICE:** Where Quintiles Korea collects Personal Information directly from Individuals, it will explain the purposes for which it collects and uses Personal Information about the Individuals, items of Personal Information to be collected and used, period of retention and use of Personal Information, the fact that the Individual has the right to refuse collection and use of Personal Information and in the case there are any disadvantages arising from such refusal, the details of such disadvantages, the types of non-agent third parties to which Quintiles Korea discloses that information, and the choices and means, if any, Quintiles Korea offers Individuals for limiting the use and disclosure of Personal Information about them. This explanation will be provided when acquiring consent of an Individual for collecting and using Personal Information. Where Quintiles Korea receives Personal Information from its affiliates or other entities including those in the United States of America, European Economic Area, Canada, Japan, Singapore, South Africa or Switzerland, and including when acting as a CRO processing Personal Information under the direction of a customer, it will use such information in accordance with the notices provided by such affiliates and entities and the choices made by the Individuals to whom such Personal Information relates. Quintiles Korea may not need to furnish notice where the processing in question is necessary to respond to a government inquiry; is required / authorized by applicable laws, court orders or government regulations; or is necessary to protect Quintiles Korea' legal interests and providing notice would interfere with the above requirements.

- Purpose of Collection and Use of Personal Information: For Individuals participating as subjects, clinical investigators or other study personnel in research studies being managed by Quintiles Korea as a CRO, Personal Information may be used in order to carry out the applicable studies and other study-related services. This may include the transfer of such Personal Information to the applicable study sponsor, business partners and third party service providers performing services related to the study (e.g., study data management, clinical research monitoring services, etc.). Quintiles Korea may also use the Personal Information to comply with our legal obligations, policies and procedures and for internal administrative purposes.
- For Individuals who are employees or potential employees of Quintiles Korea, we will process Personal Information to carry out and support our human resources functions and activities, administer employee participation in benefits, compensation and human resources plans and programs, manage employee performance, implement, investigate and report on compliance and discipline procedures and matters, and comply with our legal obligations, policies and procedures.
- For Individuals sharing Personal Information with Quintiles Korea in order to inquire about or otherwise make use of our services, we will use such Personal Information in order to provide the requested information, products, and/or services. Such uses may include processing requested transactions, improving the quality of our services, sending communications about our products and services, enabling our business partners

and service providers to perform certain activities on our behalf and complying with our legal obligations, policies and procedures and for other internal administrative purposes.

**CHOICE:** Quintiles Korea will offer Individuals the opportunity to choose whether their Personal Information is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the Individual. Unless required or authorized by law, Quintiles Korea will not process Personal Information about Individuals for purposes other than those for which the information was originally obtained or subsequently authorized by the Individual unless the Individual affirmatively and explicitly consents to the processing (“opt-in”). In some cases, even if an Individual opts-out of disclosures of their Personal Information, Quintiles Korea may still disclose such Personal Information if required to do so by law, if disclosure is required to be made to law enforcement authorities, if we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. Quintiles Korea also may transfer Personal Information in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, Quintiles Korea will direct the transferee to use Personal Information in a manner that is consistent with this Policy. Quintiles Korea will provide Individuals with reasonable mechanisms to exercise their choices.

**ONWARD TRANSFERS:** Transfers to third parties are covered by the provisions in this Policy regarding notice and choice. Quintiles Korea may also share an Individual's Personal Information with Agents, contractors or partners of Quintiles Korea in connection with services that these individuals or entities perform for, or with, Quintiles Korea. Quintiles Korea may, for example, provide an Individual's Personal Information to Agents, contractors or partners for hosting our databases, for data processing services, or to send to that Individual the information that he or she requested. Quintiles Korea will obtain assurances from these third parties that they will safeguard Personal Information consistently with this Policy. Where Quintiles Korea knows that an Agent, contractor, vendor, or partner is using or disclosing Personal Information in a manner contrary to this Policy, Quintiles Korea will take reasonable steps to prevent or stop the use or disclosure.

Details concerning the Personal Information Quintiles Korea provides or shares with its vendors or subcontractors must be provided upon request to individuals whose personal information was provided to these vendors or subcontractors pursuant to law, regulation, or contract. [\[Click here\]](#)

**ACCESS AND CORRECTION:** Upon request, and as required by law, Quintiles Korea will provide Individuals with reasonable access to the Personal Information that Quintiles Korea holds about them, subject to permitted exemptions. In addition, upon request, Quintiles Korea will take reasonable steps to provide Individuals with a means to correct, amend, or delete Personal Information that is found to be inaccurate or incomplete. Quintiles Korea when acting as a CRO has no direct relationship with participants in a clinical trial and any such Individuals who seek access, or who seek to correct, amend, or delete their inaccurate Personal Information should direct his or her query to the relevant study sponsor or investigator which has transferred such Personal Information to Quintiles Korea for processing.

**SECURITY:** Quintiles Korea will employ reasonable technical, administrative and physical safeguards to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. When Quintiles Korea is acting as a CRO and processing Personal Information as an Agent under the direction of its customers, Quintiles Korea enters into a contract with such customers specifying the conditions under which Personal Information received by Quintiles Korea are to be processed and kept secure.

**DATA INTEGRITY:** Quintiles Korea will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the Individual. Quintiles Korea will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete, current, and otherwise reliable in relation to the purposes for which the information was obtained. Quintiles Korea's employees have a responsibility to assist Quintiles Korea in maintaining accurate, complete and current Personal Information. When acting as a CRO, Quintiles Korea only processes Personal Information that is relevant to the services it provides, and only for purposes compatible with those for which the Personal Information was collected. As an Agent processing Personal Information as a CRO under the direction of its customers, Quintiles Korea works with such customers so that the customers can provide a way for Individuals to correct their Personal Information.

**ENFORCEMENT:** Quintiles' internal privacy board, the Council on Data Protection (CODP), has implemented internal, self-assessment procedures for periodically conducting random reviews of compliance of Quintiles's privacy practices including its international privacy practices. Quintiles Korea encourages individuals covered by this Policy to raise questions about the processing of Personal Information about them by contacting Quintiles Korea or Quintiles' CODP through the contact information provided below. Any employee that Quintiles Korea determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

**THE PERIOD OF RETENTION AND USE OF PERSONAL INFORMATION:** Quintiles Korea, in principle, will destroy your Personal Information without delay after the purpose of processing of Personal Information has been achieved. However, if there is a need to retain Personal Information as required by relevant law, Quintiles Korea will retain your Personal Information for so long as required by such law.

**DESTRUCTION OF PERSONAL INFORMATION:** When Quintiles Korea destroys Personal Information, it will implement measures to ensure that the information is destroyed in such a way that it cannot be restored or regenerated. If the Personal Information that needs to be destroyed is in the form of an electronic file, Quintiles Korea will permanently destroy such information so that any Personal Information contained within the electronic file is irretrievable in any intelligible manner. Any other document, printout, letter and other recorded media will be destroyed by incinerating or shredding them into pieces.

**DISPUTE RESOLUTION:** Any questions or concerns regarding the use or disclosure of Personal Information should be directed to Quintiles Korea or Quintiles' Council on Data Protection (CODP) through the contact information given below. Quintiles Korea will investigate and attempt to resolve complaints and disputes

regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy. For complaints by Individuals, including those involving human resources data that cannot be resolved between Quintiles Korea and an employee after following the internal review, complaint, and appeal procedures, Quintiles Korea has agreed to participate in the dispute resolution procedures of the applicable national data protection authority such as Personal Information Dispute Mediation Committee, the Korea Information Security Agency to resolve such disputes.

**CONTACT INFORMATION:** Questions, comments or concerns regarding this Policy should be submitted to the following Quintiles' e-mail address: [data.protection@quintiles.com](mailto:data.protection@quintiles.com).

**RESERVATION OF RIGHTS:** Quintiles Korea reserves the right to share an Individual's Personal Information as required or authorized by law or regulation or in response to duly authorized information requests of government authorities.

**CHANGES TO THIS PRIVACY POLICY:** This Policy may be reviewed and amended from time to time, without advance notice, consistent with the requirements of the PIPA-Korea to ensure that an appropriate level of protection for Personal Information is maintained. All amendments will be posted on this website. Please check back periodically for updates to this Policy.

PRIVACY POLICY VERSION 2.0 - EFFECTIVE DATE: 14 May 2014.

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In addition to this Privacy Policy Statement, which includes the Privacy Policy, Quintiles' "Privacy Policy for Web Site" is available on this Internet site at <http://www.quintiles.com/privacy>. Quintiles sees the Internet and the use of other technologies as valuable tools for communicating and interacting with consumers, employees, healthcare professionals, business partners, and others. Quintiles recognizes the importance of maintaining the privacy of information collected online and has created a specific Web Site Privacy Policy governing the treatment of Personal Information collected through web sites that it operates. The Web Site Privacy Policy also reflects additional legal requirements and evolving standards with respect to Internet privacy.

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