

The MRCT Center EEA Privacy Disclosures

Effective Date: June 8, 2018

Last Updated: June 8, 2018

[Introduction](#)

[How We Collect, Use and Retain Personal Data](#)

[How We Share and Disclose Personal Data](#)

[International Data Transfers](#)

[Additional Policies](#)

[Your Rights](#)

[Links to Third Party Sites and Social Media](#)

[Updates to the EEA Disclosures](#)

[Managing Communication Preferences](#)

[Contact Us](#)

Introduction

The following additional EEA privacy disclosures (the “**EEA Disclosures**”) supplement the MRCT Center Privacy Notice and Terms of Use. These EEA Disclosures apply only to how we collect, use, and share the Personal Data of individuals located in the EEA that we gather through our Online Platforms as a data controller or that we gather through other means that link to, expressly adopt, or reference in writing the EEA Disclosures and that are within the scope of the European Union’s General Data Protection Regulation (“GDPR”). The “**Online Platforms**” include the websites, and other digital properties that are owned and operated by the MRCT Center that link to these EEA Disclosures as well as certain third-party databases. “**We**” or “**MRCT Center**” mean the Multi-Regional Clinical Trials Center of Brigham and Women’s Hospital and Harvard and our affiliates and subsidiaries.

If you have any questions about these EEA Disclosures or our data practices, please contact us using the options provided below.

Please read these EEA Disclosures carefully. By using our Online Platforms, you consent to the data practices and other terms set forth in these EEA Disclosures.

How We Collect and Use Personal Data

When we use the term “**Personal Data**,” we mean data that can be used to identify you as an individual person. We collect several categories of Personal Data through our Online Platforms, including data you provide, data collected automatically from your device, and data we obtain

from third party sources. We use and share this Personal Data for the purposes described below, including as described under **Additional Uses of Personal Data**.

We rely on separate and overlapping bases to process your Personal Data lawfully. By way of example only, it may be necessary for us to process your Personal Data in certain ways in order to process a transaction you have requested or otherwise in accordance with a contract between us, or in certain cases we may process your Personal Data when necessary to further our legitimate interests, when those legitimate interests are not overridden by your rights and interests.

1. Data You Provide

We collect Personal Data you provide, for example when you enter the data into form fields on our Online Platforms. For example, we may collect:

<i>Category of Personal Data, as applicable</i>	<i>Purposes of Processing (see also Additional Uses of Personal Data below)</i>	<i>Legal Bases for Processing</i>
Contact Information including your name, home and/or work address, email address(es), and phone number(s)	To register you for events, authenticate you as a user, and communicate with you To provide you with information	To process transactions requested by you Legitimate interests Your consent, when applicable
Demographic Information including your date of birth, occupation/employer information, job title, participation in events at the MRCT Center	To better understand and analyze our customer population, support our operations, and deliver relevant products and services	To process transactions requested by you Legitimate interests Your consent, when applicable
Additional Information including your race/ethnicity, employment and/or educational history	To ensure courses, conferences, and communications are appropriately positioned	To process transactions requested by you Legitimate interests Your consent, when applicable

2. Data Collected Automatically

As is true of most digital platforms, we gather certain data automatically when you use our Online Platforms. This data may include browser, device, cookie and similar data that we collect as follows:

Category of Personal Data	Purposes of Processing (see also Additional Uses of Personal Data below)	Legal Bases for Processing
Log Files including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data	To maintain the security of our Online Platforms, for fraud detection, and to protect our rights To analyze the use of our website, for strategic decisions of website programming	Legitimate interests
Cookies, Analytics and Related Technologies For more information, including on how to control your privacy settings and your ad choices, see our Cookie Policy .	To manage our Online Platforms and email messages and to collect and track information about you and your activities online over time and across different websites and social media channels	Legitimate interests Your consent, when applicable
Location Information including latitude, longitude, date and time (the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider)	To offer you certain location-based services, such as announcing programs that are relevant to your particular location, and to conduct analytics to improve the Online Platforms	Legitimate interests Your consent, when applicable

3. Additional Uses of Personal Data

In addition to the uses described above, we may use your Personal Data for the following purposes, which uses may under certain circumstances be based on your consent, may be necessary to fulfill our contractual commitments to you, and are necessary to serve our legitimate interest in the following business operations:

- Operating our business, administering the Online Platforms, and managing your accounts;
- Contacting you to respond to your requests or inquiries;
- Processing and completing your transactions including, as applicable, event registrations, order confirmation, processing payments for online purchases and delivering products or services;
- Providing you with newsletters, publications, announcements, event invitations, and other information that we believe may be of interest to you;
- Conducting surveys, and similar inquiries to help us understand the business and trends;
- Analyzing your interactions with us, presenting offers and opportunities, and improving our services, programs, and other offerings;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Data, our website or data systems; or to meet legal obligations;
- Enforcing our Privacy Policy and Terms of Use and other agreements; and,

5. Legitimate Interests

We rely on several legitimate interests in using and sharing your Personal Data. These interests include:

- improving and customizing the Online Platforms for you;
- understanding how the Online Platforms are being used;
- obtaining insights into usage patterns of the Online Platforms;
- exploring ways to develop and grow our business;
- ensuring the safety and security of the Online Platforms; and
- enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks.

6. Data Retention

We will retain your Personal Data for as long as is necessary for the purposes set out in these EEA Disclosures, subject to your right, under certain circumstances, to have certain of your Personal Data erased (see [Your Rights](#) below), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights.

Where we are processing Personal Data based on our legitimate interests, we generally will retain such data for a reasonable period of time based on the particular interest, taking into account the fundamental interests and the rights and freedoms of data subjects.

Where we are processing Personal Data based on your consent, we generally will retain the data for the period of time necessary to fulfill the underlying agreement with you, subject to

your right, under certain circumstances, to have certain of your Personal Data erased (please see the Your Rights section below).

Where we are processing Personal Data based on contract or agreement, we generally will retain the data for the duration of the contract or agreement plus some additional period of time that is necessary to comply with law or that represents the statute of limitations for legal claims that could arise from the agreed upon relationship.

In addition, we may face threat of legal claim and in that case, we may need to apply a “legal hold” that retains data beyond our typical retention period. In that case, we will retain the data until the hold is removed, which typically means the claim or threat of claim has been resolved.

How We Share and Disclose Personal Data

We share your Personal Data with third parties only in the ways described in these EEA Disclosures. We may share your Personal Data with our affiliated entities, with service providers and business partners, such as for contacts database management, event registration, and online screen sharing services, and to comply with the law, to protect health and safety and to enforce our legal rights.

International Data Transfers

Because MRCT Center is located in the United States, your Personal Data may be transferred to, stored, and processed in the United States or another country other than the one in which it was collected. We may transfer your Personal Data outside the European Economic Area (“EEA”) and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws.

By contract: We will transfer your Personal Data outside the EEA if the transfer is necessary to the performance of a contract between you and MRCT Center (*e.g.*, delivering the services you have requested), or if the transfer is necessary to the performance of a contract between MRCT Center and a third party, and the third party was entered in your interest.

Standard Contractual Clauses: The European Commission has adopted standard data protection clauses, which provide safeguards for personal data transferred outside of the EEA. We generally use Standard Contractual Clauses when transferring Personal Data from a country in the EEA to a country outside the EEA. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in the [Contact Us](#) section below.

In addition, we may transfer your Personal Data outside the EEA if the transfer is necessary to establish, exercise or defend legal claims or to protect your vital interests.

Additional Policies

Certain websites, mobile applications or other digital properties included in the Online Platforms may contain additional disclosures related to your privacy. For example, if you register for an event through our website, the content of your submission will be used according to the terms set out in the policy of our third party for database management as well as in the ways described in these EEA Disclosures.

Please also review the following additional privacy policies, which apply to the Online Platforms referenced in such policies: [Constant Contact Privacy Statement](#).

Your Rights

We process all personal data in line with your rights, in each case to the extent required by and in accordance with applicable law.

Upon request, we will provide you with information about whether we hold any of your Personal Data along with any details required to be provided to you under applicable law. In certain cases, you may also have a right to:

- rectify any of your Personal Data that is inaccurate;
- restrict or limit the ways in which we use your Personal Data;
- object to the processing of your Personal Data;
- request the deletion of your Personal Data, and
- obtain a copy of your Personal Data in an easily accessible format.

To submit a request, please contact us as set forth in the **Contact Us** section below. We will respond to your request within a reasonable timeframe.

You also have the right to withdraw your consent to our processing of your Personal Data, when our processing is solely based on your consent. You can do this by discontinuing use of the Online Platforms, including unsubscribing from our newsletter and request that your Personal Data be deleted. If you withdraw your consent to the use or sharing of your Personal Data for the purposes set out in these EEA Disclosures, you may not have access to all (or any) of the Online Platforms, and we might not be able to provide you any of the Online Platforms and services. Please note that, in certain cases, we may continue to process

your Personal Data after you have withdrawn consent and requested that we delete your Personal Data, if we have a legal basis to do so. For example, we may retain certain data if we need to do so to comply with an independent legal obligation, or if it is necessary to do so to pursue our legitimate interest in keeping the Online Platforms safe and secure.

If you have any complaints regarding our privacy practices, you have the right to lodge a complaint with your national data protection authority (i.e., supervisory authority).

Links to Third Party Sites and Social Media

The Online Platforms may include links to websites and digital services operated by third parties. These EEA Disclosures do not apply to, and we are not responsible for the content, privacy policies or data practices of third parties that collect your data. We encourage you to review the privacy policies for those third parties to learn about their data practices.

The Online Platforms may allow you register for events and educational offerings, receive our newsletter, receive email communication, participate in online meetings, log into a social network or other third-party account. An example of a third-party login is “Log in with LinkedIn.” Logging into one of our Online Platforms with your social network or registering for an event on a third-party provider site may allow us to gather data that you give us permission to access from that social network or third party. The login feature may also transfer data to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically collect data such as your IP address, data about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of and your use of the login is governed by the privacy policy and terms of the party that provided the login functionality.

Updates to the EEA Disclosures

These EEA Disclosures is subject to occasional revision, and if we make any material changes in the way we use your Personal Data, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on the Online Platforms and updating the effective date above.

Any changes to these EEA Disclosures will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on the Online Platforms. These changes will be effective immediately for new users of our Online Platforms.

Please note that at all times you are responsible for updating your Personal Data to provide us with your most current email address. In the event that the last email address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the email containing such notice will nonetheless constitute effective notice of the changes described in the notice.

If you do not wish to permit changes in our use of your Personal Data, you must also notify us prior to the effective date of the changes and discontinue using the Online Platforms. Continued use of our Online Platforms, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Managing Communication Preferences

If you have opted in to our communications (or when permitted by law, if you have provided us with your contact information), we may send you email messages, newsletters, or other communications regarding products or services. You may ask us not to do so when you access our website, mobile applications, newsletter, or other communications. At any time, you may elect to discontinue receiving messages from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

Emails: To opt out of receiving communications via email, please send an unsubscribe request to the email address below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

Contact Us

If you have any questions, comments, requests or concerns about these EEA Disclosures or other privacy-related matters, you may contact us in the following ways:

MRCT Center
14 Story Street, 4th floor
Cambridge, MA 02138
USA

mrct@bwh.harvard.edu
617-496-9807