

PRIVACY POLICY

This Privacy Policy is a document related to the Platform Terms and Conditions available here [crowdwise.bio/terms] (“Terms and Conditions”). Definitions of the terms used in the Privacy Policy were included in the Terms and Conditions.

The Policy is for information purposes and serves satisfaction of the information obligations imposed on the data controller under the GDPR, i.e. Regulation (EU) 2016/679 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 (General Data Protection Regulation).

1. PERSONAL DATA CONTROLLER

- 1.1 The controller of the personal data of the Users and other persons visiting the Platform (also referred to as “you,” “your”) is [CrowdWise Inc.] (“Service Provider,” “we,” “us,” “our”).

2. SERVICE PROVIDER’S REPRESENTATIVES

- a. Being a personal data controller that is not established within the European Union, we have appointed a representative as prescribed in Article 27 of the GDPR. This representative is GDPR Local (gdprlocal.com).
- b. You may contact our representative - GDPR Local by e-mail at: [datarequest@datarep.com], by phone at: [...], and by post at: [...].
- c. Being a personal data controller that is not established within the United Kingdom, we have appointed a representative as prescribed in Article 27 of the UK GDPR and Article 181 of UK Data Protection Act. This representative is Biokami Ltd (biokami.com).
- d. You may contact our representative - Biokami by e-mail at: [...], by phone at: [...], and by post at: [...].
- e. Our representatives are duly authorised by us – they may handle both data subjects and supervisory authorities with respect to all matters relating to compliance with the GDPR (GDPR Local) or UK Data Protection Act (Biokami).
- f. Contacting our representative is your right and not an obligation. You can contact us directly – you will find the contact details in clause 3 below.

3. CONTACT WITH THE DATA CONTROLLER. DATA PROTECTION OFFICER

- a. You can contact us at the e-mail address: [legal@crowdwise.bio]. However, we recommend that you contact our representative (see clause 2 above) or our Data Protection Officer.
- b. Having in view the personal data processing carried out by us, in accordance with Article 37 of the GDPR, we have appointed a Data Protection Officer. This is [first and last name], and you can contact him/her at the phone number: [...] and by e-mail at [...].

4. DATA PROCESSING METHOD

- 4.1. The scope, purposes, and legal grounds for the processing of your personal data are presented in the table below.

Purpose	Scope of data	Legal ground	Processing period
providing access to the Platform	IP address	Article 6(1)(b) of the GDPR – processing is necessary for the performance of the Agreement or undertaking actions upon request of the data subject prior to concluding the Agreement	until lapse of the period of limitation applicable to claims connected with access to the Platform and the User’s actions within the Platform, counted from the time of the User’s last visit on the Platform
setting up an Account on the Platform	e-mail address, first and last name		
creating a Researcher’s profile on the Platform	first and last name, image, description of the research project, other personal data voluntarily provided by the Researcher within the Platform functionalities		

obtaining an Authorisation	first and last name, e-signature, other identification data necessary to ensure the effectiveness and validity of the Authorisation		until lapse of the period of limitation of claims connected with the activities undertaken as part of the Authorisation
obtaining and storing health-related data/genetic data based on the Authorisation	first and last name, e-signature, other identification data necessary to ensure the effectiveness and validity of the Authorisation, health-related and genetic data obtained from the medical facilities indicated by the User	Article 6(1)(b) of the GDPR – processing is necessary for the performance of the Agreement or undertaking actions upon request of the data subject prior to concluding the Agreement – in the scope of ordinary data Article 9(2)(a) of the GDPR – consent of the data subject to the processing of special categories of personal data within the scope of the Authorisation – in the scope of personal data related to health	in the scope of ordinary data – until the lapse of the period of limitation of claims connected with the storage of data based on the Authorisation in the scope of health-related data, until the consent (including the Authorisation) is withdrawn or until the data cease to be useful
carrying out the initial selection of the User	information (personal data) included in the User's medical records obtained based on the Authorisation	Article 6(1)(a) and Article 9(2)(a) of the GDPR – consent given by the data subject to the processing of his/her personal data	until data cease to be useful (end of the initial selection process) or the data subject withdraws the consent
enabling the User to enrol in the Research	first and last name, information included in the questionnaire filled in by the User	Article 6(1)(f) of the GDPR – legitimate interest of the controller that consists in enabling the User to take action to apply for participation in the Research	until the lapse of the period of limitation of claims connected with the User's application or until the User objects
enabling the conclusion of the agreement between the User and the Researcher	first and last name, e-signature, other data enabling the identification of the relevant person for the purposes of the respective agreement	Article 6(1)(b) of the GDPR – processing is necessary for the performance of the Agreement or undertaking actions upon request of the data subject prior to concluding the Agreement (in the	until the lapse of the period of limitation of claims connected with the agreement concluded between the User and the Researcher

		<p>scope in which it is the Service Provider's liability to intermediate in the conclusion of agreements between the User and the Researcher)</p> <p>Article 6(1)(f) of the GDPR – legitimate interest of the controller that consists in enabling the Platform Users to conclude agreements related to the Research</p>	
sharing the User's personal data with the Researcher	information (personal data) included in the User's medical records obtained based on the Authorisation	Article 6(1)(a) and Article 9(2)(a) of the GDPR – the User's consent to the sharing of his/her personal data (including personal data related to health) as part of the relevant Research	until the Research is completed or the User withdraws the consent
verifying the User, including the Researcher	first and last name, a photocopy of the document confirming identity, bank statements, utility bills, address (Researchers), incorporation certification (Researchers)	Article 6(1)(f) of the GDPR – legitimate interest of the controller that consists in verifying the Platform Users and preventing unfair practice, including providing false information or attempts at deceiving persons to share personal data	<p>until data cease to be useful (the full verification of the User is completed) or the User objects (if such an objection proves justified)</p> <p>The document photocopy will be deleted immediately once the verification is completed.</p>
contact with the Users, responding to queries	first name, e-mail address, order ID, Meta Messenger data, other data voluntarily provided by the relevant person as part of communicating with us	Article 6(1)(f) of the GDPR – legitimate interest of the controller that consists in responding to queries and correspondence provided directly by the data subjects	until correspondence ends or the User objects
analysing traffic on the Platform	IP address, Cookies: [analytics cookies, session cookies, secure cookies, temporary cookies, persistent cookies]	Article 6(1)(a) of the GDPR – consent given by the User	until the data cease to be useful or the User withdraws the consent

sending information content related to the Platform and the Service Provider	e-mail address	Article 6(1)(f) of the GDPR – legitimate interest of the controller that consists in informing about the Platform, its functionalities, and content published thereon article 6(1)(a) of the GDPR – consent given by the data subject	until data cease to be useful, the Account is deleted, or the User objects where processing is carried out based on the consent, until the data subject withdraws the consent or the data cease to be useful
protection against claims, raising claims	e-mail address, first and last name, other data voluntarily provided by the User onto the Platform	Article 6(1)(f) of the GDPR – legitimate interest of the controller that consists in protecting against claims and raising claims	until lapse of the period of limitation applicable to claims connected with access to the Platform and the User's actions within the Platform, counted from the time of the User's last visit on the Platform

- 4.2. If we are advised that you use the Platform in violation of the Terms and Conditions or applicable provisions of law, then we may process your personal data to the extent required for establishing the scope of your liability.
- 4.3. The provision of personal data as part of the Platform is voluntary. As a result of failure to provide them, however, you will not be able to create the Account, enter information into the Database, participate in the Research, or make use of other services we offer.
- 4.4. You will not be subject to automated decision-making, within the Platform. You may be subject to profiling to suggest which Research you should sign up for. Such actions will be taken solely on the basis of your consent given via Platform's functionalities, which you can withdraw at any time.
- 4.5. We will obtain some of your personal data not directly from you but from medical facilities that have been involved in providing medical services to you. This will only happen if you give us the respective Authorisation to obtain them according to the principles described in the Terms and Conditions. You may withdraw the Authorisation at any time, which is equivalent to withdrawing your consent to our processing of your personal data collected in the manner described in the preceding sentence (for more information about withdrawing the consent, see clause 7 of the Privacy Policy).

5. RECIPIENTS OF DATA

- 5.1. We may entrust the processing of personal data to third parties for the purpose of carrying out the activities indicated in the Terms and Conditions and servicing the Users. In this case, the recipients of your data may include: hosting provider, e-mail operator, law firms), providers of traffic analysis solutions within the Platform), IT service providers (including in particular London-based Biokami Ltd.), the representative referred to in clause 2 of the Privacy Policy.
- 5.2. Each entity to which we transfer personal data for processing on the basis of a personal data transfer agreement ("Transfer Agreement") guarantees an adequate level of security and confidentiality of the processing of personal data. The entity processing your personal data on the basis of the Transfer Agreement may process such personal data through another entity only upon our prior consent.
- 5.3. Personal data collected by us may also be disclosed to: competent state authorities upon their request on the basis of relevant provisions of law or other persons and entities – in the cases prescribed in the provisions of law.
- 5.4. Where you decide, within the Platform, to provide your personal data to a particular Researcher, we as the Service Provider will make your personal data obtained in accordance with clause 4.5 of the Privacy Policy available to that Researcher on the terms prescribed further in the Terms and Conditions. Information enabling the identification of the relevant User will only be made available at the end of the Research, while in the first phase the Researchers will receive it in anonymised form (making it impossible to identify individuals).
- 5.5. Please be aware that once the Researcher receives your personal data, the Researcher should, no later than 30 days from receiving them, provide you with information related to the purposes, processing methods, and legal bases for the processing of your personal data.

6. TRANSFERRING PERSONAL DATA BEYOND EEA

- 6.1. The Users' personal data may be transferred to third countries, due to the purpose of the Platform operation and the activities carried out by the Researchers within the Platform. Also, we, as a company incorporated under the laws of the State of Delaware, may transfer the Users' personal data to third countries, namely, in particular to the United States of America and to the United Kingdom.
- 6.2. The transfer of personal data to third countries will occur in two cases, namely: (i) as part of our internal processes as the Service Provider; (ii) where personal data of a group of Users are shared with the Researcher in accordance with the Terms and Conditions.
- 6.3. As a rule, transferring personal data to third countries will only take place to the countries for which the European Commission has issued a decision confirming that the third country ensures an adequate level of protection or if the data recipient provides for adequate safeguards, e.g. in the form of standard contractual clauses and ensuring the effective exercise of the rights of the data subject, and the existence of effective legal remedies in the recipient's country.
- 6.4. If the User has decided to support the Researcher's activities in a third country other than the countries referred to in clause 6.3 above, the transfer of data to such a country will only take place after we indicate the risks connected with such a transfer and, subsequently, the User gives his/her separate consent.

7. RIGHTS OF THE DATA SUBJECT

- 7.1. You have the right to: (i) delete the personal data referring to you collected within the Platform, (ii) restrict the processing of data, (iii) portability of your personal data, in this to receive them in a structured form, (iv) request us to enable you access to your personal data and to rectify them, (v) object to processing, (vi) withdraw the consent at any time without affecting the legality of processing carried out on the basis of the consent before it is withdrawn (including sharing your data before the consent is withdrawn as prescribed in clause 5.4. of the Privacy Policy); (vii) lodge a complaint about us to the supervisory authority.
- 7.2. To exercise your rights, contact us or our representative. You will find the relevant contact details in clauses 2 and 3 of the Privacy Policy.

8. OTHER DATA

- 8.1. We may store http enquiries, therefore the files containing web server logs may store certain data, including the IP address of the computer sending the enquiry, the name of the station – identification through http protocol, if possible, date and system time of registration on the Platform and receipt of the enquiry, number of bytes sent by the server, the URL address of the site visited by the User before if the User has entered the service through a link, information concerning your browser, information concerning errors that occurred during the http transaction. Web server logs may be collected for the purpose of proper administration of the Platform. Only persons authorised to administer the IT system have access to data. Files containing web server logs may be analysed for the purposes of preparing statistics concerning traffic and occurring errors. Summary of such details does not identify a specific person, and hence they are not personal data.

9. SECURITY

- 9.1. We apply technological and organisational means in order to provide for protection of the processed personal data corresponding to the threats and category of data to be secured, in particular, through technical and organisational means we secure data against being published to unauthorised persons, taken over by an unauthorised person, processed in violation of the law, and changed, lost, damaged, or destroyed; among others we apply the SSL certificates. The set of collected Users' personal data is stored on a secured server. Data are also secured by our internal procedures related to the processing of personal data and information security policy.
- 9.2. We have also implemented appropriate technical and organisational means, such as pseudonymisation, designed to effectively enforce the data protection principles, such as data minimisation, and for the purpose of providing the processing with necessary safeguards, so as to meet the GDPR requirements and protect the rights of data subjects. In order to protect the Users, information enabling their identification is shared with the Researchers only upon the end of the carried out Research if necessary for Researchers to enter into legal contracts with Users or continue with follow-up studies. Researchers who accept terms of service are obliged to respect commitments they made to users in the study profile page, if at some point they need to get into legally binding contracts to do so we will share identification data with them. Terms of Service can be found at crowdwise.bio/terms.
- 9.3. Please remember that using the Internet and services provided by electronic means may pose a threat of malware breaking into your ICT system and device, as well as any other unauthorised access to your data,

including personal data, by third parties. In order to minimise such threats, you should use appropriate technical safeguards, e.g. use updated antivirus programs or programs securing the identification in the Internet. In order to obtain detailed and professional information related to security in the Internet, we recommend taking advice from entities specialising in such IT services.

10. COOKIES

- 10.1. In order to ensure correct operation of the Platform, we use Cookie support technology. Cookies are packages of information stored on your device through us, usually containing information corresponding to the intended use of a particular file, by means of which you use the Platform – these are usually: address of the website, date of publishing, lifetime of a cookie, unique number, and additional information corresponding to the intended use of a particular file.
- 10.2. We use two types of Cookies: (a) session cookies, which are permanently deleted upon closing the session of the browser; (b) permanent cookies, which remain on the device after closing the session until they are deleted.
- 10.3. It is not possible to identify you on the basis of Cookie files, whether session or permanent. The Cookie mechanism prevents collection of any personal data.
- 10.4. The Cookies used by us are safe for your device, in particular they prevent viruses or other software from breaking into to the device.
- 10.5. Files generated directly by us may not be read by other websites. Third-party cookies (i.e. Cookies provided by entities co-operating with us) may be read by an external server.
- 10.6. You may individually change the Cookie settings at any time, stating the conditions of their storage, through the Internet browser settings or configuration of the service, as well as by means of the functionalities of the website.
- 10.7. First of all, you may disable storing Cookies on your device in accordance with the instructions of the browser producer, but this may disable certain parts of or the entire operation of our Platform.
- 10.8. You may also individually remove Cookies stored on your device at any time in accordance with the instructions of the browser producer.
- 10.9. We use own Cookies for the following purposes: authentication of the User and maintaining the User's session; configuration of the website and adjustment of the page content to the preferences or conduct of the User; analysis and research of views, click number, and path taken on the website to improve the appearance and organisation of the content, time spent on the Platform, number and frequency of visits on our Platform.
- 10.10. We use Third-party Cookies for the following purposes: preparing statistics (anonymous) for the purposes of optimising the functionality of the Platform by means of analytic tools.
- 10.11. The scope of Cookies used by us depends on the consents given by the relevant person by means of the functionalities provided within the Platform.
- 10.12. Detailed information concerning Cookie support is available in your browser settings.

11. FINAL PROVISIONS

- 11.1. This Privacy Policy comes into effect on 25.10.2024.