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Privacy Policy

TriTiCon ApS

Written By

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Approved By

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1. Background

TriTiCon is a consultancy company, providing advisory and consultancy services, and the company does not as part of normal business processes collect, manage or store any data, hereunder no personal data.

However, to support daily operations, limited information about clients, providers and employees is maintained by TriTiCon. This is typically contact information for clients and providers, and human resource information (contact details, salary, bank information, and CV) for employees. It should be noted that this information is kept in its original and operational format, (email address book, CVs as word or pdf-files etc), and not stored in databases or any other structured format.

TriTiCon reserves the right to change the terms of this Privacy Policy from time to time. It will be updated at TriTiCon's website at <http://www.triticon.com>.

2. General

2.1 Data Handling Officer

The CEO appoints a Data Handling Officer, responsible for maintaining the Data Handling Plan for Personal data (see section 2.2), ensuring consent for storing personal data (see section 3.2) and handling requests for information, and updating or deleting of personal data (see sections 3.3). The name and contact details to the Data Handling Officer should be clearly available on the company website (<http://www.triticon.com>).

2.2 Data Handling Plan for Personal Data

TriTiCon maintains a Data Handling Plan for Personal Data, listing categories of personal data, GDPR approach and status.

3. Policy

General handling of personal information

TriTiCon does not consolidate or store records in databases or in other way manage personal information as "data". Received personal data should only be kept in the original form (email addresses in mail-system (not in centrally available contact lists), CVs, etc).

3.1 Consent

Consent must be obtained for storage of personal information. The purpose, storage format and access to the information should be clearly stated in the consent.

Note: Consent to keep in the information in its original form is implicitly considered when information is actively provided by the individual to TriTiCon without request.

For example: if an individual sends an unsolicited application with contact details and a CV, this email and the CV may be kept by TriTiCon (in its original form) without further consent by the sender. Similarly, if a company representative sends unrequested information (sales propositions etc.) to TriTiCon, including contact information, attachments with additional information related to the individuals in the company, this email and attachments may be kept (in its original form) without further consent.

3.2 Rights to information, and corrections and deletions to personal information.

TriTiCon will, on request via mail, email or phone, and on verification of the identity of the requestor, provide all information to the individual. On request, TriTiCon should correct or delete the information. TriTiCon reserves the right to choose the option of deleting all information for the individual, instead of updating the information. TriTiCon does not accept any obligation to update nor maintain information on any individual not employed in the company.

3.3 Data-categories and approach

The below describes TriTiCon's general approach to main categories of personal information. Details for each should be described in the Data Handling Plan for Personal Data (see Section 2.2).

3.3.1 Service related data

TriTiCon does not, as part of regular services, collect, manage or store any data (hereunder no personal data). However, TriTiCon does operate in the field of clinical trials, where collection of personal data is a central process. Should TriTiCon engage in not only the advisory and consultancy role on *how to* manage such data, but also in the *actual handling of personal data*, this work should be performed within the client company (adhering to clients' policies and management systems as well as the clients' physical IT infrastructure).

3.3.2 Client and Provider contact information

TriTiCon does maintain basic contact information for existing clients and providers. This information is considered a requirement for operating the business, and is kept to a minimum (name, title, email address, mail address and phone number). Consent to keep this information is considered as implicit when the information is actively provided in contracts or other agreements, including the purpose and intended use of the information.

3.3.3 Employee information

TriTiCon does maintain employee information as required for administrative purposes and for Danish employment regulations. This information includes, but is not limited to, contact information, CV, bank and tax information, and emergency contact details. Written consent from the employee and next of kin (if required) will be obtained for this information.

This information will be kept to a minimum, and will be deleted when the employment ends.

Note: Regulatory requirements for the conduct of clinical development requires that certain records on who did what and when is maintained for up to 20 years. Such required information may be kept according to these regulations. I.e. User information (Name, email, user ID) and system audit trails on user activities might be kept if required by regulations for clinical development.

3.3.4 Unsolicited information

Sales emails, commercial letters and brochures, unsolicited applications, etc, sent to TriTiCon without TriTiCon request, are considered to be sent with implicit consent to keep the information in its sent form. However, TriTiCon must not record the information in structured format, forward or in any other way distribute the information.

4. Webpage

TriTiCon does not collect any cookie-based data on our website and subsequently no personal information is collected from our web visitors. Only non-personal user information on visitors over time, time spent and location (Country/US state) is logged by the web-site provider.



5. Contact us

Any questions, comments or concerns regarding the use or disclosure of personal information, or any recommendations to improve this privacy policy, can be sent to TriTiCon by emailing:

dataprivacy@triticon.com

6. Approval and signatures

Date: _____

Date: _____

Place: _____

Place: _____

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