

## **CLINICAL TRIAL GDPR PRIVACY NOTICE**

**Study Institution/Data Controller:** Sloan Global Holdings, LLC (“**Sloan**”) on behalf of Sloan Water Technology Limited; 4 Coleman Street, 6th Floor, London, United Kingdom, EC2R 5AR (“**Sloan UK**”); Contact Person: Nicole Lapierre, DPO,dpo@sloan.com

Your Study Data, as defined below, is regulated under the UK General Data Protection Regulation and the Data Protection Act 2018 (collectively, the “**UK GDPR**”). Sloan acts as the lead Data Controller with respect to Your Study Data, working with research partners who act as joint controllers and/or processors for specific aspects of the research study.

### **Research Study Data**

When you participate in a clinical trial or research study of Sloan Global Holdings, LLC (a “**Study**”), Sloan will generate and record data about your participation in the Study. In addition, we collect information such as your contact details, date of birth, medical history, biological samples (e.g., blood, saliva, wound swabs), photos, and sensitive data such as health, biometric, genetic, racial or ethnic origin, sex life/sexual orientation, political beliefs, and trade union membership, as needed for this study.

### **Purpose of the Data Collection**

Your data may be used to determine eligibility, contact you about participation, conduct and monitor the study, ensure accuracy and compliance, report to regulators, and for related future research, as permitted by law and your consent. The legal bases for processing this data is your consent when you sign up as a participant, but in the context of the particular study or trial may be the public interest.

### **Recipients of Your Study Data**

Your data may be accessed by the study sponsor, research partners, the study team, ethics committees, regulators, and other researchers where you provide consent or as required by law.

Depending on the future research uses of Your Study Data you consent to in this form, Your Study Data may also be disclosed to researchers not affiliated with the study sponsor or with the study team.

### **Study Data to be transferred to other countries outside the EEA**

Your data may be transferred outside the UK under approved safeguards (such as the UK IDTA or contractual clauses) to ensure its protection. Contact us for more information about these safeguards. International transfers are subject to legal requirements and do not rely solely on your consent.

All transfers will comply with UK GDPR requirements for international data transfers, and additional safeguards will be implemented where necessary to ensure adequate protection of Your Study Data.

If you reside in the European Economic Area during your participation in the study, in the event we disclose Your Study Data to other recipients, we will only do so with your consent.

## **GDPR Rights Respecting Your Study Data**

Under the UK GDPR, you have certain rights with respect to Your Study Data. You may request access to, correction or deletion of your data, restrict or object to processing, or request data transfer to another party. Contact us to exercise your rights.

We will retain your data for up to 10 years, depending on the nature of the data, after study completion or until you withdraw consent, in accordance with regulations. Withdrawing consent will not affect use of your data up to that point, and some data may be retained for legal or research purposes as required by law. For withdrawal, please email [DPO@Sloan.com](mailto:DPO@Sloan.com) and put the name of the trial in the Subject Line of the email along with the name of the study for proper forwarding, as follows: ***"A1C Trial - Clinical Study Withdrawal"***. We may instruct you that you also need to contact the trial Contract Research Organization or "CRO" or others involved to request removal, different partners follow documented withdrawal and retention procedures of their own, but we will provide guidance on this as appropriate.

Technical and organizational measures are in place to ensure effective implementation of withdrawal requests across all partners. If you decide to withdraw Your Study Data from such use, you should notify the Contact Person immediately. If you withdraw your consent to future research, this will not affect the lawfulness or our use and sharing of Your Study Data up to the point in time that you withdraw your consent. Even if you withdraw your consent to future research, we may still use Your Study Data that does not identify you for future research, except for where we are required by law to maintain your identifiable personal data.

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