

# PRISTA PRIVACY NOTICE

Prista Corporation (“Prista”) is a C corporation organized under the laws of the state of Delaware. References in this policy to “we”, “us” or “Prista” are references to Prista Corporation. Reference in this notice to “personal data” means any information that identifies, or could reasonably be used to identify, a living individual, either on its own or together with other information. Please also Note our Cookie Policy, shown below which explains the use of cookies and other web tracking devices via our websites.

Prista is committed to protecting and respecting your privacy.

***Please read this notice carefully to understand our practices with respect to personal data.***

## How we obtain your personal data

Operating both a general information website and a web based application, we regularly receive personal data as part of our operations. We may collect your personal data:

- When you browse or interact with our website(s) or use any of our online services;
- When you or your organization requests information about us and our product, or requests contact from us on our website;
- As part of our business intake procedures;

Ordinarily, you will have provided any such data to us. But in some cases, we may collect data about you from a third party source, such as government or credit reporting agencies, an information or service provider or from public records.

## The personal data we collect and process

The personal information that we collect and process may include:

- Basic information, such as your name, your employer, your title or;
- Contact information, such as your physical address, email address and phone number(s);
- Technical information (including your IP address), such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically;
- Information you provide to us for the purposes of attending webinars and events,;
- Identification and background information provided by you or collected by us as part of our business engagement processes;
- Any other information relating to you which you may provide to us.

## How we use your personal data

Whether we receive your personal data directly from you or from a third party source, we will only use your personal data in connection with our ordinary professional activities (including the fulfilment of our legal or regulatory obligations). These “Permitted Uses” may include:

- Managing our business relationship with you or your organization, whether in connection with the provision or procurement services, including subscription or access of our ActionCue Clinical Intelligence online application, or as your vendor or service provider, including processing payments, accounting, auditing, billing and collection and related support services;
- Acting in compliance with our legal obligations, including with respect HIPAA;
- Managing and securing the access to our systems and online platforms;
- Complying with court orders and other legal and regulatory requirements;
- Processing that which is necessary for purposes of the legitimate interest of Prista or third parties provided that such interests are not overridden by your interests or your fundamental rights and freedoms; and
- For any purpose related to the foregoing or for any purpose for which you provided the personal data to Prista.

If you have given us your express consent, we may process your personal data for additional purposes. You may withdraw your consent at any time. Additional purposes for which we may process your personal data may include:

- Communicating with you with respect to legal developments, announcements, events and Prista products and services which may be of interest to you;
- Distributing surveys or marketing materials;
- Gathering information regarding your preferences to improve the quality of our communications and interaction with you, such as through website analytics or the tracking of our client publications; and
- Any other purpose for which you have given consent.

## How we share your personal data

Irrespective of how we obtain your personal data, it may be shared among any employees, officers or contractors of Prista specifically for their respective role in maintain our relationship with you and the delivery of services and support. Our policy requires all persons and operation to at all times ensure a level of data protection at least as protective as those mandated by all applicable laws and regulations. We may also need to transfer personal data to third parties, including third parties, for example (but not limited to) sub-contractors, Prista’s technical and operating partners or others specifically serving Prista’s lawful and permitted business purposes with respect to our relationship with, and obligations to, you.

Where we share or transfer your personal data, we will do this in accordance with applicable data protection laws and will take appropriate safeguards to ensure its integrity and protection.

## **Keeping your personal data secure**

We will take appropriate technical and organizational measures against unauthorized or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering its storage, access and destruction. Personal data may be stored on our own technology systems or those of our vendors or in paper files.

## **Retaining your personal data**

We will delete your personal data when it is no longer reasonably required for the Permitted Uses or you withdraw your consent (where applicable), provided that we are not legally required or otherwise permitted to continue to hold such data. We may retain your personal data for an additional period to the extent deletion would require us to overwrite our automated disaster recovery backup systems or to the extent we deem it necessary to assert or defend legal claims during any relevant retention period, including, but limited to, an investigation of a HIPAA-related incident or breach.

## **Your rights regarding your personal data**

In addition to your rights under applicable data protection legislation and where we are permitted or required by applicable law and, we will provide you, upon request, with a copy of your personal data and we will correct any errors identified by you. Except as set forth above, we will not use your data for any automated decision making or any profiling and you have the right to restrict our processing of your personal data as well as the right to lodge a complaint with supervisory authorities regarding the processing of your personal data. We will refrain from sending you marketing materials without your express consent and will also comply with your request to stop sending any such further communications. All such requests, or any questions or comments regarding this policy or our handling of your personal data, should be addressed to [personal.data@Prista.com](mailto:personal.data@Prista.com).

## **Updates**

This Privacy Notice was updated in May, 2018. We reserve the right to amend this Privacy Notice from time to time to reflect changing legal requirements or our processing and operational practices. Any such changes will be posted on this website and will be effective upon posting.