



Website Privacy Policy

PRIVACY STATEMENT:

Octagon Research Solutions, Inc. (Octagon) is committed to respecting the privacy of individuals. This includes protecting the confidentiality of records that could identify individuals and to safeguard personal information, which also includes sensitive personal information, individually identifiable health information, and protected health information, both in paper and electronic formats, contained in and processed at Octagon's facilities from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Octagon has implemented several privacy policies to ensure that personal information will be processed appropriately and in a manner consistent with any applicable privacy and confidentiality laws and regulatory requirements and standards, including, but not limited to, the principles of International Conference on Harmonization (ICH) good clinical practice (GCP) (2.11), Safe Harbor, the Health Insurance Portability and Accountability Act of 1996 (HIPAA), 45 CFR Part 164, and 21 CFR Parts 11, 50, and 56.

SCOPE:

This policy applies to all individuals that use Octagon's website and to all personal information received by Octagon in any format, including electronic, paper, or verbal. By using Octagon's website, you agree to the terms of this policy and consent to the collection, use, and disclosure of the information collected/submitted. If you do not agree to this policy, please do not use Octagon's website.

DEFINITIONS:

Personal Information: Any information or set of information that identifies, or could reasonably be used to identify, an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

Sensitive Personal Information: Any personal information specifying medical or health conditions; personal sexuality; racial or ethnic origin; political opinions; religious, ideological, or philosophical beliefs; or trade union-related views, activities, or membership; information on social security measures; or information on administrative or criminal proceedings and sanctions, which are treated outside pending proceedings. Additionally, Octagon will treat as sensitive any personal information received from a third party where the third party identifies and treats it as sensitive.

INFORMATION COLLECTED:

Octagon's website does not collect personal information except when that information is provided by you on a voluntary basis (e.g., requesting customer support, registering for webinars, submitting employment applications, requesting newsletters). This information is processed by Octagon in order to provide the services and/or information that you have requested. By providing personal information to Octagon via its website, you agree to receive future communications from Octagon.

COOKIES:

Octagon's website may employ 'cookies', which are small files stored on your computer that identifies users entering a website. These cookies allow Octagon's website to recognize different visitors to the website and to target visitor preferences and areas of interest while using the website, as well as allow Octagon to track patterns of website usage in order to improve the website. A cookie cannot read data off of a hard drive against your will, destroy files, send viruses, or read cookie files created by other websites. Usage of a cookie is not linked to any personal information while using Octagon's website.

Octagon's website may receive Internet Protocol (IP) addresses in the normal course of the operation of the website. An IP address is a number assigned to you by your Internet provider so you can access the Internet and is generally considered to be non-personally identifiable information because, in most cases, an IP address is dynamic (changes each time you connect to the Internet) rather than static (unique to your computer). Although Octagon may receive IP addresses, Octagon does not use them to identify you personally or disclose them to others.



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LINKS TO OTHER WEBSITES:

Octagon's website may contain links to other websites. Octagon cannot control what happens on those websites and Octagon's privacy policy does not apply to those websites. Octagon recommends that you always review the privacy policies of those websites that you visit.

CHILDREN'S PRIVACY:

Octagon's website is not intended for, or designed to attract, individuals under the age of 18. Octagon does not collect personal information from any individual that Octagon knowingly knows is under the age of 18.

PROCESSING:

Octagon will process personal information only in ways that are relevant and consistent with the purposes for which it was originally collected and intended or subsequently authorized by you, and as mandated for any legal requirements.

OPT OUT:

You may choose (opt out) not to provide personal information to Octagon in connection with using Octagon's website. Octagon will provide you the opportunity to choose (opt out) whether your personal information is to be used for a purpose that is incompatible with the purposes for which it was originally collected or subsequently authorized by you, or whether your personal information is to be disclosed to a non-agent third party. To opt out of providing personal information directly to Octagon, simply bypass or elect not to participate in the interactive areas of Octagon's website.

You may choose (opt out) of allowing Octagon to use cookie technology to facilitate use of Octagon's website by making adjustments to your browser. Users who disable their Web browsers' ability to accept cookies will still be able to browse our Web site.

To be removed from Octagon's contact lists and from receiving additional information (e.g., newsletters, press releases, additional information regarding services/products), select the "Unsubscribe" link that is included on all subsequent communications.

OPT IN:

For sensitive personal information, Octagon will provide you the opportunity to affirmatively or explicitly choose (opt in) whether to provide sensitive personal information, whether your sensitive personal information is to be used for a purpose that is incompatible with the purposes for which it was originally collected or subsequently authorized by you, or whether your sensitive personal information is to be disclosed to a non-agent third party.

ACCURACY:

Octagon will take reasonable steps to ensure that personal information is reliable for its intended use, accurate, complete, and current.

ACCESS:

Octagon will provide you with reasonable access to your personal information to be able to correct, amend, or delete personal information where it is demonstrated to be inaccurate or incomplete, except where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated.



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DISCLOSURE:

Internal Disclosure:

Octagon will provide access to personal information only to those staff members who reasonable need such access to perform their assigned job responsibilities/functions.

External Disclosure:

Octagon may use agents (third parties that perform tasks on behalf of and under the instructions of Octagon) to process personal information. Octagon will provide those agents with only the personal information necessary in order to meet business or legal requirements. Octagon does not give or sell personal information to non-agent third parties.

Agents that processes personal information on behalf of Octagon must have a written agreement in place that incorporates appropriate contractual provisions to bind the agent to comply with all applicable privacy and confidentiality laws and regulatory requirements and standards, and requiring that the agent provide at least the same level of privacy protection as required by this policy. Agents may be required to undergo a pre-certification privacy assessment, as well as periodic privacy assessments.

Octagon reserves the right to disclose all personal information collected by Octagon to the extent required by law or to respond to judicial processes.

SECURITY:

Octagon will take reasonable precautions to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction. This includes maintaining computer equipment, networks, programs, and documentation to high security standards and restricting access to equipment and information to appropriate staff. Security will be proportional to the sensitivity of the personal information being protected.

Octagon will ensure that the transfer of any personal information to agents is performed via the most secure means practicable and proportional to the sensitivity of the personal information being transferred.

RETENTION AND ARCHIVING:

Octagon will retain and archive personal information in an appropriate manner consistent with applicable filing and archiving processes, as well as any applicable privacy and confidentiality laws and regulatory requirements and standards.

DESTRUCTION:

Octagon will destroy personal information in an appropriate manner consistent with applicable information and data security processes.

TRAINING:

All Octagon Staff Members processing personal information will be provided with appropriate training to ensure that they are fully aware of their responsibilities with respect to the protection of personal information.

SAFE HARBOR:

Octagon has voluntarily self-certified to, is committed to, and adheres to the Safe Harbor Privacy Principles in order to meet the requirements for the protection of personal information transferred from the European Union or Switzerland to the United States. Information regarding Safe Harbor, as well as Octagon's certification status, can be found at



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<http://www.export.gov/safeharbor/index.asp>. Octagon's Safe Harbor policy can be found at Octagon's website (<http://www.octagonresearch.com>).

COMPLIANCE:

Octagon will implement processes to ensure and monitor compliance with this policy.

Failure of an Octagon Staff Member to abide by the requirements/standards set forth in this policy will result in disciplinary actions, which may include, but are not limited to, issuance of a warning, suspension, immediate termination of employment, and/or legal proceedings.

INQUIRIES AND COMPLAINTS:

Any questions, complaints, access requests, comments regarding this policy, or the reporting of any inappropriate disclosure or use of personal information, should be directed to Octagon's Privacy Officer. Octagon will investigate and attempt to resolve any complaints and/or disputes regarding the processing of personal information in accordance with the principles of this policy.

CHANGES TO THIS POLICY:

Octagon will regularly review this policy to ensure that it provides an appropriate level of protection for personal information. Octagon reserves the right to amend this policy from time to time to ensure that it is current with any applicable privacy and confidentiality laws and regulatory requirements and standards. Appropriate notice will be given concerning such amendments, including the timely posting on Octagon's website. Please check back periodically for updates to this policy. This policy was last updated on 27 May 2009.

CONTACT INFORMATION:

Octagon Research Solutions, Inc.

Attn: Privacy Officer

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Wayne, PA 19087 USA

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