



## Privacy Policy

### Privacy Commitment

This Privacy Policy applies to all websites developed and maintained by TEUTEBERG, INCORPORATED. You are responsible for carefully reading this Privacy Policy in its entirety. This Privacy Policy describes the information we collect about you and how we keep your personal information safe and confidential.

TEUTEBERG, INCORPORATED understands that privacy is important to you. The information that we collect about you from our websites will be maintained and used in accordance with this Privacy Policy and applicable laws, rules and regulations.

By providing us with your Personally Identifiable Information (as defined below), including Personal Health Information (as defined below), you consent to the collection and use of any information you provide in accordance with this Privacy Policy.

TEUTEBERG, INCORPORATED may share information among its subsidiaries and third parties working with or on behalf of TEUTEBERG, INCORPORATED, and such information shall be protected in accordance with the terms of this Privacy Policy.

### Information We Collect

Unless TEUTEBERG, INCORPORATED has received your consent, the only information we collect will be information through the use of Cookies (as defined below), Web Logs (as defined below), or IP Address (as defined below). We will only collect Personally Identifiable Information (as defined below) including Personal Health Information (as defined below) after asking you for your consent.

### Cookies

We collect basic data about your use of our website through the use of Cookies. A Cookie is a small piece of information that our server sends to your web browser when you access our websites. Every computer that accesses our websites is assigned a different Cookie by TEUTEBERG, INCORPORATED. Cookies are capable of storing many types of data. Cookies may be used to help us analyze usage of our websites or to restrict underage use of the website. We do not link basic data from Cookies to Personally Identifiable Information without your permission and we do not use Cookies to collect or store Personal Health Information about you.

Most browser software can be set to reject all Cookies. Note, however, that some portions of our websites may not work properly if you reject Cookies.

### IP Addresses

We may also receive IP addresses in the normal course of the operation of our website. An IP address is a number assigned to you by your Internet service provider so you can access the Internet. Although we do receive IP addresses, we do not use them to identify you personally or disclose them to others.

## Web Logs

TEUTEBERG, INCORPORATED uses standard Web Logs that record basic data about your visit to our websites, such as the date and time of the visit, the pages viewed during the visit and the domain name of your Internet service provider.

We do not normally seek to identify individuals from Web Logs. However, we may use Web Logs to identify an individual whom we suspect tried to damage our websites or use them in an unauthorized way. We may share our Web Logs with law enforcement agencies if we believe there has been a violation of computer security or related laws. In addition, we may share our Web Logs (which do not contain any Personally Identifiable Information) with our partners to assist them in better designing their websites for clinical research studies.

## Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google") which uses cookies to help the web team analyze how users use the site. The information generated by the cookies about your use of the website (including your IP address) will be transmitted to and stored by Google under their privacy policies:

Google: <http://www.google.com/intl/en/analytics/privacyoverview.html>

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of your information by Google in the manner and for the purposes set out above.

## Personally Identifiable Information for Clinical Research Studies

Personally Identifiable Information that may be collected via a clinical research study survey is information that can be traced back to an individual. Personal Health Information is a combination of your Personally Identifiable Information with known health characteristics. For example, if you indicated that you have a certain disease or condition, when that information is combined with your name, it becomes Personal Health Information. Examples of Personally Identifiable Information include your name, home address, telephone number, email address, date of birth, and any other information that is linked to this identifying information.

We will use the Personally Identifiable Information and Personal Health Information that you provide to determine if you may be eligible for study participation. You are responsible for ensuring the accuracy of the Personally Identifiable Information and Personal Health Information you submit to TEUTEBERG, INCORPORATED. Inaccurate information will affect our ability to properly determine if you may qualify to participate in a study.

While you may view some of our study websites without providing Personally Identifiable Information, this information will be required to be considered for participation in a study.

## Use and Disclosure of Personally Identifiable Information

We will not use or disclose Personally Identifiable Information or Personal Health Information of users of our clinical research study websites for any purpose other than those described in this Privacy Policy. If these uses change at any time, we will update the privacy policy on our websites. We only use and disclose data obtained from users in the following ways:

- **COMMUNICATION WITH REGARD TO STUDY REFERRAL AND/OR PRE-QUALIFICATION**  
Personally Identifiable Information will be used by TEUTEBERG, INCORPORATED to follow-up with the clinical study site about your pre-qualification for the study.
- **SHARING INFORMATION WITH STUDY SITES**  
TEUTEBERG, INCORPORATED may forward Personally Identifiable Information and Personal Health Information to the study site running the clinical research study of interest.
- **AGENTS AND SERVICE PROVIDERS**  
We sometimes employ other companies and individuals to perform functions on our behalf. They may need access to your personal information to perform their functions. Types of companies used are IT managed services companies who perform IT services on our behalf.

## Aggregate Data

We will combine the information you provide with information from other visitors to our websites to create Aggregate Data which does not contain any uniquely identifying information. We will share this Aggregate Data with the sponsors of our websites, and/or its consultants. We will periodically analyze this Aggregate Data and use what we learn to make improvements to our websites. We may also share this Aggregate Data with our partners to assist them in better designing their websites.

## Children's Privacy

We are committed to protecting the privacy of children. Neither TEUTEBERG, INCORPORATED, nor any of its services, are designed or intended to attract children under the age of 13. We do not collect Personally Identifiable Information from any person we actually know is under the age of 13.

## Data Security

We maintain technical, physical, and organizational procedures to safeguard Personally Identifiable Information and Personal Health Information against unauthorized or unlawful processing and/or against accidental loss, alternation, disclosure or access.

## Sharing Information with Third Parties

We may be required to disclose Personally Identifiable Information and Personal Health Information to comply with a law or regulation, or in response to a search warrant, subpoena, or court order. In the event that we are legally compelled to disclose your Personally Identifiable Information or Personal Health Information to a third party, we will attempt to notify you, unless doing so would violate the law or court order. Disclosures may also be appropriate to protect our legal rights, to protect the security or integrity of our websites, to take precautions against liability, or during emergencies if physical safety is believed to be at risk. These types of disclosures are unlikely to occur, but we want you to be aware that they are

possible. In certain situations, we may also be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## Links to Other Websites

Our websites may contain links to other websites. Please keep in mind when you access websites operated by other parties, whether through links on our website or otherwise, that we do not control what happens on those websites. You should always check the privacy policy of the website you are visiting in order to be sure you know how the operator of that website will collect information from you and what the operator of that website will do with the information.

## Internet Transmission Risks

We acknowledge that no internet transmission is ever 100% secure or error free. It is your responsibility to ensure that the computer you use is adequately secured and protected against malicious software, Trojan horses, computer viruses and worm programs. Without adequate security measures on a computer, there is a risk that the information you provide could be disclosed to unauthorized third parties. Similarly, despite TEUTEBERG, INCORPORATED's efforts to protect your Personally Identifiable Information and Personal Health Information, there is always some risk that an unauthorized third party may find a way around our security systems or that transmissions of your information over the internet may be intercepted.

## Access Rights

TEUTEBERG, INCORPORATED provides you with reasonable access to the Personally Identifiable Information and Personal Health Information that we maintain about you. Subject to any legal requirements, you are given a reasonable opportunity to correct, amend, or delete information that is inaccurate. You may do so by contacting the Privacy Contact as set forth below.

## Change Notification

As privacy laws and regulations evolve, it may be necessary to revise or update our Privacy Policy without notice. You can determine if this Privacy Policy has been revised since your last visit by referring to the "last updated" legend at the bottom of this page. Your use of our websites constitutes your acceptance of the terms of the revised Privacy Policy, and you should therefore review the Privacy Policy regularly to ensure that you are aware of its terms. Please print, save, and retain a copy of the Privacy Policy (and of any revised version) for your records.

## Retention of Personally Identifiable Information and Personal Health Information

We will only maintain Personally Identifiable Information and Personal Health Information for as long as we are required to do so by applicable law(s), or for as long as necessary for the purpose(s) for which it is processed. We will delete Personally Identifiable Information and Personal Health Information when it is no longer needed and, in any case, upon the maximum storage term set forth by applicable law.

## EU-US and Swiss-US Privacy Shield Frameworks

TEUTEBERG INCORPORATED complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from European Union and Switzerland to the United States, respectively. TEUTEBERG INCORPORATED has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, TEUTEBERG INCORPORATED is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the Privacy Shield Frameworks, EU and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to [info@teuteberg.com](mailto:info@teuteberg.com). If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [info@teuteberg.com](mailto:info@teuteberg.com).

TEUTEBERG INCORPORATED's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, TEUTEBERG INCORPORATED remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless TEUTEBERG INCORPORATED proves that it is not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, TEUTEBERG INCORPORATED commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact TEUTEBERG INCORPORATED at:

TEUTEBERG INCORPORATED

Attn: Privacy Officer  
12200 W. Wirth Street  
Wauwatosa, WI 53222  
[info@teuteberg.com](mailto:info@teuteberg.com)  
[\(414\)-443-3280](tel:(414)443-3280)

TEUTEBERG INCORPORATED has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit

[www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

## Privacy Contact Information

Questions or comments regarding this Privacy Policy or our practices should be submitted to:

TEUTEBERG, INCORPORATED  
Attn: Privacy Specialist  
12200 W. Wirth Street  
Wauwatosa, WI 53222  
[info@teuteberg.com](mailto:info@teuteberg.com)

## Reservation of Rights

TEUTEBERG, INCORPORATED reserves the right to share an individual's information as required by law or to duly authorize information requests of government authorities.

*By providing us with your Personally Identifiable Information, including Personal Health Information, you consent to the collection and use of any information you provide in accordance with the above purposes and this Privacy Policy.*

This Privacy Policy was last updated on August 1, 2018.