

# CLINGROUP

## Introduction

- Our Privacy Policy will help you to understand what information we collect and process coming to CGH staff through different communication channels; how we protect and use it, and what choices you have about your personal data.
- When we refer to CGH within this Privacy Policy, we are referring to ClinGroup Holding, whose principal place of business is ClinGroup Holding, Ground floor, Renno Building, 204 General Francois Zein Street, Hazmieh, Lebanon, P.O. Box: 116-5262 Sami Solh – Beirut
- WHEREAS ClinGroup, a full service CRO offering Clinical Research, Regulatory affairs, pharmacovigilance consultancy, Patient Support Programs, Healthcare digital solutions, Accredited Trainings & Quality Audits & consultancy services for the pharmaceutical, medical device and biotechnology industry and has strong market positions by its own, particularly in France, Lebanon, Egypt, UAE and Turkey , but also through a network of cooperation partners in other countries of the Middle East and Africa enjoys a wide recognition in Europe, Middle East, and Africa

## Data Protection Framework

- CGH is aligned our Privacy Policy with the EU General Data Protection Regulation (“GDPR”) which came into effect on 25th May 2018, and under any applicable Privacy Policy and/regulations for the countries CGH performs projects on its land physically or remotely.
- CGH has completed applicable Privacy Impact Assessments (also known as Data Protection Impact Assessments under GDPR) for activities related to its activities, and these are available upon request from the CGH Data Protection Officer ([DPO@Clingroup.net](mailto:DPO@Clingroup.net))

## Customer and Citizen Data

- You may decide to send us your personal information via this email ([DPO@Clingroup.net](mailto:DPO@Clingroup.net)) if you are seeking more information, and/or seeking to do business with CGH. Your decision to disclose your personal data is voluntary, and by doing so, you are taking an affirmative action by providing us with specific consent to use your personal data only for the purposes for which you have disclosed it to us.
- CGH may access and use your personal data only for the purposes for which you have submitted it to us to (a) provide information to you, (b) make contact with you, (c) provide services to you, or (d) maintain the operations and security of IT and computer systems services we provide to you. We will not use your personal information for any other purposes, unless we have your specific consent that permits us to do so.
- We will at all times handle and store your personal data in accordance with industry best practice aligned with ISO27001, the international standard for information security. This includes the activities and procedures undertaken by our own personnel and authorized third parties and the technical controls, which we have implemented to prevent unauthorized access, compromise or theft of information from our applications, supporting computer systems and premises.

## Sensitive Personal Data

- GDPR specifies a set of personal data categories which are “sensitive”, and which require special consideration by Data Controllers. CGH do not knowingly collect or process any sensitive personal data, and supporting Privacy Impact Assessments (also known as Data Protection Impact Assessments under GDPR) are available upon request from the CGH Data Protection Officer([DPO@Clingroup.net](mailto:DPO@Clingroup.net))

### **Children's Personal Data**

- CGH services are not directed to children under the age of 13. If you learn that a child under the age of 13 has provided us with their personal information without having parental consent, please contact the CGH Data Protection Officer ([DPO@Clingroup.net](mailto:DPO@Clingroup.net)) immediately so that we can take appropriate action.

### **Customer and Citizen Data Rights**

- As prescribed within data protection regulations, you have specific rights connected to the provision of your personal data to CGH using its services. These include your rights to request we:
  - confirm to you what personal data we may hold about you, if any, and for what purposes
  - change the consent which you have provided to us in relation to your personal data
  - correct any inaccurate or incomplete personal data which we may hold about you
  - provide you with a complete copy of your personal data for you to move elsewhere
  - stop the processing of your personal data, whilst an objection from you is being resolved
  - permanently erase all your personal data promptly, and confirm to you that this has been done
- (there may be reasons why we may be unable to do this)
- To contact CGH Data Protection Officer ([DPO@Clingroup.net](mailto:DPO@Clingroup.net)).

### **Website Cookies**

- This Clingroup.net website uses cookies to record log data. Cookies are small text files sent by us to your computer, and from your computer or mobile device to us each time you visit our website. They are unique to you or your web browser. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser session. Persistent cookies last until you or your browser delete them, or until they expire.
- We use cookies, which are not specific to your account but are unique and allow us to undertake website analytics and customization, among other similar things. We may use third-party cookies, for example, Google Analytics, and you may choose to opt-out of third-party cookies by visiting their website.
- You can control and/or delete cookies as you wish. You may delete all cookies that are already in your computer and you may set most browsers to prevent cookies from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. Browser manufacturers provide help for cookie management in their products.

### **External Links**

- This Clingroup.net website may include relevant hyperlinks to external websites not controlled by us. Whilst all reasonable care has been exercised in selecting and providing any such links, you are advised to exercise caution before clicking any external links. We cannot guarantee the ongoing suitability of external links, nor do we continually verify the safety or security of the contents, which may be subsequently provided to you. You are advised, therefore, that your use of external links is at your own risk and we cannot be responsible for any damages or consequences from your use of them.

**Changes to this Privacy Policy**

We may change this CGH Privacy Policy from time to time; you are encourage to contact CGH DPO at ([DPO@Clingroup.net](mailto:DPO@Clingroup.net)) for the latest version of this policy. If you did not raise any concern and/or inquiry to those changes before they come into effect, you will have agreed to the revised policy.

**Contacting CGH**

If you have any questions about this Privacy Policy, would like to exercise any of your statutory rights, or to make a complaint, please write to:

**The Data Protection Officer**

ClinGroup Holding

Ground floor, Renno Building

204 General Francois Zein Street, Hazmieh, Lebanon

P.O. Box: 116-5262 Sami Solh – Beirut

Email: [DPO@clingroup.net](mailto:DPO@clingroup.net)