

MANA RBM Privacy Policy

MANA RBM is committed to protecting and preserving your privacy. This “*MANA RBM Privacy Policy*” provides information about how we process any personal data we collect from you, that you provide to us, or that we obtain about you in connection with your involvement with the MANA RBM as 1) a subject in a clinical trial, 2) employees, contractors, imaging sites, sponsors, vendors, suppliers, or business partners, or 3) individuals who access MANA RBM websites or engage in email or other electronic communications with MANA RBM for the purposes of commercial interest or personal communications.

The purpose of this “*MANA RBM Privacy Policy*” is to describe the MANA RBM policies and standards for complying with the European Union’s (EU’s) General Data Protection Regulations (GDPR) that are relevant to MANA RBM and to your personal data if you are located within the European Economic Area (EEA). We follow the following principles to ensure that your personal data is reliable for its intended use, and is accurate, complete, and current. Your personal data must be:

- Processed lawfully, fairly and in a transparent manner to you.
- Collected only for specified, explicit, and legitimate purposes, and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary for those purposes.
- Accurate and up to date, as necessary.
- Stored for no longer than is necessary for the intended purposes; and
- Secure and protected from accidental or unlawful destruction, loss, alteration, unauthorized access, or disclosure.

Data Processing on Behalf of Sponsors of Clinical Trials - Subjects

MANA RBM typically serves as a specialized data processor for data from in clinical studies involving research subjects. In the course of this business activity, it is necessary for us to access, collect, process, use, transmit, disclose, store, and otherwise handle personal data from these data subjects on behalf of clinical trial sponsors, who are usually pharmaceutical, biologics, or medical device researchers that are monitored by regulatory agencies, such as the Food and Drug Administration (FDA) in the U.S. and the European Medicines Agency (EMA) in the EU. When these processing activities are subject to the GDPR we will be acting as “data processors” as directed in a data processing agreement with the sponsor, who is acting as a GDPR “data controller.”

The personal data that we process about you, if you are a clinical trials research subject, includes demographic information about you and measurements and clinical assessment data. We typically do not collect your name or other identifying information such as email address, telephone number, or postal address. In specific instances, if you agree and

provide consent, we collect telephone numbers if you want to receive text notifications concerning your research study activities.

Clinical trial sponsors determine the means and purposes of such processing activities, including the personal data that will be collected, how that data will be used and by whom such data is accessed, and how long the data will be retained. The processing of your personal data in connection with such clinical trials can be found in the information provided to you by the clinical trial sponsor, including the Informed Consent Form (ICF) that was reviewed and acknowledged by you prior to your entry into the clinical trial. Please note that you must contact the sponsor if there are any questions or requests regarding your personal data, since they serve as the Data Controller.

Data Processing related to Clinical Trials – Non-Subject

When MANA RBM collects personal data on data subjects that are not in a clinical trial, such as personal data of MANA RBM employees and contractors, sponsor representatives, and MANA RBM or sponsor vendors, suppliers, and business partners, the relationships between MANA RBM and these data subjects are defined in contractual agreements. The processing and control of this personal data by MANA RBM is intended to establish and manage our contractual relationships with these parties. These contractual agreements specify the limited use and disclosure of your personal data when we access, collect, process, use, transmit, disclose, store, and otherwise handle personal data for these contracted purposes. Please note that MANA RBM may be forced to disclose your personal information when compelled by a lawful request made by a recognized public authority or where required to meet national security and or law enforcement requirements.

The personal data that we may collect and process about sponsor employees, contractors, vendors, investigator sites, and sponsor representatives, and MANA RBM vendors, suppliers, and business partners includes names, positions, email addresses, telephone numbers, and postal addresses. We do not collect health information about these individuals.

Data Processing of Personal Data from MANA RBM Website and Electronic Communication

When individuals access MANA RBM websites or engage in email or other electronic communications for the purposes of commercial interest or personal communications, we automatically and manually collect and process personal data from the website user or the individual who communicates with us. The personal data that we may collect, and process includes your name, job title, company name, email address, telephone number, postal address, and details about the use of the website, such as the date and time of access and records of the actions you performed while using the website. Note that some parts of our websites may use cookies and other technologies to collect this information about your internet usage. We will also collect and retain the information that you

voluntarily provide to us when you communicate with us for any reason. MANA RBM may use this personal data to respond to your requests for information about MANA RBM or its services.

If you voluntarily use this MANA RBM website, you consent to the use of information that you provide us in accordance with this Privacy Policy. Your continued access of the MANA RBM website will be deemed your agreement that your personal data may be used in accordance with this policy. By providing your personal information to MANA RBM in an electronic communication, you agree to the terms of this Privacy Policy and to receive electronic, telephone, and postal communications from MANA RBM. By voluntarily accessing and using this MANA RBM website and sending electronic communications, you agree that you have read and understood this Privacy Policy and that you accept and consent to the privacy practices and uses, retention, or disclosures of information about you.

Personal data security controls and systems have been designed and implemented to be accessed only by authorized and trained personnel. MANA RBM will not trade, sell, release, share or transfer your personal data for any use outside the MANA RBM organization or processes without your consent, or in a form other than what was disclosed to you at the time the information was collected, unless permitted or required by law. MANA RBM takes reasonable measures to maintain the confidentiality of your personal data regardless of the country where such information is stored or transferred.

Personal Data Protection and Access Rights

In accordance with applicable data protection and privacy laws, and where contractual commitments require, MANA RBM ensures that you can expect all relevant data privacy, protection, and access rights, including, but not limited to, notification of our privacy policies, your rights of choice and consent or to withdraw consent at any time, to request access to specific information, to request personal data correction or deletion, to request a copy of personal data in a common digital format (e.g., PDF), and to be notified about a suspected or actual breach of your personal data.

Notification of Privacy Policy – Access to request a copy of “*MANA RBM Privacy Policy*” is published on the MANA RBM website (<http://MANA.RBM.com/privacy>) to provide you with information on how MANA RBM handles and processes your personal data if you are a data subject in a clinical trial; for your personal data if you are an MANA RBM employee, contractor, or sponsor representative, or a member of an MANA RBM or sponsor vendor, supplier, or business partner; and for your personal data if you voluntarily access MANA RBM websites or engage in email communications with the MANA RBM for the purposes of commercial interest or personal communications.

Data Subject Choice and Consent Rights – If you are a clinical trial data subject, the ICF that was provided to you prior to participation in a sponsored clinical trial provided you with the data privacy notification from the sponsor and documentation of your consent to participate in the clinical trial under the stated conditions, including the purpose, use,

confidentiality of information, and your rights as a data subject, which includes withdrawal from participation in the clinical study. MANA RBM is not involved in the ICF process.

If you are not involved in clinical trial, you have rights of choice and consent as defined in contractual agreements with the MANA RBM and in this *“MANA RBM Privacy Policy.”* If you are located in the EU and if contractual agreements do not adequately cover your consent for the MANA RBM to collect and process your personal data, you can request that your consent (or your subsequent withdrawal of consent) be documented on a *“Data Subject Consent Form”* or *“Data Subject Consent Withdrawal Form”* by contacting the MANA RBM via email to Data Privacy Officer@manarbm.com

Collection and Access to Specific Information - When MANA RBM serves as a data processor in a sponsored clinical trial, your personal data is typically collected from a third-party, such as an investigator site in a clinical study. You have the right to request that we disclose information to you about our collection and processing of your personal data. If you are a clinical trial data subject or patient, you must contact the investigator site or the clinical trial sponsor to learn how you can access your personal data since MANA RBM does not possess the required information to identify you. If you are not a clinical trial data subject, you can request access to your personal data using a *“Data Subject Access Request Form”* that can be requested from the MANA RBM via email to Data Privacy Officer@manarbm.com. Once we receive your written request and confirm your identity, we will disclose to you the information that we possess.

MANA RBM must maintain the accuracy, integrity, confidentiality and relevance of your personal data based on the stated processing purposes. Adequate security mechanisms designed to protect personal data must be used to prevent your personal data from being stolen, misused, or abused, and prevent personal data breaches. If MANA RBM uses a third-party supplier or business partner to process your personal data on its behalf, the third-party data processor will follow established MANA RBM security standards and supplier evaluation requirements to assure that the contracted third-parties adequately safeguard your personal data in a manner that is appropriate to the associated risks.

Deletion and Correction Request Rights – You have the right to request that personal data that MANA RBM possesses about you be deleted or corrected if it is incorrect. If you are a clinical trial subject or patient, you must contact the investigator site or the clinical trial sponsor to learn how you can exercise these rights. If you are not a clinical trial data subject, you have the right to request a *“Data Subject Access Request Form”* via email to Data Privacy Officer@manarbm.com to formally request that MANA RBM delete or correct any of your personal data that we collected from you and retained, subject to certain exceptions or requirements in a contractual agreement. Once we receive your request and confirm your identity, we will delete or correct your personal data in our records, unless an exception or other requirement applies. If an exception applies, you will be notified that the data will not be deleted, along with specific information about the basis for the exception.

If you submit a request to correct, amend or delete your personal data records, the MANA RBM must ensure that your request is handled within a reasonable time frame. If you are a clinical trial participant, since the information necessary to identify you is not collected or maintained by us, you must first communicate with the clinical trial investigator site and/or sponsor to correct, amend, or delete your records, and the sponsor must then communicate the request to MANA RBM. MANA RBM must record all of the actions to delete personal data in a *“Log of Destroyed Personal Data Records.”*

Data Portability Rights – You have the right to receive a copy of your personal data in a structured electronic file format such as Adobe PDF, and/or to transmit those data to a designated recipient at no cost to you. If you are a clinical trial participant, you must first contact the investigator site or the clinical trial sponsor to learn how you can exercise these rights. If you are not a clinical trial data subject, you have the right to request a *“Data Subject Access Request Form”* via email to Data Privacy Officer @manarbm.com to formally request that MANA RBM provide you or a designated recipient with a copy of all of your personal data in an electronic format. There is no charge for the personal data access and transfer actions, and such requests must be processed within one month. The release of the personal data to you or your designate will be documented on a *“Data Subject Disclosure Form.”*

Data Breach Notification Rights – You have the right to be notified about a suspected or actual breach of security of your personal data. If you are a clinical trial data subject located in the EU, the sponsor of the clinical trial is responsible for determining whether there is a likely risk to your rights and freedoms as a data subject and for notifying you and the designated EU authority. If you not a clinical trial data subject and if MANA RBM identifies a suspected or actual personal data security breach, MANA RBM must perform an internal investigation, properly report the incident, and take appropriate remedial measures in a timely manner, including notifying you as an affected data subject using the *“Data Breach Notification Form – Data Subject.”* MANA RBM will record the data breach incident information into the *“Register of Data Breaches”*, which will be maintained in the MANA RBM records archives and reviewed and updated annually.

Communication with MANA RBM

To communicate directly with us, please send an email to Data Privacy Officer@manarbm.com or MANA RBM, Data Privacy Officer, 1401 Wewatta Street, Unit 813, Denver, CO 80202.

ROLE	SIGNATURE	DATE
Author:	<i>Penelope Manasco, M.D.</i>	11/21/2022
Reviewed by:	<i>[Signature]</i>	11/21/2022
Approved by:	<i>Penelope Manasco, M.D.</i>	11/21/2022

VERSION NUMBER	AUTHOR	CREATION/ MODIFICATION DATE	DESCRIPTION OF MODIFICATION
1.0	Penelope Manasco, M.D.	21 NOV 2022	Initial Document

SIGNATURE CERTIFICATE





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TRANSACTION DETAILS	DOCUMENT DETAILS
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SIGNERS

SIGNER	E-SIGNATURE	EVENTS
<p>Name Everett Lambeth</p> <p>Email elambeth@manarbm.com</p> <p>Components 2</p>	<p>Status signed</p> <p>Multi-factor Digital Fingerprint Checksum 1a4d2599aa391464f18674ea51ba6e335a2ecf6c5787b16066ed8f36d351b481</p> <p>IP Address 70.191.173.226</p> <p>Device Chrome via Windows</p> <p>Drawn Signature </p> <p>Signature Reference ID B9B4D90D</p> <p>Signature Biometric Count 315</p>	<p>Viewed At 11/21/2022 10:21 CST</p> <p>Identity Authenticated At 11/21/2022 10:22 CST</p> <p>Signed At 11/21/2022 10:22 CST</p>
<p>Name Penelope K Manasco, M.D.</p> <p>Email pmanasco@manarbm.com</p> <p>Components 4</p>	<p>Status signed</p> <p>Multi-factor Digital Fingerprint Checksum 1ea6e9c7951fddea5e2beb58846af2a29d4b7ace00b5c94882a36fdcf2dee0c</p> <p>IP Address 68.96.36.202</p> <p>Device Safari via Mac</p> <p>Typed Signature </p> <p>Signature Reference ID F2EE4491</p>	<p>Viewed At 11/21/2022 09:26 CST</p> <p>Identity Authenticated At 11/21/2022 09:27 CST</p> <p>Signed At 11/21/2022 09:27 CST</p>

AUDITS

TIMESTAMP	AUDIT
11/21/2022 09:06 CST	Everett Lambeth (elambeth@manarbm.com) created document 'mana_data_privacy_policy_v1_0_21nov2022.pdf' on Chrome via Windows from 70.191.173.226.
11/21/2022 09:06 CST	Penelope K Manasco, M.D. (pmanasco@manarbm.com) was emailed a link to sign.
11/21/2022 09:26 CST	Penelope K Manasco, M.D. (pmanasco@manarbm.com) viewed the document on Safari via Mac from 68.96.36.202.
11/21/2022 09:27 CST	Penelope K Manasco, M.D. (pmanasco@manarbm.com) authenticated via email on Safari via Mac from 68.96.36.202.
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