



Houston Research Institute Website Privacy Notice

Effective: 2022

Houston Research Institute (“HRI”, “we”, “our”, or “us”) is an integrated research organization primarily servicing the biopharmaceutical industry and the parties engaged in that industry, and we are committed to safeguarding the privacy of information we collect, including compliance with applicable Data Privacy Laws, like the European Union’s General Data Protection Regulation (GDPR), and the California Consumer Privacy Act (CCPA), amended and strengthened by the California Privacy Rights Act (CPRA) of 2020. Our website and other services are primarily provided on behalf of businesses. Our website and other services are not intended for individuals to use for personal or household purposes.

This Privacy Notice outlines the collection, use, and disclosure of Personal Data provided to Houston Research Institute by individuals through the Houston Research Institute website (hereinafter “Information Providers”).

When Personal Data are submitted to Houston Research Institute or you use Houston Research Institute websites and other electronic data services, you implicitly consent to the collection, use, and disclosure of that information as described in this Privacy Notice. We will seek your explicit consent before processing your Personal Data, as and where required by applicable laws.

Exclusions: This notice only addresses Personal Data collected through our websites, mobile pages, and applications (collectively, “Services”) that post this Privacy Notice. It does not describe the ways in which we may collect or use Personal Data obtained offline in other ways and does not cover Personal Data concerning our employees, contractors, and service providers, collected and stored in the course of our business. Such data processing is covered in our Global Corporate Privacy Policy. This notice also does not address or control the privacy practices of other websites (including those we link to), which may have their own privacy notice(s). We encourage our website users to be aware when they leave our website and to read the privacy statements of each and every website they visit that collects Personal Data.

This notice is organized into the following sections - please select your desired topic for further information:

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INTRODUCTION

“Personal Data”, as used herein, refers to data created by or provided to Houston Research Institute by or about an Information Provider that can be used to identify or relate to you as an individual either directly or indirectly.

“Sensitive Personal Data”, as used herein, refers to Personal Data that can be considered to disclose sensitive information about an Information Provider’s race, gender, ethnic origin, religious affiliation, health data and criminal convictions, among other things.

At Houston Research Institute, it is our goal to handle your Personal Data in accordance with applicable laws, and in line with the following principles:

- Process Personal Data lawfully, fairly, and in a transparent manner.
- Collect Personal Data for a specified, explicit, and legitimate purpose and use it for the purposes for which it was originally collected.
- Limit collection of Personal Data to the extent necessary in relation to the purpose for which it is processed.
- Make reasonable efforts to ensure that your Personal Data are accurate and, where necessary, kept up to date.
- Store Personal Data for no longer than is necessary for the purpose for which the Personal Data are processed.
- Process Personal Data in a manner that provides adequate security and confidentiality.

Our privacy practices are described in greater detail in the remainder of this Privacy Notice.



PERSONAL DATA WE COLLECT

Houston Research Institute may use, collect and/or disclose Personal Data and Sensitive Personal Data for its legitimate business purposes, based on your express consent, or for other purposes and pursuant to legal basis as outlined further in this notice in the section '[Houston Research Institute's Use of Personal Data](#)'.

You may visit our website without voluntarily providing any information about yourself. However, depending on your interactions when you visit our website or otherwise interact with Houston Research Institute, we may collect the following details about you. We may also collect information about you in the ordinary course of business in the context of an existing business relationship, from our customers or from third parties:

Information that we receive by your voluntary submission:

- **Business & Contact details:** such as your name, social media handle, job title and employer, email address, mailing address, phone number, and emergency contact information.
- **Professional credentials:** such as your professional title, specialty, educational and professional history, and institutional affiliations.
- **Survey data:** such as your responses to our online and offline surveys.
- **Communications** that we exchange when you contact us.

Information we may receive from other sources:

- **Job applicants' details:** when you review and apply for open positions listed on our 'Careers' page, you are redirected to the job posting on the recruitment websites we partner with. Any information you submit is collected and governed by the policies of these websites. This includes business and personal contact information, professional credentials and skills, educational and work history, and relevant information included as part of your Resume. We receive applicant details once shortlisted profiles have gone through mandated background checks, if required, in the form of prospective employee information. Personal Data relating to this employee information are retained for the period of your employment, and thereafter in accordance with our Data Retention Policy.
- **Transaction history:** such as details about the programs and activities in which you have participated, including conferences, ad boards, speakers' programs, dinners and other events.
- **Publicly available information:** including information that you or others publish on social media and in publications, such as tweets, comments, news articles, or video or audio content.

Information collected by Automated means:

- **Usage information:** such as information about how you use the services and interact with us.
- **Device identifiers:** including information about the device you are using to visit and connect to our websites or applications, such as your device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, and other device identifiers.
- **Online activity data:** including clickstream data and other information about your interactions with our services, websites, applications, social media pages, and email communications. We, our service providers and business partners also collect this type of information over time and across third-party websites.



Houston Research Institutes Use of Personal Data

We may use the Personal Data we collect for the below listed purposes. Houston Research Institute collects, processes and discloses Personal Data and Sensitive Personal Data from and about Information Providers -

- only as necessary in the exercise of Houston Research Institute legitimate interests, functions and responsibilities as an integrated research organization.
- who are research subjects in the exercise of scientific, historical research, or statistical purposes.
- who are applicants for employment, in order to enter into or administer an employment relationship with Houston Research Institute.
- to share it with internal and external parties to qualify or work with and other related Houston Research Institutes processes and functions.
- to conduct general demographic and statistical research to improve Houston Research Institutes programs.
- to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.
- to protect our, your or others' rights, privacy, safety or property.
- to audit our internal processes for compliance with legal and contractual requirements and internal policies;
- to enforce the terms and conditions that govern our services;
- to prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft;
- Additionally, Houston Research Institute collects, processes and shares Personal Data from and about event patrons internally and with third parties for the purpose of management of your relationship and engagement with Houston Research Institute.

Houston Research Institute's disclosure to third parties and the basis for doing so have been explained further in the following section.



Disclosures to Other Parties

We may also disclose your Personal Data to other parties as follows:

- **Consent:** We may disclose your Personal Data if we have your consent to do so.
- **Emergency Circumstances:** We may share your Information and Sensitive Information when necessary to protect your interests and you are physically or legally incapable of providing consent.
- **Employment Necessity:** We may share your Sensitive Information when necessary for administering employment or social security benefits in accordance with applicable law, subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
- **Public Information:** We may share your Information and Sensitive Information if you have manifestly made it public.
- **Archiving:** We may share your Information and Sensitive Information for archiving purposes in the public interest, and for historical research, and statistical purposes.
- **Performance of a Contract:** We may share your Information when necessary to administer a contract you have with Houston Research Institute..
- **Legal Obligation:** We may share your Information when the disclosure is required or permitted by international, federal, and state laws and regulations.
- **Service Providers:** We use third parties who have entered into a contract with Houston Research Institute to support the administration of Houston Research Institute operations and policies. In such cases, we share your Information with such third parties subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure. Outside of a contract with Houston Research Institute, consumer information is not shared with third parties for marketing purposes.
- **Houston Research Institute's Affiliations:** With your consent, we may share your Information with parties that are affiliated with Houston Research Institute for the purpose of contacting you about goods, services, or experiences that may be of interest to you.
- **De-Identified and Aggregate Information:** We may use and disclose Information in de-identified or aggregate form without limitation and for any purpose



Children's Privacy

We are committed to protecting the privacy of children. This website's content and services are not intended for or designed to attract children under the age of 13 (or, in certain jurisdictions, 16). Accordingly, we do not knowingly collect or maintain personally identifiable information from any person we actually know is under the age of 13. If it comes to our attention that a user of our website is under the age of 13 (or 16, as applicable) and has volunteered Personal Data and/or health-related Personal Data or that a healthcare professional has volunteered Personal Data about a patient who is identified as younger than 13 (or 16, as applicable), without the given or authorized consent of the guardian of such child, we will promptly, upon relevant notification or request, endeavor to delete such Personal Data.

Security

Houston Research Institute uses commercially reasonable administrative, technical, personnel-related, and physical security measures designed to safeguard the Personal Data that you provide us and is in our possession against loss, theft and unauthorized use, disclosure, or modification. Of course, despite these measures, we cannot guarantee perfect security of the networks, servers, and databases we operate or that are operated on our behalf. In particular, email sent to or from the website may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to us via the website.



Cookies and Other Technology

Our website may employ cookies and similar technologies for website functionality and tracking user engagement. “Cookies” are small files that the website places on your hard drive for identification purposes. These files are used for website registration and for customization of your next time visit to our website. For example, cookies will remember your preferred language and display. Cookies cannot read data off of your hard drive.

We use the following cookies on our website:

- **Strictly necessary cookies:** These are cookies that are required for the operation of our website. They include, for example, cookies that enable page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Analytical cookies:** We use the Google Analytics platform to collect certain analytical information to help us better understand activity on our website and improve our services and the quality of our website. This information includes the IP address, page requests, referring websites or ads, operating system and browser, and time spent on our website. We receive this data in an aggregated form. We use this information to help us understand how visitors engage with our website, measure the effectiveness of our advertising on third-party websites, and to improve our visitors’ experience. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/.
- **Functionality cookies:** These are used to recognize you when you return to our website and to embed functionality from third party services. This enables us to personalize our content for you, remember your preferences (for example, your choice of language) and to integrate useful services provided by third party providers into our website.

When you visit the Houston Research Institute website for the first time, you will be given information about the technologies and cookies in use and will have the opportunity to set your consent preferences using a third-party WordPress plug-in. Thereafter, you can manage your cookie settings on our website by clicking on ‘Manage consent’ at the bottom right of the homepage. You may reject the use of tracking technologies in part or in full. By not accepting cookies, some features on our website may not fully function, and you may not be able to access certain information on this website.



Retention and Destruction of Your Personal Data

Your Personal Data will be retained by Houston Research Institute in accordance with applicable federal and state laws and regulations, and the applicable retention periods in the Houston Research Institute Records Retention Policy. Your Personal Data will be destroyed upon your request, unless applicable laws require destruction after the expiration of an applicable retention period. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your Personal Data given the level of sensitivity, value and criticality to Houston Research Institute.

Location-Specific Disclosure: Users in California, the European Economic Area (EEA), the UK, and Switzerland - and Consent to Transfer of Personal Data to the United States

This website is operated in the United States. If you are located anywhere outside of the United States, please be aware that information we collect, including Personal Data, will be transferred to, processed in, and stored in the United States or any other country in which we or our affiliates or processors maintain facilities. The data protection laws in the United States differ from those of the country in which you are located, and your Personal Data can be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States. By using our website or providing us with any information, you explicitly consent to the transfer, processing, and storage of your information in the United States. You further acknowledge that you have been informed of the possible risks of such transfers due to the absence of an adequacy decision by the European Commission with respect to transfers of Personal Data to the United States.

If you are a California resident, please read our '[California Consumer Privacy Notice](#)' for additional information that we are required by the California Consumer Privacy Act of 2018 (CCPA) to provide to you.

In certain circumstances, we may transfer the Personal Data of residents of the European Economic Area (EEA), the UK, and Switzerland. In such circumstances, we will ensure to have adequate transfer mechanisms and contracts in place, including the use of Standard Contractual Clauses, as mandated.

As an EEA, UK or Switzerland resident, you are entitled to the rights under Chapter III of the EU General Data Protection Regulation, and the UK GDPR, or Section 2 of the Swiss Federal Act on Data Protection with respect to the processing of your Personal Data, which include the right to access and rectify and to request erasure of Personal Data. In order to verify your identity, we may require you to provide us with the necessary details prior to accessing any records containing information about you.



Your Privacy Rights

You may have certain rights as a data subject under applicable laws. For example, you may have the right to object to or request restriction of processing of your Personal Data and to request access to, rectification, erasure and portability of the Personal Data we hold about you, subject to certain exceptions prescribed by law.

For instance, if you are a resident of the European Economic Area (EEA) or the UK - the GDPR, and similarly the UK GDPR, provides you the following rights in relation to your Personal Data for which Houston Research Institute is the Data Controller:

- **Right to be Informed**

The right to be informed allows individuals to know what Personal Data are collected about them, for what purpose, who is collecting it, how long will it be retained, with whom will this data be shared, and how you can file a complaint.

- **Right to Access**

Individuals have a right to submit Data Subject Access Requests (DSARs) and obtain Personal Data an organization has about them.

- **Right to Rectification**

The right to rectification allows the individuals to ask the organization to update any inaccurate or incomplete Personal Data the organization holds about them.

- **Right to Erasure**

Also known informally as the 'Right to be Forgotten', this right allows individuals to ask for their Personal Data to be deleted if:

- the Personal Data are no longer deemed necessary for the original purpose for which it was collected
- an individual withdraws consent
- the Personal Data have been unlawfully processed
- Individual objects to the processing and the Data Controller has no reason to continue processing
- data erasure is necessary for compliance with a legal obligation

- **Right to Restrict Processing**

Individuals can request that an organization limits the way it uses their Personal Data.

- **Right to Data Portability**

Individuals can also request for their data to be transferred directly to them or another organization

- **Right to Object to Processing**

Individuals can object to the processing of their Personal Data at any time or under certain circumstances (e.g., for marketing purposes).

- **Rights in relation to Automated decision making and Profiling**



Individuals have the right to not be subjected to automated decision-making if it is producing a legal effect that significantly affects them. Please note that Houston Research Institute does not engage in activities involving profiling and automated decision making and does not control or process Personal Data for this purpose.

Similarly, if you reside in California and have provided your Personal Data to us, you may exercise your rights under the California Consumer Privacy Act (“CCPA”). California residents can find more information by reading our [‘California Consumer Privacy Notice’](#).

If you would like to receive further information regarding our use of your Personal Data, or if you would like to exercise your rights, please contact us at info@houstonresearchinstitute.com, or in writing to us:

Data Protection Officer:
Houston Research Institute
1155 Dairy Ashford Rd. Suite 200
Houston, Texas 77079

We will attempt to fulfill your request to the extent required by and permissible under applicable privacy laws and other laws and regulations. In any event, we will endeavor to respond to you promptly and to advise you of the outcome of your request.

Please be aware that prior to processing or providing any information we will verify and may request further proof of your identity. Additionally, if you are acting on behalf of the data subject, written authorization along with proof of the data subject’s identity will be required. Houston Research Institute may not be able to comply with your request if we are unable to confirm your identity or connect the information you provide with Personal Data in our possession.

In certain jurisdictions, you may have the right to file a complaint with the relevant regulator or supervisory authority. Contact details can be found below:

- EU Supervisory Authorities: Should you have any concerns regarding the processing of your Personal Data, you may contact the national data protection authority in the EU jurisdiction in which you normally access our sites at. [EU – Data Protection Authorities](#)
- The Supervisory Authority in the UK is the Information Commissioner's Office, whose contact details are available at ico.org.uk.



Updates to This Privacy Notice

We may change or update this Privacy Notice from time to time by publishing a new version on this website. When we do update this Notice, we will revise the “Effective” date at the top of this page. Your continued use of the Houston Research Institute's website and third-party applications after any such change indicates your acceptance of these changes.