

Privacy Policy

DISCLAIMER: It is your right to be properly informed, but, sometimes, a Privacy Policy might seem not easy to read, understand and navigate. For this reason, ClinChoice, through colors, tables and the “easy navigate” links, ensures that reading this Privacy Policy is a pleasant experience.

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1. Why a Privacy Policy for you, users of our web site: **CLINCHOICE**

This **page** shows our **CLINCHOICE Privacy Policy**, describing the management of websites of **CLINCHOICE**, as regards processing the personal data of **you, as users that visit us via web**.

This **Privacy Policy** sets out how we, CLINCHOICE, use and protect any information that you give to us when you use our website and it constitutes an informative to the data subjects under the terms of Article 13 of the General Data Protection Regulation (GDPR) and Privacy Information Management System(s), where applicable.

This informative is provided to any entity having to do with the web-based services made available by CLINCHOICE via electronic networks as from the following addresses:

www.ClinChoice.com

which is the home page of our official websites (CLINCHOICE).

CLINCHOICE takes its users' privacy very seriously and undertakes to comply in full with the applicable laws and regulations (including applicable ISO requirements – hereinafter defined as the “**PIMS**” and EU General Data Protection Regulation (EU) 2016/679 – hereinafter defined as the “**GDPR**”).

CLINCHOICE is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this Privacy Policy.

2. Identification of the Controller and of the Data Protection officer (DPO)

The Data Controllers are **the legal entities part of CLINCHOICE International and are listed below**

- ClinChoice Inc. a company organized under the laws of Pennsylvania with registered office at 1300 Virginia Drive, Suite 408, Fort Washington, PA 19034, USA
- ClinChoice LLC a company organized under the laws of Armenia with registered office at 3 Barbusse Street, 0028 Yerevan, Armenia

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- ClinChoice Canada Inc. a company organized under the laws of Pennsylvania with registered office at 2 Robert Speck Parkway, Suite 750, Mississauga, Ontario L4Z 1H8, Canada
- ClinChoice Private Ltd. a company organized under the laws of India with registered office at #729 8th Main, 11th Cross, J.P. Towers, JP Nagar 3rd Phase, Bangalore – 560 076, Karnataka, India
- ClinChoice Limited a company organized under the laws of the United Kingdom with registered office at Suite G48, 268 Bath Road, Slough, SL1 4DX, Berkshire, United Kingdom
- ClinChoice Inc. a company organized under the laws of Philippines with registered office at 26th Floor Wynsum Corporate Plaza, 22 F. Ortigas Jr. Road, Ortigas Center, Pasig City, 1605, Philippines
- CROMSOURCE S.r.l., a company organized under the laws of Italy with registered office at Via Giorgio De Sandre 3, 37135, Verona, Italy;
- CROMSOURCE BV, a company organized under the laws of Belgium with registered office at Mechelsesteenweg 455 Bus 5, 1950, Kraainem, Belgium;
- CROMSOURCE GmBh, a company organized under the laws of Germany with registered office at Borchersstraße 20 – Etage B2 52072, Aachen, Germany;
- CROMSOURCE S.l.u., a company organized under the laws of Spain with registered office at Marqués de Urquijo 26 - 3º Izqda, 28008, Madrid, Spain;
- CROMSOURCE BV, a company organized under the laws of The Netherlands with registered office at Kingsfordweg 151, 1043 GR, Amsterdam, The Netherlands;
- CROMSOURCE Sp.z.o.o., a company organized under the laws of Poland with registered office at ul. Gen. Józefa Zajęczka 32, 01-510, Warszawa, Poland;
- CROMSOURCE Ltd., a company organized under the laws of Switzerland with registered office at Via Serafino Balestra, 18 6901 Lugano, Switzerland;
- CROMSOURCE Ltd, a company organized under the laws of England with registered office at 6-9 The Square, Stockley Park, Hayes, Uxbridge UB11 1FW, United Kingdom;

The above listed entities are jointly defined herein as “**CLINCHOICE**”.

The Global Data Protection Officer (“G-DPO”) can be contacted at the following address: data.protection@clinchoice.com

You can always contact us to receive more detailed information on how we process your data.

3. Rules for Privacy Policy updates

This policy is effective from 30-May-2024.

CLINCHOICE may change this Privacy Policy from time to time by updating this page.

You should check this page from time to time to ensure that you are happy with any changes.

You can determine if this Privacy Policy has been revised since your last visit by referring to the version and date in the header of each page.

If changes are particularly relevant, we will make a more visible notification.

Your use of our websites after any update of this Policy 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.

You can at any time exercise your rights, in particular the rights to unsubscribe/sign off or object to processing: please refer to the sections **“8. Your Rights”**.

4. Personnel authorized to process your data

Accesses to your data and to the tools processing them are at all times restricted to appropriately authorized personnel.

The personnel who receive your data shall perform processing as Data Controller, Data Processor, or otherwise authorized persons, as the case may be, for the purposes indicated below and in compliance with the applicable data protection law.

The information you provide to us will be available to CLINCHOICE, its affiliates and third parties working with or on behalf of CLINCHOICE.

CLINCHOICE may provide any or all collected information to a third party in connection with the sale, assignment, or other transfer of the business of the particular website to which the information relates if such third party agrees to treat all such information in accordance with this Privacy Policy.

CLINCHOICE may be obligated to disclose certain personal information data to third parties - such as Government Authorities, institutions, authorities, public bodies per local laws and regulations.

It may also be necessary to disclose personal information data to protect the legal interests and other rights of CLINCHOICE, subject to local legal requirements. CLINCHOICE reserves the right to disclose all information collected to the extent required by law or to respond to judicial process.

All the above-mentioned authorized personnel shall only receive the data necessary for their respective functions and shall duly undertake to process only for the purposes indicated above and in compliance with data protection laws. The data can furthermore be communicated to the other legitimate recipients identified from time to time by the applicable laws. With the exception of the foregoing, the data shall not be shared with third parties, whether legal or natural persons, who do not perform any function.

Except as set forth in this Privacy Policy, CLINCHOICE will not trade, sell, release, share or transfer your personal information for use by any business outside the CLINCHOICE organization 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.

Read in detail about authorized recipients of your data and places where your data are processed, including cross-border data transfers below.

→ to CLINCHOICE Inc. and its affiliates

To operate as a global business, it may be necessary to process and transfer personal data within CLINCHOICE businesses. All CLINCHOICE premises can be found in paragraph 2.

Persons belonging to the following categories are authorized to process the user's data: technical and administrative staff, IT staff, Business and Development personnel, Human resources, CLINCHOICE core business personnel, etc., as well as other staff members who require processing the data for performance of their job duties.

→ to third parties working with or on behalf of CLINCHOICE

It may be necessary to disclose certain personal information data to a supplier or contractor organization supplying services which require the use of personal data.

If you will be re-directed to other web sites/ third party web sites, you understand the destination web site is not under the control of ClinChoice and it uses a different privacy policy and cookie policy.

The data can be communicated, also in different countries, to professionals, independent consultants – working individually or in partnerships - and other third parties and providers which supply to the Company commercial, professional or technical services required to operate the Website (e.g., provision of IT and Cloud Computing services) for the purposes specified below and to support CLINCHOICE with the provision of the services you requested.

In particular, data will be disclosed to WP Engine Inc. 504 Lavaca Street, Suite 1000 Austin TX - USA; SageFrog Marketing Group LLC., 62 East Oakland Avenue, Doylestown, PA 18901 - USA; Greenhouse Software, Inc., 228 Park Avenue S. PMB 14744, New York, New York, 10003-1502 – USA; HubSpot Inc, 2 Canal Park, Cambridge, MA 02141-USA– appointed as Data Processor, in charge of the maintenance of the website and for the maintenance of the databases in which your data will be stored.

Data can be disclosed to third parties in the event of mergers, acquisitions, transfers of business -or branches thereof-, audits, or other extraordinary operations.

→ to other third parties

CLINCHOICE may be obligated to disclose certain personal data to third parties - such as Government Authorities, institutions, authorities, public bodies for their institutional purposes - also in different countries.

It may also be necessary to disclose personal information data to protect the legal interests and other rights of CLINCHOICE, subject to local legal requirements.

5. Places where your data are processed, including Cross-Border transfers

Personal data collected by CLINCHOICE's website may be stored and processed in any country where CLINCHOICE operates; all sites of CLINCHOICE shall process the collected information securely in compliance with the EU GDPR requirements and Privacy information system requirements, where applicable. By providing consent on CLINCHOICE's website, CLINCHOICE understands that transfer of information to countries outside the country of residence, including to the United States, is accepted by the user. In cases of onward transfers to third parties of individuals' data by CLINCHOICE, CLINCHOICE will be liable and responsible for data handling.

Regarding any transfer of data outside the European Economic Area (EEA), including in countries whose laws do not guarantee the same level of protection to personal data privacy as the EU Regulation, CLINCHOICE informs that the transfer shall in any event take place in accordance with the methods permitted by the EU GDPR, such as, for example, on the basis of the user's consent, on the basis of the Standard Contractual Clauses approved by the European Commission, by selecting parties enrolled in international programs for free movement of data (e.g. EU-US Data Privacy Framework) or operating in countries considered safe by the European Commission (EU Adequacy decision).

6. Data collected and lawfulness – CLINCHOICE website

When you contact CLINCHOICE via our websites to request or to access information, you are asked to provide your personal data.

CLINCHOICE will collect information through our websites that can identify you (if provided by you), such as, but not limited to, your name, surname, and job title, contact information including Company email, address, demographic information such as postcode, city, country, preferences and interests' other information relevant to customer surveys and/or offers.

CLINCHOICE can collect also other information (if provided by you) in the different modules for information collection: labels in the forms will transparently and unambiguously indicate which type of data we collect and if they are mandatory or not for providing the services required.

Data collection respects the data minimization: we will collect only your data if strictly connected to the service you are requesting.

CLINCHOICE may use this information to respond to your requests for information, products, or services. CLINCHOICE may also collect information that will usually not allow us to identify you, such as information gathered through "cookies" (see our [Cookie Policy](#)).

Data collection is legally based on any consent you will provide us based on the present informative.

Collection of data voluntary given by you sending messages to the addresses mentioned in this website for accesses our services, is done on the bases of your freely chosen explicit and voluntary decision to give us your data based on the present informative.

CLINCHOICE will process your data only in respect to the processing needs/scope detailed in this informative.

Whenever you contact CLINCHOICE's website, the IP Address is identified and logged automatically in CLINCHOICE's server along with the time of the visit and the pages that were visited. IP Addresses are used for administering the website and helping diagnose server problems. IP addresses are masked, where possible, according to the regulatory requirements. Retention of IP Addresses is done according to regulatory requirements.

Please read carefully the informative for each type of processing as detailed in the paragraphs below.

6.1 Informative for the Data Processing via “Contact us”, “RFI / RFP”, sections

Data Collected	CLINCHOICE collects, through this webpage, information that can identify you such as, but not limited to, your name, surname, contact information including Company email address demographic information such as postcode, city, country.
Data Collected – not mandatory	In the field marked as “not mandatory”, CLINCHOICE can collect also other information, such as messages, notes, files, and comments, but only if provided by you: CLINCHOICE will process all the information you will freely decide to write in the field marked as “not mandatory” such as, but not limited to preferences and interests.
Type of Processing	CLINCHOICE will process these data electronically and in paper as applicable.
Purposes of the processing	<p>CLINCHOICE process this information:</p> <ul style="list-style-type: none"> • to understand your needs and provide you with required information, if any • to provide you with a better service as well as improving our products and services. <p>We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.</p>

	<p>From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, or mail. We may use the information to customize the website according to your interests.</p> <p>Under these circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.</p>
Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	Data will be retained for a period (10 years) allowing CLINCHOICE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CLINCHOICE is subject, including any establishment, exercise, or defense of legal claims.
Authorized personnel	<p>The information you provide to us will be available to authorized CLINCHOICE personnel and its subsidiaries and to authorized parties working with or on behalf of CLINCHOICE to manage the enquiry.</p> <p>Please refer also to paragraph 4. Personnel authorized to process your data</p>
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including cross-border transfer
Rights	<p>You have the right to:</p> <ul style="list-style-type: none"> - request from the controller access to your data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability. - withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. - submit a complaint to a supervisory authority. <p>Please refer also to paragraph 8. Your Rights</p>

6.2 Informative for the Data Processing via “Locations” webpage

Data Collected	CLINCHOICE collects all the information freely given by you by contacting CLINCHOICE via phone, post mail and e-mail, using the CLINCHOICE contacts details reported in this section.
Data Collected – not mandatory	Not applicable
Type of Processing	CLINCHOICE will process these data electronically and in paper.
Purposes of the processing	<p>CLINCHOICE processes this information:</p> <ul style="list-style-type: none"> • to understand your needs and provide you with required information, if any • to provide you with a better service as well as improving our products and services. <p>We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.</p> <p>From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, or mail. We may use the information to customize the website according to your interests.</p> <p>Under these circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.</p>
Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	Data will be retained for a period (10 years) allowing CLINCHOICE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CLINCHOICE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	<p>The information you provide to us will be available to authorized CLINCHOICE personnel and personnel of its subsidiaries and to authorized parties working with or on behalf of CLINCHOICE to manage the enquiry.</p> <p>Please refer also to paragraph 4. Personnel authorized to process your data</p>

Location of the processing	Please refer to paragraph 5. Places where your data are processed, including cross-border transfer
Rights	<p>You have the right to:</p> <ul style="list-style-type: none"> - request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability. - withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. - submit a complaint to a supervisory authority. <p>Please refer also to paragraph 8. Your Rights</p>

6.3 Informative for the Data Processing via “Insights (“Access This Resource Now!” and “Get Blog and Resources from ClinChoice” forms)” webpage

Data Collected	CLINCHOICE collects, through this webpage, information that can identify you such as your name, surname, Company and contact details.
Data Collected – not mandatory	Not applicable
Type of Processing	CLINCHOICE will process these data electronically and in paper.
Purposes of the processing	<p>CLINCHOICE process this information:</p> <ul style="list-style-type: none"> • to understand your needs and provide you with required information, if any • to provide you with a better service as well as improving our products and services. <p>We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.</p> <p>From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, or mail. We may use the information to customize the website according to your interests.</p>

	Under these circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	Data will be retained for a period (10 years) allowing CLINCHOICE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CLINCHOICE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CLINCHOICE personnel and its subsidiaries and to authorized parties working with or on behalf of CLINCHOICE to manage the enquiry. Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including cross-border transfer
Rights	You have the right to: <ul style="list-style-type: none"> - request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability. - withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. - submit a complaint to a supervisory authority. Please refer also to paragraph 8. Your Rights

6.4 Informative for the Data Processing via “Careers” webpage

Data Collected	<p>CLINCHOICE collects, through the applicant tracking system (Greenhouse website), information that can identify you such as, but not limited to, your name, surname; contact information including email address; demographic information such as address, postcode, city, and country.</p> <p>We may collect also other information: when you upload your CV in the dedicated section, CLINCHOICE collects all the information reported in the CV: your education, past working experience but also pictures, hobbies, preferences and interests and any data belonging to particular category of data.</p>
Data Collected – not mandatory	<p>In the field marked as not mandatory, CLINCHOICE can collect also other information like phone number, but only if provided by you.</p> <p>You should know that CLINCHOICE will process all the information you will freely decide to write in the field marked as not mandatory (such as, but not limited to) preferences and interests.</p>
Type of Processing	<p>CLINCHOICE will process these data electronically and in paper as applicable.</p>
Purposes of the processing and applicable legal basis	<p>CLINCHOICE process this information:</p> <ul style="list-style-type: none"> - for the purposes of the recruitment based on your consent - to share your data with third parties, if needed, in relation to the recruitment process (e.g. recruitment agencies, background check agencies, clients); - for carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment as per applicable laws - to understand your needs and provide you required information, if any - to provide you with a better service, improving our products and services. <p>We may periodically send emails about new opportunities, company updates and newsletters or other information which we think you may find interesting using the email address which you have provided. From time to time, we may also use your information to contact you for market research purposes. We may contact you by email or phone. We may use the information to customize the website according to your interests. Under these circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above points.</p>

Automated decision-making, including profiling	Not subject to a decision based solely on automated processing.
Retention time	With your consent, data will be retained for a period (4 years) allowing CLINCHOICE to process your data for the purposes mentioned above and to present you with additional job opportunities if the possibility arises. This period is considered sufficient also for complying to any obligation to which CLINCHOICE is subject, including any establishment, exercise, or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CLINCHOICE personnel and to its subsidiaries and to authorized parties working with or on behalf of CLINCHOICE to manage resources data. Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including cross-border transfer
Rights	You have the right to: <ul style="list-style-type: none"> - request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability - withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal - lodge a complaint with a supervisory authority. Please refer also to paragraph 8. Your Rights

6.5 Informative for the Data Processing via “Investigators” webpage

Data Collected	CLINCHOICE collects, through this webpage, information that can identify you such as, but not limited to, your name, surname, contact information including Company, email address, demographic information such as postcode, city and country.
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Data Collected – not mandatory	<p>In the field marked as “not mandatory”, CLINCHOICE can collect also other information such as your experience, messages, notes, and comments, but only if provided by you.</p> <p>CLINCHOICE will process all the information you will freely decide to write in the field marked as “not mandatory” such as, but not limited to preferences and interests.</p>
Type of Processing	<p>CLINCHOICE will process these data electronically and in paper, as applicable.</p>
Purposes of the processing	<p>CLINCHOICE process this information:</p> <ul style="list-style-type: none"> - to understand your needs and provide you with required information, if any - to provide you with a better service as well as improving our products and services. <p>We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.</p> <p>From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, or mail. We may use the information to customize the website according to your interests.</p> <p>Under these circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.</p>
Automated decision-making, including profiling	<p>Not subject to a decision based solely on automated processing</p>
Retention time	<p>Data will be retained for a period (10 years) allowing CLINCHOICE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CLINCHOICE is subject, including any establishment, exercise or defense of legal claims.</p>
Authorized personnel	<p>The information you provide to us will be available to authorized CLINCHOICE personnel and its subsidiaries and to authorized parties working with or on behalf of CLINCHOICE to manage the enquiry.</p> <p>Please refer also to paragraph 4. Personnel authorized to process your data</p>

Location of the processing	Please refer to paragraph 5. Places where your data are processed, including cross-border transfer
Rights	<p>You have the right to:</p> <ul style="list-style-type: none"> - request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability - withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal - submit a complaint to a supervisory authority. <p>Please refer also to paragraph 8. Your Rights</p>

7. Involved tools, Security and Limitation Restriction

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

CLINCHOICE takes reasonable measures to maintain the confidentiality of your personal information regardless of the country where such information is stored or transferred to.

In compliance with Article 5.1.(c) of the GDPR, User access to personal data are set up according to the principle of least privileges.

Such data are processed only to the extent required to achieve the purposes indicated in this Policy and will be stored for as long as strictly necessary for achievement of the specific purposes pursued - in any event, the criterion used to determine the storage period is based on compliance with time limits permitted by law and the principles of data minimization, storage limitation or rational management of our records.

8. Your Rights

You, as user of our web site, have the right to:

- (a) request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- (b) the right to withdraw any consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- (c) the right to submit a complaint with a supervisory authority;
- (d) know and understand whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether if you are obligated to provide the personal data and of the possible consequences of failure to provide such data;
- (e) know and understand the existence or not of automated decision-making, including profiling

If CLINCHOICE intends to further process the personal data for a purpose other than that for which your personal data were collected, we will provide you, prior to that further processing, with relevant information for that other purpose.

We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting.

Exercise your rights

You may choose to restrict the collection or use of your personal information in the following ways: whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at data.protection@clinchoice.com.

About direct marketing purposes, you may change your mind at any time and let us know by contacting us as follows

- Replying to the e-mail asking for not to be contacted anymore for direct marketing
- Writing to us at: data.protection@clinchoice.com



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You may request details of personal information which we hold about you under GDPR and any applicable local Regulation. An administrative fee will be payable, in compliance with the law.

Please submit all requests to
data.protection@clinchoice.com

If you believe that any information, we are holding about you is incorrect or incomplete, please write to or email us as soon as possible, at the above email address. We will promptly correct any information found to be incorrect.