

# Privacy Policy

## About this policy

The goal of the CTC is to increase the level of Clinical Trial investments in Africa by increasing the visibility of African clinical trialists and research Platforms as well as making transparent and accessible individual country regulatory and ethics procedures to inform decision making.

The Clinical Trials Community provides a platform for constant engagement among key stakeholders to increase efficiency and promote steady collaborations.

nuvoteQ is currently the host for the Platform, and all its users have responsibility for the personal data they provide to the Platform.

This Policy (together with the [Terms & Conditions](#) and any other documents referred to in it) sets out the basis on which any personal data collected from you, or provided by you, will be processed by the Platform. Please read the following carefully to understand our practices regarding your personal data and how it will be treated. By continuing to use <https://www.ctc.africa> you are accepting and consenting to the practices described in this Policy.

## The Privacy policy

<https://www.ctc.africa> and any subdomains therein (“The Platform”) are operated by nuvoteQ. We are committed to protecting the privacy and security of your personal information (‘personal data’).

This policy (together with our Terms & Conditions, and any other documents referred to in it) describes how we collect and use your personal data during your use of our Platform, in accordance with the General Data Protection Regulation (GDPR) and associated data protection legislation.

## Who is using your personal data?

nuvoteQ is the “data controller” for the information that you provide to us when visiting this Platform. This means that we decide how to use it and are responsible for looking after it in accordance with the GDPR.

Access to your personal data within nuvoteQ will be provided to those staff who need to view it as part of their work in connection with the operation of this Platform. It will also be shared with the third parties described in Section 10 below.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## Updating of the policy

We reserve the right to update this policy at any time. Use of the Platform includes accessing, browsing, or registering to use the Platform.

## Glossary

Where we refer in this policy to your 'personal data', we mean any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure, or retention.

## Types of data we collect about you

We will collect, store, and use the following categories of data when you use our Platform:

Data you give us. You may give us data about you including:

- Your name
- Your email address
- Your organizational name
- Job title
- Telephone contact details

Data we collect about you unless you prevent or delete cookie/s. Refer to our Cookie Statement.

- If you visit our Platform, we will automatically collect certain technical information, for example, the type of device (and its unique device identifier) you use to access our Platform, the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform.
- We will automatically collect information about your visit to our Platform including the full Uniform Resource Locators (URL), clickstream to, through and from the Platform (including date and time), pages you viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

## When we collect your data

We will collect the vast majority of data about you when you register to use our Platform, e-mail or otherwise, subscribe to our service, participate in discussion boards or other social media functions on our Platform, enter a survey, or when you report a problem with our Platform.

When you visit our Platform, we may also automatically collect technical information about your visit from your computer.

## How we use your data

We process your data for one or more of the following reasons:

- To provide you with the services, products and/or information you have requested e.g., issues with registration, logins, activities on the Platform and queries on discussion forums.
- This processing is necessary to meet our contractual obligations to you or to take steps requested by you prior to entering a contract. Information processed for this purpose includes, but is not limited to email address, name, location, job role, telephone number.
- To send you Platform update notifications by email e.g., further changes to our terms and conditions, service disruption or Platform maintenance and new content, member Platforms and Platform functionality. We do this only where you have specifically indicated that you consent to receive such communications, for example, when you register to the Platform e.g., by ticking the consent box. You can withdraw your consent at any time by contacting us at [support@ctc.africa](mailto:support@ctc.africa). In this event, we will stop any processing as soon as we can. However, this will not affect the lawfulness of any processing carried out before your withdrawal of consent and you may no longer be able to use the Platform in the same way you did before.
- For purposes arising from your use of this Platform, for example, to ensure that we understand who uses our Platform and how our Platform is used and to improve our Platform and ensure it is secure. This processing occurs because it is necessary to meet our legitimate interests in operating this Platform. Information processed for this purpose includes but is not limited to contact details and Platform/newsletter use.
- We will only use your data for the purposes for which we collected it unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.
- Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Contacting you**

We would like to send you information by email, and phone calls about Platform updates, events, services, and opportunities which may be of interest to you.

We will not provide your data to other businesses so they can use it for marketing purposes.

You can unsubscribe from Platform update notifications via the unsubscribe link on our correspondence. We are developing further functionality in the future which will give you the opportunity to clearly set out what messages you wish to receive by ticking these boxes – we will look to develop this soon so please check back here regularly for updates.

## **Sharing your data with third parties**

We may share your data with third parties who are stakeholders in the Clinical Trials community.

All our third-party service providers are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes.

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our Platform terms of use or to protect the rights, property or safety of our Platform, our users, and others.

Where your data is shared with third parties, we will seek to share the minimum amount necessary.

Any data from the processing of compliance assessments which is shared with a third party will be at a high level and anonymized.

## **Where we store or use your data**

We may store data collected by the Platform manually or electronically. The data are stored on Amazon Web Services servers on their premises within Ireland.

There may be occasions when we transfer your data outside the European Economic Area (EEA), for example, when we communicate with you using a cloud-based service provider that operates outside the EEA such as Survey Monkey/MailChimp/Eventbrite/Wuhoo/etc. Such transfers will only take place if one of the following applies:

- the country receiving the data is considered by the EU to provide an adequate level of data protection;

- the organisation receiving the data is covered by an arrangement recognised by the EU as providing an adequate standard of data protection e.g. transfers to companies that are certified under the EU US Privacy Shield;
- the transfer is governed by approved contractual clauses;
- the transfer has your consent;
- the transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract; or
- the transfer is necessary for the performance of a contract with another person, which is in your interests.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data transmitted to the Platform and any transmission is at your own risk.

### **Third party Platforms**

In the future it is likely our Platform will contain links to and from various third-party Platforms. If you follow a link to any of these Platforms, please note that these Platforms have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these Platforms.

### **Retaining your data**

We will only retain your data for as long as we need it to fulfil our purposes.

### **Your rights**

Under certain circumstances, by law you have the right to:

- Request access to your data (commonly known as a "subject access request"). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- Request correction of your data. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- Request erasure of your data. This enables you to ask us to delete or remove your data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- Object to processing of your data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

- Request the restriction of processing of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your data to another party.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. However, where you have consented to the processing you can withdraw your consent at any time by emailing us at: [support@ctc.africa](mailto:support@ctc.africa) . In this event, we will stop the processing as soon as we can. However, this will not affect the lawfulness of any processing carried out before your withdrawal of consent and you may no longer be able to use the Platform in the same way as you did before.

## **Cookies**

Our Platform uses cookies to distinguish you from other users of our Platform. This helps us to provide you with a good experience when you browse our Platform and allows us to improve our Platform. For detailed information on the cookies, we use and the purposes for which we use them see our Cookie Statement [www.ctc.africa/cookie-statement/](http://www.ctc.africa/cookie-statement/).

## **Changes to this policy**

We reserve the right to make changes to this Privacy policy. Any changes we may make in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## **Contact Us**

If you wish to raise any queries or concerns about this privacy policy, please contact us at [support@ctc.africa](mailto:support@ctc.africa)