

ASSURED CLINICAL RESEARCH

Privacy Policy

Effective Date: January 1, 2026 | **Last Updated:** April 1, 2026

Assured Clinical Research Limited (“ACR,” “we,” “us,” or “our”) is committed to protecting your privacy and handling your personal information responsibly. This Privacy Policy explains how we collect, use, disclose, and protect information when you visit our website at

<https://assuredclinical.com/> (the “Site”), and describes your rights regarding that information.

ACR operates clinical research sites in the United Kingdom and maintains business operations in the United States. This policy is designed to comply with applicable data protection laws in both jurisdictions, including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, the EU General Data Protection Regulation (EU GDPR) where applicable, and relevant US privacy laws including the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA).

By using the Site, you acknowledge that you have read and understood this Privacy Policy.

1. Who We Are (Data Controller Information)

For the purposes of UK GDPR and EU GDPR, Assured Clinical Research Limited is the Data Controller responsible for your personal data collected through this Site.

Organisation: Assured Clinical Research Limited

UK Address: Campingland Surgery, Campingland, Swaffham, Norfolk, PE37 7RD, United Kingdom

Email: hello@assuredclinical.com

Privacy enquiries: privacy@assuredclinical.com

ICO Registration Number: ZC068422

Registration expires: 17 December 2026 (renewable annually)

2. Information We Collect

We collect the following categories of personal information:

2.1 Contact and Identity Information

When you submit an enquiry, register interest in a clinical trial, or contact us through the Site, we may collect your name, email address, phone number, and any other information you choose to provide.

2.2 Health and Sensitive Information

If you are a potential study participant, you may choose to provide information about your health, medical history, or demographic characteristics to help us assess your eligibility for clinical trials. This constitutes special category data under UK/EU GDPR and is handled with heightened protections as described in Section 5 below.

2.3 Professional Information

If you are an investigator, research professional, or healthcare provider, we may collect your curriculum vitae, professional qualifications, licensure details, and professional contact information.

2.4 Automatically Collected Information

When you visit the Site, we automatically collect certain technical information, including:

- IP address and approximate geographic location
- Browser type, version, and operating system
- Pages visited, time spent on the Site, and referring URLs
- Device identifiers and cookie data

This information is collected using cookies and similar tracking technologies, as described in Section 7.

3. Lawful Basis for Processing (UK/EU GDPR)

Under UK GDPR and EU GDPR, we are required to identify a lawful basis for processing your personal data. We rely on the following bases:

- **Consent (Article 6(1)(a) and Article 9(2)(a)):** Where you have given clear consent for us to process your personal data for a specific purpose, including the collection of health information for clinical trial eligibility assessment, and for receipt of SMS communications.
- **Legitimate Interests (Article 6(1)(f)):** For processing necessary for our legitimate interests in operating and improving the Site, responding to enquiries, and maintaining the security of our systems, where your interests and fundamental rights do not override those interests.
- **Legal Obligation (Article 6(1)(c)):** Where processing is necessary for compliance with our legal obligations, including those arising under clinical research regulations (ICH GCP, MHRA requirements, and applicable UK law).
- **Scientific Research (Article 9(2)(j) and Schedule 1, DPA 2018):** Where health data is processed for the purposes of clinical research, subject to appropriate safeguards and in accordance with applicable research governance frameworks.

4. How We Use Your Information

We use the information we collect for the following purposes:

- To assess your eligibility for current or upcoming clinical trials and research studies.
- To communicate with you regarding research opportunities, study enquiries, or your submitted requests.
- To maintain and improve the Site's functionality and user experience.
- To comply with our legal, regulatory, and ethical obligations related to clinical research, including those imposed by the MHRA, HRA, ICH GCP, and applicable sponsor requirements.
- To send you SMS or text message communications where you have explicitly opted in to receive them.
- To analyse how the Site is used and to maintain its security.
- To respond to legal requests and prevent harm.

5. Health and Special Category Data

Health information is "special category" data under UK/EU GDPR and is afforded additional legal protections. Where you voluntarily provide health information through the Site:

- We process it only on the basis of your explicit consent and/or for the purposes of scientific research under Article 9(2)(j) UK GDPR and Schedule 1 of the Data Protection Act 2018.
- Access is restricted to authorised ACR personnel and, where applicable, appropriately authorised sponsor representatives.
- It is subject to the same security standards applied to our clinical research records.
- Submission of health information through the Site does not constitute enrolment in a clinical trial. Formal enrolment requires a separate informed consent process conducted in person with a qualified investigator.

6. Disclosure of Your Information

We do not sell your personal information. We may share your information in the following circumstances:

6.1 Clinical Trial Sponsors and Partners

Where you have expressed interest in a specific study, we may share your information with the relevant clinical trial sponsor or contract research organisation (CRO) to facilitate your potential participation. Such

sharing is governed by appropriate data sharing agreements and is limited to what is necessary for the research purpose.

6.2 Service Providers

We engage third-party service providers to support the operation of the Site, including website hosting, analytics (e.g., Google Analytics), and security services (e.g., Google reCAPTCHA). These providers act as data processors on our behalf and are contractually bound to process your data only on our instructions and to maintain appropriate security measures.

6.3 Legal and Regulatory Requirements

We may disclose your information where required by applicable law or in response to valid requests from public authorities, including regulatory bodies such as the MHRA (UK), FDA (US), or law enforcement agencies. We may also disclose information to protect the rights, property, or safety of ACR, our participants, or others.

6.4 Business Transfers

In the event of a merger, acquisition, reorganisation, or sale of all or part of our business, your information may be transferred to the successor entity, subject to the same privacy protections described in this policy.

7. Cookies and Tracking Technologies

7.1 What We Use

Our Site uses cookies and similar technologies. These fall into the following categories:

- **Strictly Necessary Cookies:** Essential for the Site to function. These cannot be disabled.
- **Analytics Cookies:** We use Google Analytics to understand how visitors use the Site. These cookies collect information in aggregate and anonymised form.
- **Security Cookies:** We use Google reCAPTCHA to protect forms against automated abuse.

7.2 Your Cookie Choices

Under UK PECR (Privacy and Electronic Communications Regulations) and UK GDPR, we are required to obtain your consent before placing non-essential cookies on your device. When you first visit the Site, you will be presented with a cookie consent notice that allows you to accept or decline non-essential cookies.

You may also manage cookies at any time through your browser settings. Note that disabling certain cookies may affect the functionality of parts of the Site.

8. SMS and Text Messaging

By providing your phone number and checking the consent box on our forms, you consent to receive customer care-related text messages from Assured Clinical Research.

- **Opt-Out:** Reply STOP to any message to unsubscribe at any time.
- **Help:** Reply HELP for assistance.
- **Frequency:** Message frequency varies per user.
- **Charges:** Message and data rates may apply. Carriers are not liable for delayed or undelivered messages.
- **Withdrawal:** Withdrawal of consent for SMS does not affect the lawfulness of any messages sent prior to withdrawal.

9. Data Retention

We retain your personal information only for as long as is necessary for the purposes set out in this policy, or as required by applicable law. Our general retention approach is:

- Website enquiry and contact data: retained for up to 2 years from your last interaction with us, or until you request deletion.
- Clinical trial eligibility and health information submitted through the Site: retained for up to 3 years, or longer if required by the applicable study protocol, sponsor requirements, or regulatory obligations.
- Professional information submitted by investigators or research professionals: retained for up to 5 years from submission.
- Technical and analytics data: retained in anonymised or aggregated form for up to 26 months (Google Analytics default).

Data relating to formally enrolled clinical trial participants is subject to separate retention schedules governed by ICH GCP requirements and applicable sponsor agreements, which typically require retention for a minimum of 15 to 25 years.

10. International Data Transfers

ACR operates in both the United Kingdom and the United States. Your personal data may be transferred to, stored in, or processed in the United States or other countries that may have different data protection standards to those in your home jurisdiction.

Where we transfer personal data from the UK or EU to countries not recognised as providing an adequate level of data protection (including the United States in certain contexts), we ensure appropriate safeguards are in place, which may include:

- UK International Data Transfer Agreements (IDTAs) or EU Standard Contractual Clauses (SCCs) with our service providers and partners.
- Binding corporate rules or other legally recognised transfer mechanisms.

For more information about the safeguards in place for international transfers, please contact us at privacy@assuredclinical.com.

11. Your Rights

11.1 Rights Under UK GDPR / EU GDPR

If you are located in the UK or EU, you have the following rights regarding your personal data:

- **Right of Access:** To request a copy of the personal data we hold about you.
- **Right to Rectification:** To request correction of inaccurate or incomplete personal data.
- **Right to Erasure ('Right to be Forgotten')**: To request deletion of your personal data where there is no compelling reason for its continued processing. Note that this right may be limited where retention is required by law or for legitimate research purposes.
- **Right to Restrict Processing:** To request that we limit how we use your data in certain circumstances.
- **Right to Data Portability:** To receive your personal data in a structured, commonly used, machine-readable format.
- **Right to Object:** To object to processing based on legitimate interests or for direct marketing purposes.
- **Right to Withdraw Consent:** To withdraw consent at any time where processing is based on consent. Withdrawal does not affect the lawfulness of processing prior to withdrawal.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) at www.ico.org.uk or by calling 0303 123 1113. If you are in the EU, you may contact your local supervisory authority.

11.2 Rights Under CCPA/CPRA (California Residents)

If you are a California resident, you have the following rights under the CCPA as amended by the CPRA:

- **Right to Know:** To request disclosure of the categories and specific pieces of personal information we have collected about you, the sources, the business purposes, and the categories of third parties with whom we share it.
- **Right to Delete:** To request deletion of your personal information, subject to certain exceptions.
- **Right to Correct:** To request correction of inaccurate personal information.
- **Right to Opt-Out of Sale or Sharing:** We do not sell or share your personal information for cross-context behavioural advertising.
- **Right to Limit Use of Sensitive Personal Information:** To limit our use of sensitive personal information to purposes permitted by the CPRA.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your CCPA/CPRA rights.

To exercise your California rights, please submit a verifiable consumer request to privacy@assuredclinical.com. We will respond within 45 days of receipt.

12. How to Exercise Your Rights

To exercise any of the rights described in Section 11, or to ask questions about how we handle your personal data, please contact us at:

Email: privacy@assuredclinical.com

Post: Data Privacy, Assured Clinical Research Limited, Campingland Surgery, Campingland, Swaffham, Norfolk, PE37 7RD, United Kingdom

We will respond to all requests within one month (UK/EU GDPR) or 45 days (CCPA/CPRA) of receipt. In complex cases we may extend this period, in which case we will notify you.

We may need to verify your identity before processing your request. We will not charge a fee for reasonable requests but reserve the right to charge a reasonable fee for manifestly unfounded or excessive requests.

13. Data Security

We implement appropriate technical and organisational measures to protect your personal information against unauthorised access, accidental loss, alteration, or disclosure. These measures include encryption of data in transit (TLS/SSL), access controls, and regular security reviews.

No method of transmission over the internet or method of electronic storage is completely secure. While we strive to protect your personal data, we cannot guarantee absolute security. In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours and will notify affected individuals without undue delay where required to do so.

14. Children's Privacy

Our Site is not directed to children. We do not knowingly collect personal information from children under 13 years of age (or under 16 in the UK and EU) without verifiable parental or guardian consent. If you believe we have inadvertently collected information from a child, please contact us immediately at privacy@assuredclinical.com and we will take prompt steps to delete it.

15. Third-Party Links

Our Site may contain links to third-party websites. This Privacy Policy applies only to information collected through our Site. We are not responsible for the privacy practices of third-party sites and encourage you to review their privacy policies before providing any personal information.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make material changes, we will update the “Last Updated” date at the top of this policy and, where appropriate, provide more prominent notice.

We encourage you to review this policy periodically to stay informed about how we protect your information. Your continued use of the Site after any changes constitutes your acceptance of the updated policy.

17. Contact Us

If you have any questions, concerns, or complaints about this Privacy Policy or our data handling practices, please contact us:

Assured Clinical Research Limited

Campingland Surgery, Campingland, Swaffham, Norfolk, PE37 7RD, United Kingdom

General enquiries: hello@assuredclinical.com

Privacy & data protection: privacy@assuredclinical.com

For UK/EU data protection complaints, you may also contact the Information Commissioner’s Office (ICO):

ICO website: www.ico.org.uk

ICO helpline: 0303 123 1113

Schedule A – California Privacy Disclosures (CCPA/CPRA)

In the preceding 12 months, ACR has collected the following categories of personal information from California consumers:

- Identifiers (e.g., name, email address, IP address)
- Personal information as defined in California Customer Records Law (e.g., name, contact information)
- Sensitive personal information (e.g., health and medical information, where voluntarily provided)
- Internet or electronic network activity information (e.g., browsing history on the Site)

We collect this information for the business purposes described in Section 4 of this policy. We do not sell California consumers’ personal information, nor do we share it for cross-context behavioural advertising.

To submit a verifiable consumer request under the CCPA/CPRA, contact us at privacy@assuredclinical.com.

This Privacy Policy was prepared for Assured Clinical Research Limited. It does not constitute legal advice. ACR recommends periodic review by a qualified data protection or privacy solicitor, particularly as regulatory requirements evolve.