

PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your Personal Information. It also explains your rights in relation to your Personal Information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain Personal Information about you. When we do so we are subject to data protection laws applicable in the United Kingdom and we are responsible as ‘controller’ of that Personal Information for the purposes of those laws.

1. KEY TERMS

Key terms used in this policy:

We, us, our	Solid Form Solutions Limited, a company registered in Scotland with registered address C/O CMS Cameron Mckenna Nabarro Olswang LLP, 1, West Regent Street, Glasgow, United Kingdom, G2 1AP (registered company number SC340320), being a wholly owned subsidiary of Avista Pharma Solutions, Inc.
Personal Information	Any information relating to an identified or identifiable individual

2. PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect and use the following Personal Information about you:

- your name and contact information, including email address and telephone number; and
- information about how you use our website.
- financial details e.g. bank account details

This Personal Information is required to inform you about the contract research services we can or currently provide to you. Where you fail to provide that Personal Information when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a contract research service you have with the Company, but we will notify you if this is the case at the time.

3. HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect most of this Personal Information directly from you, by telephone, text or email and/or via our website and Salesforce app. However, we may also collect information:

- from publicly accessible sources, eg Companies House or social media websites;
- directly from a third party, e.g.:
 - sanctions screening providers;

- credit reference agencies;
- customer due diligence providers;
- Collection of information that is automatically generated when you visit the websites and your computer's internet protocol address, browser type, browser version, the pages of our websites that you visit, the time and date of your visit, the time spent on those pages, your general location, such as your city, state or country ("Location Data") and other devices and diagnostic data used to enhance our website and services.
- via our IT systems that are automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems.

4. HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so. In order to use your personal information, we rely on the following legal bases:

- (i) processing is necessary for the performance of the services we provide to you;
- (ii) processing is necessary for the purposes of the legitimate business interests pursued by us; and
- (iii) processing is necessary for compliance with a legal obligation to which we are subject (including undertaking screening for financial and other sanctions and conduct checks to identify you and verify your identity).

Generally, we do not rely on consent as a legal basis for processing your Personal Information other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us (see '**How to contact us**' below).

We collect and process your personal information in order to:

- provide contract research services to you;
- inform you of contract research services that may be of interest;
- update customer records;
- prevent unauthorised access and modification to our systems; and
- undertake statistical analysis to help us manage our business e.g. in relation to financial performance, client base and work type.

5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share Personal Information with:

- companies within the Avista Pharma Solutions, Inc. group;

- third parties we use to help deliver our contract research services to you;
- third parties approved by you;
- credit reference agencies; and
- our insurers and brokers.

We only allow our service providers to handle your Personal Information if we are satisfied they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers relating to ensure they can only use your Personal Information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your Personal Information with any other third party.

6. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for your Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

When it is no longer necessary to retain your Personal Information, we will delete it.

7. TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE EEA

We may transfer Personal Information that we collect from you to third party data processors, vendors or hosting partners acting on our behalf located in countries outside of the European Economic Area ("**EEA**") or to other entities in our group of companies in connection with the purposes set out above. We will only transfer your personal information outside the EEA where either the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or we have put in place adequate safeguards as required by applicable data protection law.

If you would like further information, please contact (see '**How to contact us**' below).

8. YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your Personal Information (the right of access).
Rectification	The right to require us to correct any mistakes in your Personal Information.
Erasure	The right to require us to delete your Personal Information—in certain situations.
Restriction of processing	The right to require us to restrict processing of your Personal Information—in certain circumstances, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the Personal Information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
To object	The right to object: —at any time to your Personal Information being processed for direct marketing (including profiling); or —in certain other situations to our continued processing of your Personal Information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
Withdraw consent	The right to withdraw your consent to us processing your Personal Information at any time if our processing is based on your consent.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to—see below: '**How to contact us**'; and

- let us have enough information to identify you (*eg your full name, address and customer or matter reference number*);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

9. **KEEPING YOUR PERSONAL INFORMATION SECURE**

The security of your personal data is important to us. We maintain reasonable safeguards designed to protect against loss, misuse, and unauthorised access, disclosure, alteration, and destruction of the information we receive. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

10. **HOW TO COMPLAIN**

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

11. **CHANGES TO THIS PRIVACY POLICY**

This privacy notice was published on November 15, 2018, and replaces an earlier privacy notice posted on the Company's web site earlier this year.

We may change this privacy notice from time to time, when we do we will inform you via either email or our website.

12. **HOW TO CONTACT US**

Please contact us by our website, post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details
Solid Form Solutions Limited 1 The Fleming Building Edinburgh Technopole



Our contact details

Milton Bridge

Nr. Penicuik

EH26 0BE

Scotland

Tel: +44 (0)131 440 8000