

## Privacy Policy

Cytel is committed to protecting your privacy. Cytel has put in place procedures to ensure that your personal information is processed responsibly and in accordance with applicable data protection / privacy laws. This privacy policy outlines the principles Cytel follows with respect to the transfer of personal data from the European Economic Area (EEA) and Switzerland to the United States.

### Scope

This policy applies to all personal information, either electronic or paper format, received by Cytel in the United States from the EEA and Switzerland.

Personal information means information that reveals race, ethnic origin, political opinions, or information that concerns health or sex life. In addition, Cytel will treat as sensitive, any information received from a third party where the third party treats and identifies the information as sensitive.

### U.S.-EU and U.S.-Swiss Safe Harbor Certification

Cytel Inc. (Cytel) complies with the U.S.-EU and U.S.-Swiss. Safe Harbor Frameworks in connection with the collection, use, and retention of personal information from European Union member countries and Switzerland to its affiliates in the United States. Cytel has certified that it adheres to the Safe Harbor Privacy Principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access, and Enforcement, for personal data pertaining to clinical research participants, patients, human resources, customers and suppliers, in any format. You can learn more about the Safe Harbor principles and Cytel's additional obligations under the Safe Harbor Certification Program by going to the U.S. Department of Commerce's Safe Harbor website at: [www.export.gov/safeharbor/](http://www.export.gov/safeharbor/). You can also view Cytel's Safe Harbor certification information through that site. If you have questions about Cytel's Safe Harbor practices under the U.S.-E.U. or U.S.-Swiss frameworks, or believe that your information has been mismanaged, you can contact Cytel's U.S. Privacy Officer by writing to us at: Cytel, Inc. 675 Massachusetts Ave, Cambridge, MA 02139.

### Relevance

We'll collect only as much personal information as we need for specific, identified purposes, and we won't use it for other purposes without obtaining your consent.

### Retention

We'll keep your personal information only as long as we need it for the purposes for which we collected it, or as permitted by law.

## Accuracy

We'll take appropriate steps to make sure the personal information in our records is accurate.

## Sharing

Except as described in this policy, we won't share your personal information with third parties without your consent.

## International Transfer

If we transfer your personal information to another country, we'll take appropriate measures to protect your privacy and the personal information we transfer.

## Enforcement

We'll regularly review how we're meeting these privacy promises, we we'll provide an independent way to resolve complaints about our privacy practices.

## Information Security

Cytel maintains a reasonable level of physical, electronic and managerial procedures in order to protect the information that it collects. This includes maintaining computer equipment, networks, programs and documentation to a common standard and restricting access to equipment and information to appropriate staff.

## Inquiries, Complaints and Information Corrections

To make a complaint or submit an inquiry, please write to Cytel at the following address:

Cytel, Inc.  
Att: Privacy Officer  
675 Massachusetts Avenue  
Cambridge, MA 02139