

# Collaborative Clinical Consulting Online Services Privacy Policy

## PRIVACY NOTICE

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### Introduction

This privacy notice for Collaborative Clinical Consulting, LLC (doing business as CCollaborative) ("**Company**," "**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your information when you use our online services ONLY ("**Services**"), such as when you:

Visit our website at <https://ccollaborative.com/>, our LinkedIn page at <https://www.linkedin.com/company/ccollaborative/> or any website of ours that links to this privacy notice.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com).

### Summary Of Key Points

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Collaborative Clinical Consulting and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we receive any information from third parties? We may receive information from public databases, marketing partners, social media platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. We will never sell your personal information.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties.

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do I exercise my rights? The easiest way to exercise your rights is to email us at [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com). We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what Collaborative Clinical Consulting does with any information we collect? Review the notice in full below.

## Table of Contents

Collaborative Clinical Consulting Online Services Privacy Policy.....	1
PRIVACY NOTICE.....	1
Introduction .....	1
Summary Of Key Points .....	1
1. What Information Do We Collect?.....	2
2. How Do We Process Your Information?.....	3
3. What Legal Bases Do We Rely on To Process Your Information? .....	4
4. When and with Whom Do We Share Your Personal Information?.....	4
5. What Is Our Stance on Third-Party Websites?.....	4
6. Do We Use Cookies and Other Tracking Technologies?.....	5
7. Is Your Information Transferred Internationally?.....	5
8. How Long Do We Keep Your Information? .....	5
9. How Do We Keep Your Information Safe?.....	5
10. Do We Collect Information from Minors?.....	5
11. What Are Your Privacy Rights?.....	5
12. Controls for Do-Not-Track Features .....	6
13. Do California Residents Have Specific Privacy Rights? .....	6
14. Do We Make Updates to This Notice? .....	9
15. How Can You Contact Us About This Notice? .....	10
16. How Can You Review, Update, Or Delete The Data We Collect From You? .....	10

## 1. What Information Do We Collect?

### Personal information you disclose to us.

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you interact with us online. For example, if you complete our 'Contact Us' form, interact with our LinkedIn page, or email us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

First and Last Names

Email Address

Phone Number

Job Role

Institution

Sensitive Information. We do not process sensitive information.

Payment Data. We do not accept online payments at this time.

**Information automatically collected.**

In Short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – may be automatically collected when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include usage information, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

On our website we do not utilize cookies, or any third party services that utilize cookies.

**Information collected from other sources.**

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g., LinkedIn), we receive personal information about you such as your name, email address, and gender. Any personal information that we collect from your social media account depends on your social media account's privacy settings.

## 2. How Do We Process Your Information?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.

To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.

To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.

To fulfill and manage your orders. We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.

To request feedback. We may process your information when necessary to request feedback and to contact you about your use of our Services.

To send you marketing and promotional communications. We may process the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see "WHAT ARE YOUR PRIVACY RIGHTS?" below).

To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them.

To determine the effectiveness of our marketing and promotional campaigns. We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

### 3. What Legal Bases Do We Rely on To Process Your Information?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, i.e., with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

### 4. When and with Whom Do We Share Your Personal Information?

In Short: We may share information in specific situations described in this section and/or with the following categories of third parties.

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents (“**third parties**”) who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

We also may need to share your personal information in the following situations:

**Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

**Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

**Other Users.** When you share personal information (for example, when interacting with Collaborative Clinical Consulting online by posting comments, contributions, or other content to the Services) or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside the Services in perpetuity. If you interact with other users of our Services and register for our Services through a social network (such as LinkedIn), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.

### 5. What Is Our Stance on Third-Party Websites?

In Short: We are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Services, but are not affiliated with, our Services.

The Services, may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

## 6. Do We Use Cookies and Other Tracking Technologies?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We do not use cookies within our website. You are responsible for reviewing the Cookie notice of any third-party service you use to interact with Collaborative Clinical Consulting (e.g., LinkedIn).

## 7. Is Your Information Transferred Internationally?

In Short: We may transfer, store, and process your information in countries other than your own.

Our data is secured and hosted within the United States (US). If you are accessing our Services from outside the US, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in the US, and other countries.

## 8. How Long Do We Keep Your Information?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 9. How Do We Keep Your Information Safe?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 10. Do We Collect Information from Minors?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com).

## 11. What Are Your Privacy Rights?

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send, or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. You will then be removed from the marketing lists – however, we may still communicate with you, for example to send you service-related messages that are necessary for the administration and use of your account.

If you have questions or comments about your privacy rights, you may email us at [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com).

## 12. Controls for Do-Not-Track Features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 13. Do California Residents Have Specific Privacy Rights?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

### CCPA Privacy Notice

The California Code of Regulations defines a "**resident**" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "**non-residents.**"

If this definition of "**resident**" applies to you, we must adhere to certain rights and obligations regarding your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
<b>A. Identifiers</b>	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal	YES

	identifier, online identifier, Internet Protocol address, email address, and account name	
<b>B. Personal information categories listed in the California Customer Records statute</b>	Name, contact information, education, employment, employment history, and financial information	YES
<b>C. Protected classification characteristics under California or federal law</b>	Gender and date of birth	NO
<b>D. Commercial information</b>	Transaction information, purchase history, financial details, and payment information	NO
<b>E. Biometric information</b>	Fingerprints and voiceprints	NO
<b>F. Internet or other similar network activity</b>	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	YES
<b>G. Geolocation data</b>	Device location	NO
<b>H. Audio, electronic, visual, thermal, olfactory, or similar information</b>	Images and audio, video or call recordings created in connection with our business activities	YES
<b>I. Professional or employment-related information</b>	Business contact details in order to provide you our services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES
<b>J. Education Information</b>	Student records and directory information	NO
<b>K. Inferences drawn from other personal information</b>	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

We may also collect other personal information outside of these categories instances where you interact with us in person, online, or by phone or mail in the context of:

Receiving help through our customer support channels,

Participation in customer surveys, and

Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

Collaborative Clinical Consulting collects and shares your personal information through:

Social media plugins: LinkedIn Plugins. We use social media features, such as a "Like" button, and widgets, such as a "Share" button in our Services. Such features may process your Internet Protocol (IP) address and track which page you are visiting on our website. We may place a cookie to enable the feature to work correctly. If you are logged in on a certain social media platform and you interact with a widget or button belonging to that social media platform, this information may be recorded to your profile of such social media platform. To avoid this, you should log out from that social media platform before accessing or using the Services. Social media features and widgets may be hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy notices of the companies that provide them. By clicking on one of these buttons, you agree to the use of this plugin and consequently the transfer of personal information to the corresponding

social media service. We have no control over the essence and extent of these transmitted data or their additional processing.

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com).

If you are using an authorized agent to exercise your right to opt out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be “selling” of your personal information.

CCollaborative Collaborative Clinical Consulting has disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

Category A. Identifiers, such as contact details like your real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name.

Category B. Personal information, as defined in the California Customer Records law, such as your name, contact information, education, employment, employment history, and financial information.

Category H. Audio, electronic, visual, and similar information, such as images and audio, video, or call recordings created in connection with our business activities.

Category I. Professional or employment-related information, such as business contact details in order to provide you our services at a business level or job title, work history, and professional qualifications if you apply for a job with us.

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under “WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?”.

Collaborative Clinical Consulting has never sold any personal information to third parties for business or commercial purpose.

Your rights with respect to your personal data

Right to request deletion of the data – Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed – Request to know

Depending on the circumstances, you have a right to know:

whether we collect and use your personal information,

the categories of personal information that we collect,

the purposes for which the collected personal information is used,

the categories of personal information that we disclosed for a business purpose,



the categories of third parties to whom the personal information was disclosed for a business purpose, and

the business or commercial purpose for collecting personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

#### Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

#### Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

#### Other privacy rights

You may object to the processing of your personal information.

You may request correction of your personal data if it is incorrect or no longer relevant or ask to restrict the processing of the information.

You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

#### Financial Incentives

**"Financial incentive"** means a program, benefit, or other offering, including payments to consumers as compensation, for the disclosure, deletion, or sale of personal information. We will not be offering financial incentive programs and will never sell personal information.

#### Metrics

Our metrics for all CCPA requests received for the previous calendar year can be requested by emailing [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com).

## 14. Do We Make Updates to This Notice?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 15. How Can You Contact Us About This Notice?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Carolyn Clancy, by email at [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com).

## 16. How Can You Review, Update, Or Delete the Data We Collect from You?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please email [letstalk@ccollaborative.com](mailto:letstalk@ccollaborative.com).