

Data Privacy at HRA

Introduction

Health Research Associates, Inc. (hereinafter referred to as “HRA,” “we,” “us” or “our”) is a leading health outcomes research consultancy that offers a wide range of services to public and private sector clients throughout the world. Protecting the privacy of our clients, collaborators, and research participants is of utmost importance to us.

HRA has established a comprehensive privacy program designed to help us respect and protect the privacy of personal data we receive from employees, consumers, healthcare professionals, medical research subjects and investigators, customers, and government officials. As a key component of our commitment to data privacy, HRA complies with the European Union-United States Privacy Shield Framework as set forth by the United States Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. HRA has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

This privacy policy outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This privacy policy applies to all personal information received by HRA whether in electronic, paper or verbal format.

In compliance with the Privacy Shield Principles, HRA commits to resolve complaints about our collection or use of your personal information. European Union individuals with inquiries or complaints regarding our Privacy Shield policy should first contact HRA Mona Martin at: martin@hrainc.net.

HRA has further committed to refer unresolved Privacy Shield complaints to JAMS Privacy Shield Program, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit <https://www.jamsadr.com/> for more information or to file a complaint. The services of JAMS Privacy Shield Program are provided at no cost to you.

Definitions

“Personal Information” or “Information” means information that (1) is transferred from the European Union to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

“Sensitive Personal Information” means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual’s health.

Principles

Notice

HRA shall inform an individual of the purpose for which it collects and uses the Personal Information and the types of non-agent third parties to which the HRA discloses or may disclose that Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to HRA, or as soon as practicable thereafter, and in any event before HRA uses or discloses the Information for a purpose other than for which it was originally collected.

Choice

HRA will offer individuals the opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. For Sensitive Personal Information, HRA will give individuals the opportunity to affirmatively or explicitly (opt out) consent to the disclosure of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. HRA shall treat Sensitive Personal Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information.

Onward Transfers

Prior to disclosing Personal Information to a third party (such as a governmental regulatory agency or ethics review board who may review study data to ensure appropriate conduct of research activities), HRA shall notify the individual of such disclosure and allow the individual the choice (opt out) of such disclosure. In the case of research subjects, HRA will provide the specific identity of any third parties receiving personal information and the purpose for the transfer in written informed consent documents completed by each individual subject prior to collection of his or her personal information. HRA shall ensure that any third party for which Personal Information may be disclosed subscribes to the Principles or are subject to law providing the same level of privacy protection as is required by the Principles and agree in writing to provide an adequate level of privacy protection. HRA is potentially liable for onward transfers to third parties of personal data of EU individuals received pursuant to Privacy Shield.

Data Security

HRA shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. HRA has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. HRA cannot guarantee the security of Information on or transmitted via the Internet.

Data Integrity

HRA shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, HRA shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

Access

HRA shall allow an individual access to their Personal Information and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

Enforcement

HRA uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. HRA is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). We encourage interested persons to raise any concerns using the contact information provided and we

will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles. It is possible, under certain conditions, for the individual to invoke binding arbitration. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using JAMS Privacy Shield Framework as a third-party dispute resolution provider.

Amendments

This privacy policy may be amended from time to time consistent with the requirements of the European Union-United States Department of Commerce Privacy Shield Framework. We will post any revised policy on this website.

Information Subject to Other Policies

HRA is committed to following the Principles for all Personal Information. However, certain information is subject to policies of HRA that may differ in some respects from the general policies set forth in this privacy policy. HRA is required to disclose personal information in response to lawful requests by public authorities, including those to meet national security or law enforcement requirements.

Contact Information

Questions, comments or complaints regarding HRA's Privacy Policy or data collection and processing practices can be mailed to:

Health Research Associates, Inc.
Attn: Privacy Officer
6505 216th Street SW
Suite 105
Mountlake Terrace, WA 98043

Effective date: August 20, 2015

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