

Privacy Policy for Cambridge Cognition’s Web-Based Cognitive Testing Application (“the Application”)

This privacy policy explains how the Application collects information about you and your responses to the cognitive tests which are run by the Application and how that information will be used (“**the Privacy Policy**”).

1) About the Application

The Application is intended to help with the conduct of research studies by allowing participants to take some or all of the study assessments without having to visit the research centre or site in person. We hope that this makes it more convenient for participants to take part in research and therefore helps researchers carry out research studies.

The Application has been developed by Cambridge Cognition Limited (“Cambridge Cognition”, “we”, “us” or “our”) and is being made available to you by, or on behalf of, the organisation(s) responsible for conducting the research studies (“the Researcher”).

2) About this Privacy Policy

Cambridge Cognition takes your privacy seriously and asks that you read this Privacy Policy carefully as it contains important information about what to expect when the Application collects personal information about you and how that personal information will be used.

3) Information that the Application collects about you

The Application collects information and enables participants to conduct tests which help the Researcher conduct a research study (“**Study**”) on a group of individuals (“**Participants**”).

The Application may prompt you for Personal Information which the Researcher believes relevant to the Study. Examples of this could include asking you to provide your name, gender, age, nationality or to give some information regarding your education, work or medical history. The Application may request contact information from you, such as your e-mail address and other contact details. Your responses are recorded by the Application.

Personal information is only collected if you choose to take part in the Study and volunteer the information requested by the Application.

The Study may require you to take a number of tests using the Application on a number of different occasions. Your responses to the tests are recorded by the Application.

The information that you provide may therefore be sufficient to allow you to be identified and may provide some details about your health. For these reasons, we and the Researcher need to be certain that you agree to our collecting, using and sharing the information you provide on the basis described in this Privacy Policy. In this privacy policy, we refer to the information you give to us and your responses to the tests carried out by the Application as “**Personal Information**”.

4) Age and capacity to participate in the Study

The Application is intended for use by adults able to give free and informed consent to the processing of their Personal Information.

We do not intend to collect Personal Information regarding individuals under the age of 18 or, if higher, the age of legal majority in the country in which you live. We do not intend to collect Personal Information regarding individuals who do not have capacity to provide free and informed consent.

If you are not an adult who is able to give free and informed consent, you should not submit information into the Application.

If you are concerned that your child or relative has provided Personal Information in circumstances not in accordance with this paragraph, please contact us (see Section 13).

If we become aware that Personal Information has been provided to us that goes against these principles we shall use reasonable efforts to remove such Personal Information and cancel the registration to the Application.

5) How will the information you provide be used?

Your Personal Information will be processed by us, our Group, agents and sub-contractors to enable you to take part in the Study, to communicate with you on any matter relating to your use of the Application and also to provide analysis and reports on the Study to the Researcher.

Your Personal Information may also be accessed by, and/or transferred to, the Researcher, its agents and sub-contractors to use for the purposes of the Study.

We, our Group, agents, and sub-contractors may use aggregate information and statistics for the purposes of monitoring the Application and to develop the Application and other current or future products and services. Where this takes place, the information will be de-identified so that the information cannot be used to identify you.

Your Personal Information will be processed by us for the duration of the Study and for the period of time afterwards that the Researcher needs to retain research records under applicable law or regulation after which we shall use reasonable efforts to de-identify it so that you can no longer be identified from it.

We do not use your Personal Information for marketing purposes without first seeking your approval.

We use the term "Group" in this paragraph and elsewhere in the Privacy Policy to refer to the family of companies that are under our control or (where applicable) under the control of the Researcher, such as subsidiary companies and parent companies. For example, our Group includes Cambridge Cognition Holdings plc, Cambridge Cognition, LLC and Cantab Corporate Health Limited.

6) Our use of cookies and other information-gathering technologies

The Application does not use cookies. It simply records the visits to the Application which are made from your computer or device.

7) How we protect the information

Personal Information will be collected, stored and accessed from our servers and the servers of our data processors.

We use reasonable efforts to safeguard your Personal Information, including the following measures:

- we carefully select and audit our data processors to ensure that there are adequate technical and organisational procedures in place to protect personal data;
- we enter into written contracts with them to create legally binding obligations with regard to compliance with applicable data protection laws and regulations;
- we encrypt data when it is (a) stored locally on the electronic device used to collect your Personal Information; and (b) when the data is transmitted to or from our data processors.

Your data is stored in a HIPAA (Health Information Portability and Accountability Act) and GDPR (General Data Protection Regulation) compliant data centre which is HITRUST certified.

8) Overseas Transfers

Your Personal Information may be transferred to countries outside the country where you live. These transfers are required to enable the Application to operate on an international basis because Participants, the Researcher, data processors and other persons able to access Personal Information in accordance with this Privacy Policy may be located in different countries.

Our data processors are currently located in the United States of America. We reserve the right to change our data processor and also to add or remove locations and countries where the Personal Information is processed.

If you are in the European Economic Area (being the European Union member states plus Norway, Iceland and Liechtenstein) (“**EEA**”), your information may be transferred to countries outside EEA, including the USA. In order to ensure the security of your information, we put in place written agreements with our data processors in countries outside the EEA. These agreements place obligations on the data processors to provide the same safeguards over your information as is required within the EEA.

By submitting your Personal Information you consent to these transfers for the purposes specified in this Privacy Policy.

9) Access to your information and updating and correcting your information

You have the right to request a copy of the Personal Information that we hold about you. If you would like a copy of some or all of your Personal Information, please send an email or letter to us at the address in see Section 13. We may make a small administrative charge for this service.

We want to ensure that your Personal Information is accurate and up to date. If any of the information that you have provided to us changes, for example if you change your email address, name or contact details, , please let us know the correct details by sending an email or letter to us.

You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

10) Transfer of the Study or Application

The Study may be run as a collaboration involving more than one Researcher or the Study may be transferred to another Researcher. If this happens, your Personal Information, may be shared with, or transferred to, those organisations collaborating in running the Study and they will be permitted to process the Personal Information as set out in accordance with the Privacy Policy.

If the Application is sold to another business, then the new owner of the Application would be permitted to process your Personal Information instead of Cambridge Cognition.

11) Your consent

By submitting your Personal Information to the Application you consent to the collection, use, transfer and other processing of your Personal Information as set out in this Privacy Policy.

If at any time you wish to withdraw your consent in respect of any further processing of your Personal Information, you may do so by sending a notice to us in writing by e-mail or letter at the e-mail or postal address set out below.

If you do withdraw your consent, this will take effect 30 days after receipt by us of your notice and we shall de-identify all your Personal Information within the Application so that it can no longer be used to identify you unless we, or the Researcher, are required to retain a record of your Personal Information in order to comply with legal requirements.

If you do withdraw your consent, we, and the Researcher, may continue to use such de-identified Personal Information or other non-identifiable information provided to us through your use of the Application on the basis set out in this Privacy Policy.

12) Links to other applications or websites

The Application may contain links to other applications or websites. This privacy policy only applies to the Application so if you link to other applications or websites you should satisfy yourself as to the terms of their own privacy policies.

13) Contact Details

If you wish to contact us to have your data anonymised, amended or have questions on this privacy policy you must use the contact details below referencing “web-based testing”

Postal Address:

Cambridge Cognition Limited
Tunbridge Court

Tunbridge Lane
Bottisham
Cambridge
CB25 9TU
United Kingdom

14) Ownership and licensing of the Application

The Application is the proprietary software of Cambridge Cognition and is protected by copyright and/or other intellectual property rights and is licensed strictly for you to use in connection with the Study. CANTAB and CAMBRIDGE COGNITION are trade marks of Cambridge Cognition.

The Application is not to be copied except where such copying is incidental to its normal use or where it is necessary for the purpose of back-up or operational security.

15) Changes to the Privacy Policy

We keep the Privacy Policy under regular review. If we change the Privacy Policy we will make those changes available so that you may be aware of the information we collect and how we use it at all times. We may make the changes to the Privacy Policy available to you by any of the following ways:

- posting to our website, currently at www.cambridgecognition.com; or
- updating the policy within the Application, where you continue to access the service;
- sending you an e-mail, where we have been provided with your e-mail address; or
- requesting that the Researcher provides you with a copy.

Any changes to the Privacy Policy may take effect from the earliest date on which we notify you by any of the methods described above or such later date as specified in the new version of the Privacy Policy. However, we may make changes to the Privacy Policy which have retrospective effect but such changes shall not limit your ability to withdraw your consent to the further processing of Personal Information.

CAMBRIDGE COGNITION LIMITED

Version 1.1

This Privacy Policy was last updated on 23rd January 2018