



## Article 13 EU GDPR

---

### **Article 13 EU GDPR Information to provide to Data Subject (DS) at the time personal data is collected**

H2O Clinical, LLC and Pharma Start, LLC dba Firma Clinical Research, located at 5440 N. Cumberland Ave., Suite 310, Chicago, Illinois 60656, United States of America hereinafter referred to as "FIRMA", is the Data Controller of personal data we collect about you as a candidate and/or as an employee.

Your personal data is important to us. All our employees and sub-contractors have been trained to data privacy and respect the principle of confidentiality. As per data privacy laws in the US and the General Data Protection Regulation in the European Union / European Economic Area and in the UK, we would like to inform you about the personal information we are collecting about you, why we collect them, how we process them, how long do we keep them, and how you can exercise your rights about your personal data.

#### **1. What data is collected about me?**

We collect your identity (first name, last name, id number), your contact details (phone, email address, postal address), justification of your education, and your CV.

If you are an employee, we collect all information required by legal obligations to produce the payslip and make the mandatory notifications to the authorities, for example, your Social Security Number or your Date of Birth.

FIRMA complies with the principle of minimization: we collect only the personal data that is needed.

#### **2. How will my data be handled?**

Your personal data will be processed by us in our human resource software whose databases are in the US. FIRMA might sub-contract part of the process to a human resource management company based in the US that we have carefully selected. Such an external company is bound by contract to comply with the data privacy laws mentioned above and is acting as a Data Processor.

At Firma, only employees from the Human Resource department will have access to your personal data.

For a candidate:

The legal basis for the processing of your personal data is the legitimate interest of Firma. The legitimate interest of Firma is to conduct its business.

For an employee:

The legal basis for the processing of your personal data is the existence of a legal obligation to produce payslips and to make mandatory reports to US work agencies.

#### **3. Who, other than Firma and the external sub-contractor, has access to my personal data?**

## Article 13 EU GDPR

---

It might happen that an inspector from the US Ministry of Work asks to access the records of some of our employees in case of an inspection.

### **4. Will my data be used for other purposes than for the recruitment process/ employment?**

If you are a candidate and are hired by us your personal data will be reused to meet the obligations of Firma for employees.

### **5. How long will my data be kept?**

As a candidate, we keep your resume and your other personal data for a maximum of three (3) years.

If you are an employee, per the law we have to keep your personal data for all your time at Firma plus one year after your departure.

Your data will be kept securely on our servers, according to best IT practices.

### **6. How can I exercise my rights on my personal data?**

If you would like to exercise your rights\* about your personal data, please contact our Data Protection Officer by email at [privacy@firmaclinical.com](mailto:privacy@firmaclinical.com) or Human Resources at [HR@firmaclinical.com](mailto:HR@firmaclinical.com).

(\*) Right to be informed (transparency), right to know and inquire about what personal data we have collected about you and to get a copy of such data (access), right to request correction or deletion of such personal data, right to object, right to restrict the processing (limitation), right of data portability, right to know if an automated decision is made.

NB: it is not possible to have all your data erased because per work laws, we must be able to prove evidence that you have been working for us.

If you still have questions, you can lodge a complaint with the US Department of Labor by calling the National Toll-Free Contact Center – Live assistance is available Monday through Friday from 8:00 a.m. to 8:00 p.m. Eastern Time by calling, 1-866-4-USA-DOL (1-866-487-2365); for other means of contact: <https://www.dol.gov/general/contact>