Last Updated: October 08, 2024

At Greenlight Guru (”Greenlight Guru Clinical”, ”we”, ”us” or ”our”) confidentiality and data protection is a high priority. This privacy policy sets out the guidelines for our processing of your personal data in the Greenlight Guru Clinical Product and provides you with the information you have the right to receive according to applicable data protection law. You must read the privacy policy before submitting your personal data to Greenlight Guru. Please note that we maintain a separate master Privacy Policy for other Greenlight Guru products and services, which may be access here: **Greenlight Guru Privacy Policy**

## Data Controller

The data controller for your personal data is:

SMART-TRIAL ApS (d.b.a. Greenlight Guru)
K. Christensens Vej 2L 9200
Aalborg SV
CVR no. 35 13 97 10

Greenlight Guru is headquartered in the United States of America and has offices in Europe. When users in the EEA, United Kingdom and Switzerland share, collect, upload to or store clinical data on the Greenlight Guru Clinical platform, we localize and process all such data within the European Union.

## 1. If you use our Clinical product

This section sets out the policy of Greenlight Guru’s processing of personal data regarding users of Greenlight Guru Clinical’s Product.

### 1.1 If you create a user account

**Types of personal data**

When you create a user account on our websites, Greenlight Guru collects, processes and stores the following personal data about you:

- Name, email address and phone number
- Address and Country
- Whether you have accepted to receive our newsletter
- Occupation, employer
- Staff ID
- IP address and geolocation
- Information about your internet connection, and the equipment you use to access our services

**Purposes of the processing**

Your personal data may be processed for the following purposes:

- Administration of user account
- Product security measures
- Statistics and analysis
- Product and service development
- Customer service and support

**Legal basis**
Greenlight Guru will mainly process your personal data based on one or more of the following legal bases:

*Legitimate interests:* The processing of your personal data will be based on our legitimate interest in, for instance, conducting statistics, analysis, as well as improving and developing our products and services (Article 6 (1) (f) of the General Data Protection Regulation).

*Contractual obligation:* We process your personal data with the purpose of complying with our agreement to deliver a user account to you (Article 6 (1) (b) of the General Data Protection Regulation).

**Retention period**
If your user account is associated with a clinical trial/study or a Greenlight Guru Clinical customer, we adhere to the data processing instructions provided by you or a Greenlight Guru Clinical customer.

Anonymized personal data may, however, be kept for a longer period of time.

## 2. Disclosure to other data controllers and transfer to data processors

To fulfill the purposes described above we may provide access to your personal data for third parties who, on the basis of a contractual relationship with Greenlight Guru, provide relevant services, e.g. IT-providers or email providers. Such service providers will only process personal data in accordance with our instructions pursuant to the data processor agreements entered into.

In connection with Greenlight Guru's development, the company structure may change, e.g. through a full or partial sale of Greenlight Guru. In case of a partial hand over of assets containing personal data, the legal basis for the related disclosure of personal data is, as a general rule, Article 6(1)(f) of the GDPR, as Greenlight Guru has a legitimate interest in handing over part of its assets as well as making commercial changes.

Aside from above, it is a general rule that your personal data is not disclosed to a third party without your permission. However, under certain circumstances and in accordance with applicable law, we may need to disclose your personal data to

- Police
- Lawyers
- Auditors

- Courts
- Public authorities
- Prospective buyers
- Affiliated companies
- We store and process clinical data in the EU. Personal data of our product users may, under certain circumstances, be processed in the United States in accordance with our master Privacy Policy. If your personal data is transferred to data processors or data controllers established in countries outside the EU/EEA which does not have an adequate level of protection, such transfer will be based on the EU Commission's standard contracts or binding corporate rules.

## 3. Your rights

- You have the right to access the personal data we process about you
- You have the right to object to our collection and further processing of your personal data, subject to the Data Processing terms under which your user account has been created.
- You have the right to have your personal data rectified and deleted, with certain statutory exceptions.
- Under certain circumstances you may also request to receive a copy of your personal data as well as the transmission of your personal data which you have provided us with to another data controller (data portability)
- You may, at all times, withdraw any consent you may have given. We will then delete your personal data, unless we can or must continue the processing on another basis.

**Questions or complaints**

If you have any questions in relation to this privacy policy or if you wish to make a complaint in connection to our processing of your personal data, please contact us:

SMART-TRIAL ApS
K. Christensens Vej 2L 9200
Aalborg SV Denmark
Email: clinical.info@greenlight.guru

If your complaint is not resolved by us and you wish to proceed with the case, you can send your complaint to the supervisory authority in your country. A list of European supervisory authorities is available **here.**

## 4. Changes to the privacy policy

We reserve the right to make changes to this privacy policy from time to time. When updated, the date at the top of the privacy policy will be updated accordingly. The, at all times, applicable privacy policy will be available at our websites.

# Greenlight Guru Clinical Product Privacy Policy

Version 3 - September 19, 2023
Version 2 - February 24, 2021
Version 1 - March 22, 2019