# **BRG's Privacy Policy**

This website, www.cgmp.global, is operated by and on behalf of Biotech Resources Group, LLC (**BRG**). BRG is committed to the protection of your personal information. This Privacy Policy sets out the basis on which we collect and use personal information about you as part of our business activities.

This Privacy Policy applies to personal information collected by BRG through this website, and to other information we may collect in the course of our business. It is not the exclusive description of how we process personal information. If you are a BRG owner or subconsultant, information on how BRG handles your personal data is provided in BRG's Employee Handbook. a subconsultant, subcontractor, or vendor, information on your rights and obligations regarding personal data provided to you by us are addressed in our written agreements. Unless we explain otherwise at the time, providing personal information that we request is optional and disclosures are made voluntarily.

If you are a prospective subconsultant, you may provide us with information about yourself, such as a resume/curriculum vitae, professional references, information about education and job background, and information about professional training and certifications. We may use this information for the purpose of employment consideration, and as otherwise set forth in any separate privacy statement or other notice made available to in connection with your application. We partner with ADP to process applications for employment.

### 1.0 HOW INFORMATION IS COLLECTED

When you interact with BRG website BRG does not collect the IP addresses and domain names of visitors, browser type, history of pages viewed and other usage information about your use of the website. Our website does not use Google Analytics service.

BRG also collects your voluntarily provided information when you email us about our services, employment or internship opportunities, register to attend a BRG event, download our publications, or by interacting with us on other business matters. All information submitted via the BRG Contact Form is considered an email function.

## 2.0 TYPES OF PERSONAL INFORMATION COLLECTED

Personal information means any information relating to a person that enables them to be identified either directly or indirectly. When submitted to BRG, personal information that we hold about you may include your contact details (e.g. name, phone number, address and email address), IP address, language, gender and location.

If you are a client, subconsultant, subcontractor, or vendor, personal information that we hold about you may include the same information listed above. BRG may request, via standard confidentiality agreements, that you provide additional information such as your company's legal status, date and place of incorporation, your company's related entities, ownership details, your relationship to government officials, your company's tax

identification numbers, country of origin, business and professional licenses, your company's surety, insurer, broker and insurance policies, and other information you consent to provide us for purposes of performing contracts or services.

We will take reasonable steps to ensure the personal information that we store is accurate, complete and up-to-date.

# 3.0 HOW PERSONAL INFORMATION IS USED

We will not share your personal information with external parties. We may use your information to:

- improve services provided by BRG
- to assess and respond to a complaint you might make to us
- for our own administrative purposes, including training our staff, conducting internal audits, improving our services or engaging in the sale, purchase or investment in the business
- if you are a client, subconsultant, subcontractor, or vendor, to perform services or carry out our contract with you
- for market research purposes
- to make informed decisions about business relationships and to prevent inadvertent engagement in illegal or corrupt practices
- to conduct investigations of suspicious or harmful activity
- to comply with BRG's regulatory and legal obligations
- to manage risks related to BRG's contracts and services
- to prevent or detect fraud or abuses of our website or systems
- for our other legitimate business interests.

If we wish to use your personal information for a purpose beyond that for which it was originally provided, we will ask for your consent or seek to rely on another valid legal ground to process your personal information in accordance with the applicable law. BRG does not sell personal information to others.

### 4.0 INFORMATION FOR MARKETING PURPOSES

Where you have consented to our use of your personal data for marketing purposes, we may use your information to conduct marketing and data analysis or to send you updates and news concerning BRG and its business partners. If at any time after you have consented to us using your information for marketing purposes and you wish us to stop using your information for these purposes, please contact us as provided below.

## 5.0 GROUNDS FOR PROCESSING

To process your data lawfully we need to rely on one or more valid legal grounds. These may include:

- Your consent to processing activities
- Our legitimate interests as a business, including but not limited to the uses set forth in Section 3.0 above

- Our compliance with a legal obligation to which BRG is subject;
- If you are a client, subconsultant, subcontractor, or vendor, because processing your personal information is necessary for the performance of a contract or services

### 6.0 DISCLOSURE OF YOUR PERSONAL INFORMATION

There are circumstances where we may wish to disclose or are compelled to disclose your personal information to third-parties. This will only take place in accordance with the applicable law, and, where applicable, in accordance with our written agreements with clients, subconsultants, subcontractors, and vendors. These circumstances include disclosure to:

- Subconsultants
- Subcontractors
- Vendors for the purpose of facilitating the performance of our services
- Service providers and consultants required for the protection of our business, including databases and systems used for business continuity reasons (including cloud service providers);
- Another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganization, change of legal form, dissolution or similar event;
- attorneys in connection with negotiation of a contract, dispute resolution, or other legal matter;
- tax advisors for purposes of tax filings, obtaining tax credits, negotiating tax liabilities, and other tax matters;
- public authorities where we are required by law to do so;
- any other third party where you have provided your consent.
- We will disclose your information to any person where required by law and any
  governmental authority if we believe in good faith that we are required to do so,
  or that it is required to prevent, detect, investigate or remedy improper conduct
  potentially affecting BRG.

### 7.0 INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

BRG stores and processes your personal data in the United States of America and elsewhere in the world. By using our website and services, you consent to your personal data being transferred to other countries that have different data protection rules than your country, including specifically the United States. Please contact us as provided below for more information about this.

### 8.0 RETENTION OF PERSONAL INFORMATION

Your personal information will be retained for as long as it is necessary to carry out the purposes set out in BRG's Privacy Policy, or as required by law. Our retention of data will be subject to periodic review. We may keep an anonymized form of your personal information, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

# 9.0 CONFIDENTIALITY AND SECURITY

BRG is committed to:

- seeking to safeguard all personal information that you provide to us
- seeking to ensure that it remains confidential and secure
- taking all reasonable steps to ensure that personal privacy is respected.

All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, technical and administrative safeguards to protect your personal information from misuse, unauthorized access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, subsidiary companies and third parties who need to know that information for the purposes set out in our Privacy Policy.

### **10.0 EU RESIDENT RIGHTS**

The EU GDPR provides EU residents with certain rights discussed below. EU residents may contact BRG as provided below regarding any of these rights and BRG will respond within a reasonable period, and within any period prescribed by law. Persons exercising these rights will be required to submit a proof of identity. If you are an EU resident, you have the right to:

- 1. Obtain a copy of your personal information. You have the right to obtain a copy of the personal information we hold about you by contacting us as directed above.
- 2. Correct your personal information. You may request that we correct any inaccurate and/or complete any incomplete personal information by contacting us as directed above. If we disagree and believe the information to be accurate and complete, we will advise you and include a notation on the record that you dispute the information's accuracy.
- 3. Withdraw your consent to processing. You may, as permitted by law, withdraw your consent to the processing of your personal information at any time by contacting us as directed above. Such withdrawal will not affect the lawfulness of processing based on your previous consent.
- 4. Object to processing. You may, as permitted by law, request that we stop processing your personal information by contacting us as directed above.
- 5. Erasure. You may request that we erase your personal information by contacting us as directed above. We will comply, unless there is a lawful reason for not doing so.
- 6. Lodge a complaint. We suggest that you first contact us as provided below regarding any questions or complaints in relation to your rights or how we process your personal information.

# **11.0 LINKS**

Our website may provide hyperlinks to websites owned and controlled by others. BRG is not responsible for the privacy practices of any website that it does not own or otherwise control.

# 12.0 THIRD PARTIES

Where you submit information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their information, the

reason you have provided it, how they can contact us, the terms of this policy and that they have consented to such collection, use and disclosure.

#### 13.0 COMPLIANCE WITH PRIVACY LAWS

BRG complies with the data protection and privacy laws to which it is subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time. Notwithstanding contrary terms in BRG's Privacy Policy, BRG accepts no obligations with respect to the handling of personal information other than those mandated by law in the country which has, or countries which have jurisdiction over BRG in any given circumstances.

#### 14.0 CHILDREN'S PRIVACY

BRG's sites and services are intended for a general audience and are not directed at individuals under the age of majority. We do not knowingly collect information from children or other individuals who are not legally able to contract with us. If we obtain actual knowledge that we have collected information from a child, we will promptly delete it, unless we are legally obligated to retain such data. If you believe that we have mistakenly or unintentionally collected information from a child, please contact us as provided below.

## 15.0 CHANGES TO THIS POLICY

We reserve the right to review this Privacy Policy from time to time, and to change this policy at any time and to notify you of those changes by posting an updated version of this policy on our website.

## 16.0 CONTACT US

For questions about BRG's Privacy Policy, please contact us by email at:

- bobv@cgmp.global
- or by mail at:
   505 Helene Street
   Gaithersburg, MD 20878
   Attention: Company Manager

During all correspondence, please provide us with your exact name, company, address, phone number and e-mail address (if applicable).