

# CCPA Privacy Notice for California Residents

**Effective Date: January 4, 2021**

Syneos Health (“we”, “us”, “our”) is an end-to-end, fully integrated Business-to-Business solutions company servicing our customers, who are primarily biopharmaceutical and health care organizations (our “**Customers**”). We are required by the California Consumer Privacy Act of 2018 (“**CCPA**”) to explain to California residents (“Consumers”) our online and offline practices with regard to how we collect, use and share their personal information, and the rights and choices we offer them regarding our handling of their personal information. If you wish to print this document, please click [here](#) for a printable format.

## Personal Information Defined

When we use the term personal information in this notice, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include:

- Consumer information that is lawfully made available from federal, state, or local government records.
- Consumer information that is de-identified or aggregated.
- Information generally excluded from the CCPA’s scope, including:
  - Personal information that we collect about Consumers in their capacity as job applicants, employees, owners, directors, officers, medical staff members, or contractors (Associates), to the extent we process their personal information in the context of their employment or engagement with us.
  - Emergency contact information our Associates provide to us, provided that such contact information is used solely as emergency contact information for the Associate.
  - Personal information that we need to administer benefits for Associates, provided we use such information for the purposes of administering benefits.
  - Personal information we obtain from Consumers who act as representative of other organizations and communicate with us or engage in transactions relating providing products and services to us or receiving products or services from us.
  - Personal information that is either directly covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), or health and medical information we process as a provider or as a business associate to a covered entity that is not covered by CMIA and/or HIPAA but that is maintained, used and disclosed in the same manner as health or medical information that is covered by these laws;
  - Personal information on that is processed for scientific research purposes, including clinical trials, provided that the information is processed subject to applicable ethics, confidentiality, privacy and security requirements;
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994; and
  - Other information subject to an exemption from the CCPA’s coverage.

## Personal Information We Collect, Use and Share

As we explain in our Privacy Notice:

- **Cookies and other Tracking Tools**

We use cookies and other tracking tools to analyze website traffic and facilitate advertising. These cookies and other tracking tools may be shared with others in connection with advertising. We honor your advertising choices, and if you would like to opt out of our (and our third party advertising partners’) use of cookies and/or other tracking tools, please review the instructions provided in the [Tracking Opt-Out](#) section below.

- **Directed Disclosures**

When doctors, candidates and other business representatives share their information with us in the context of interacting with us, it is with the understanding that we will broadly share their details with our actual and potential Customers. This is because our Customers are looking to provide services (e.g., therapies) to the businesses those individuals represent or obtain services from them (e.g., leading clinical trials, speaking at conferences, etc.). Facilitating these engagements is a core part of our business. We treat all doctors and other healthcare providers who visit our websites and provide information to us through our websites in their business capacity as representatives of their business (whether they act as sole proprietors or otherwise).

### **How we collect, use and share personal information about Consumers**

California residents have the right to opt out of the sale of their information by businesses that sell personal information. The CCPA defines a “sale” as the disclosure of personal information for monetary or other valuable consideration. We do not offer an opt out from the sale of personal information because we do not and have not within at least the last 12 months sold personal information that is subject to the CCPA’s sale limitation. The CCPA also requires that we state that we have no actual knowledge that we have sold personal information of California residents 15 years of age and younger.

The CCPA requires that companies disclose their collection and use of specific categories of personal information enumerated in CCPA. How and what personal information we collect about a Consumer, and the uses we make of the Personal Information we collect about Consumers, will vary and will depend upon our relationship with the Consumer. Below is a summary of how we currently collect, use and share personal information, and how we have used and shared the information in the preceding 12 months:

**Sources of Personal Information:** As we explain in our privacy notice, we may collect and further process information that you provide us directly or that you direct others to provide us; information that we obtain about you from your interactions with us; or information we obtain in the ordinary course of business. For example, we may obtain information about you from you or at your direction, such as when you provide it to us or request that someone else to do so; from systems, such as when you take actions online that our systems record; from others, such as from public sources or from widely-available sources; from our affiliates; from companies and organizations who help us with our business operations and marketing activities, such as data brokers and data analytics providers, advertisers, and social networks, parties involved in mergers, acquisitions and transfers of some or all of a business; from companies and organizations who help us manage our Associates who are not employed by us; and from our Customers and business partners.

**Categories of Personal Information:** Over the past 12 months, the categories of personal information we collect from Consumers, the uses we make of the personal information we collect, and the parties to whom we disclose this information are summarized below.

#### **Biometric Information**

An individual’s physiological, biological or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a face print, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information

- To whom do we disclose personal information: Service Providers

#### **Commercial Information**

Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- To whom do we disclose personal information: Customers and Business Providers, Service Providers, Advertising Partners

#### Education Information

Personal information from an educational record, which could include: a student's name, the names of the student's parent or other family members, the address of a student or student's family, a student's personal identifier (e.g., SSN, student number), other indirect identifiers of the student (e.g., date of birth, place of birth, mother's maiden name), other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty, or information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers, Advertising Partners

#### Financial Information

Bank account number, debit or credit card numbers, insurance policy number, and other financial information.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers

#### Geolocation Data

Precise location, e.g., derived from GPS coordinates or telemetry data.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers, Advertising Partners

#### Identifiers

Real name, alias, postal address, unique personal identifier, customer number, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers, Advertising Partners

#### Inferences

The derivation of information, data, assumptions, or conclusions from any other category of Personal Information to create a profile about a person reflecting the person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers, Advertising Partners

#### Internet or Network Information

Browsing history, search history, and information regarding a person's interaction with an Internet website, application, or advertisement.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers, Advertising Partners

### Medical Information

Personal information that relates to an individual's health or healthcare, including health insurance information.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers

### Unique Identifiers

A unique identifier or other persistent identifier that can be used to recognize a person, family or device, over time and across different services, including but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, mobile ad identifiers, or similar technology; customer number, unique pseudonym, or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers (i.e., the identification of a person or a device to a degree of certainty of more probable than not) that can be used to identify a particular person or device.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers, Advertising Partners

### Physical Description

An individual's physical characteristics or description (e.g., hair color, eye color, height, weight).

- To whom do we disclose personal information: Customers and Business Partners, Service Providers

### Professional or Employment Information

This term is not defined in the CCPA, but likely includes any information relating to an Associate's current, past or prospective employment, engagement, or professional experience (e.g., job history, performance evaluations).

- To whom do we disclose personal information: Customers and Business Partners, Service Providers

### Protected Classification Characteristics

Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

- To whom do we disclose personal information: Customers and Business Partners, Service Providers

### Sensitive Personal Information

SSN, driver's license, state ID card or passport, Account log in or financial account information in combination with security codes or passwords, precise geolocation information, contents of mail, email or text messages.

- To whom do we disclose personal information: Customers and Business Partners, Service Providers

### Sensory Information

Audio, electronic, visual, thermal, olfactory, or similar information.

- To whom do we disclose personal information: Customers, Service Providers

We may also disclose all personal information (a) to our affiliates, (b) to comply with federal, state, or local laws; (c) to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; (d) to cooperate with law enforcement agencies concerning conduct or activity that we believe may violate federal, state, or local law, (e) when we sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction),

or (f) to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**The Uses We May Make of Personal Information:** How and why we use Personal Information may vary based on our relationship with a Consumer. Below is a summary of the uses we make of Personal Information.

Improve and Develop our Business.

- Conduct market research and engage in marketing activities
- Provide learning opportunities, such as webinars
- Develop and improve our products and services
- Support customer relationship management
- Prepare for or transact mergers, acquisitions, or business restructurings or transfers

Provide, Manage, and Receive Products and Services.

- Process transactions associated with our services
- Provide support related to our services

Operate our Business.

- Manage and operate our facilities and infrastructure
- Perform accounting, monitoring, and reporting
- Audit and review our operations
- Enable information security and due diligence processes
- Enable the use of service providers for business purposes

Comply with Legal and Compliance Requirements.

- Investigate allegations of wrongdoing
- Comply with laws, regulations, policies, procedures, standards, and contractual obligations
- Pursue or defend legal claims and disputes
- Comply with requests from courts, regulators, or law enforcement, such as subpoenas and court orders

Interact with and Manage Associates.

- Process information from recruiters
- Process employment applications
- Onboard and manage employees
- Engage and interact with non-employee Associates
- Receive feedback from Associates on working environment
- Provide benefits to employees and dependents, including healthcare and retirement plans
- Manage leave and evaluate and provide accommodations
- Manage pay and other compensation activities

Protection of Our Company and Others.

- Protect the security of our networks, information we process, and our facilities
- Enforce our policies
- Protect our Associates and visitors safety

**California Residents' Privacy Rights**

The CCPA grants Consumers with certain rights, which are subject to certain limitations and exceptions. This section describes these rights. If we are not able to complete some or all of a Consumer's verifiable consumer request, we will communicate the reason to the Consumer in writing. We treat all doctors and other healthcare providers who visit our websites as representatives of their business (whether sole proprietor or otherwise). We receive information about them in their business capacity, and this section does not apply to information related to such business contacts.

- **Information.** Consumers can request, twice every 12 months, information about the personal information we have collected about them and how we have used and shared their Personal Information during the past 12 months. We have made this information available to California residents without having to request it by including it in this notice, above.
- **Access.** Consumers can request, twice every 12 months, a copy of the personal information that we have collected about them over the past 12 months. In certain cases, we are not permitted by the CCPA to provide you with certain sensitive information in response to an access request, such as your social security or driver's license number.
- **Deletion.** Consumers can ask us to delete the personal information that we have collected from them. In certain circumstances, the CCPA allows us to deny Consumer requests to delete their personal information, such as where we need the information to complete a transaction for which the personal information was collected or where we need the personal information to comply with a legal obligation.

Consumers are entitled to exercise the rights described above free from discrimination.

#### How to Submit a Verifiable Consumer Request

- **To request access to or deletion of personal information, Consumers can contact us as follows:**
  - call 866-875-1569
  - email [data.privacy@syneoshealth.com](mailto:data.privacy@syneoshealth.com)
  - website: <https://www.syneoshealth.com/california-rights>
- **Identity verification.** The CCPA requires us to verify the identity of the individual submitting a Consumer request to access or delete personal information before providing a substantive response to the request. Where possible, we will attempt to verify your identity by asking you to confirm information that we have on file about your or your interactions with us. Where we must ask for additional personal information to verify your identity, we will only use it to verify your identity or your authority to make the request on behalf of another consumer. You do not need to create an account with us to exercise your rights
- **Authorized agents.** You can designate an "authorized agent" who has registered with the California Secretary of State to submit verifiable consumer requests on their behalf. You can also make a Consumer request on behalf of your minor child. We will require the authorized agent to have a written authorization confirming that authority.

#### How We Respond to Verifiable Consumer Requests

We will acknowledge receipt of your verifiable consumer request within 10 days of our receipt of your request, and we will endeavor to substantively respond within 45 days of our receipt of your request. If we need to extend our response time (up to 90 days from receipt of your request), we will inform you in writing of our reasons for doing so. We will deliver your personal information via your online account with us, if you have one, or by other secure electronic means. If we are unable to process your verifiable consumer request in whole or in part, we will explain our reasons for doing so.

Please note that we do not typically charge a fee to respond to verifiable consumer requests unless they are excessive, repetitive, or manifestly unfounded. If we determine that your verifiable consumer request warrants the assessment of a fee, we will inform you of the reasons supporting our determination and provide you with our estimate of the costs to fulfill your request before we take action to enable you to determine whether you would like us to complete your request.

## Requesting Additional Information

If you have any questions or comments about this notice or how we handle personal information, you may contact us via mail at:

Attn: Privacy Office  
Syneos Health  
1030 Sync Street  
Morrisville, NC 27560  
United States of America

You may also contact us via email at: [data.privacy@syneoshealth.com](mailto:data.privacy@syneoshealth.com).

## Changes to This Privacy Notice

We may periodically update this notice. When we post changes to this notice, we will also revise the “Last Updated” date appearing at the top of the notice. If there are material changes to this notice, we will notify you by e-mail or by posting a notice on our home page. We encourage you to review this notice periodically to be informed of how we are using your information and to be aware of any changes to it. Your continued use of the Sources after the posting of any amended notice shall constitute your agreement to be bound by any such changes. Any changes to this notice are effective immediately after we post it.

## Tracking Opt-Out Guide

Like many companies online, we use services provided by Google, Facebook and others companies that use tracking technology. These services rely on online tracking technologies – such as cookies and web beacons – to collect directly from your device information about your browsing activities, about your interactions with websites, and about the device you are using to connect to the Internet. There are a number of ways to opt out of having your online activity and device data collected through these services, which we have summarized below:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).
- **Blocking advertising ID use in your mobile settings.** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.
- **Using privacy plug-ins or browsers.** You can block our websites from setting cookies used for interest-based ads by using a browser with privacy features, like [Brave](#), or installing browser plugins like [Privacy Badger](#), [Ghostery](#) or [uBlock Origin](#), and configuring them to block third party cookies trackers.
- **Platform opt-outs.** The following advertising partners offer opt-out features that let you opt-out of use of your information for interest-based advertising:
  - Google: <https://adssettings.google.com>
  - Facebook: <https://www.facebook.com/about/ads>
- **Advertising industry opt-out tools.** You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:
  - Digital advertising Alliance: <http://optout.aboutads.info>
  - Network Advertising Initiative: <http://optout.networkadvertising.org/?c=1>