



# PRIVACY STATEMENT

## **Background**

This privacy statement tells you about how we will use your email address and any other personal data that is collected about you on this webpage or when you interact with us when deciding whether to participate in the following study: prospective, exploratory, observational, decentralized, single arm study with midlife women in the UK who participate in a 90-day menopause scientific wellness pilot program: enhancing wellbeing through personalized lifestyle awareness, nutrition supplementation, sleep and stress management (the “**Study**”).

The Study is sponsored by PhenomX Health SA (“**PhenomX**”) and Essity UK Limited (“**Essity**”). Essity will not process any personal data about you in connection with the Study. PhenomX may provide Essity with anonymised data about the Study from time to time.

However, the personal data that is collected about you on this webpage will be captured and processed by Castor (Ciwit B.V, Amsterdam, The Netherlands), an eConsent Platform Provider that has been appointed by Essity. Whilst Essity will not process any personal data about you in connection with the Study, Castor is technically processing personal data about you as a processor on behalf of Essity as the controller. Essity will not have access to the personal data processed by Castor or the eConsent Platform.

Castor complies with all applicable laws and regulations, including ICH E6 GCP, 21 CFR Part 11, EU Annex 11, General Data Protection Regulation (GDPR), national and international standards, ISO 9001 and ISO 27001. By using Castor, PhenomX and Essity are enabled to comply with these laws and regulations. Castor is a validated system approved by external auditors.

## **How and Why Your Personal Data Will Be Processed**

We will only use your personal data where we have a lawful basis to use it. We will use your personal data for the legitimate interests of providing you with further information about the Study to enable you to decide whether to participate in the Study and giving you the ability to provide explicit consent to participate in the Study if you choose to do so.

If you decide to participate in the Study, you will be provided with a separate privacy policy within the subject information available on the eConsent Platform (the “**Study Privacy Policy**”). The Study Privacy Policy will explain how your personal data will be processed during your participation in the Study.

You do not have to give us any personal data on this webpage but, if you do not provide us with certain information, you may not be able to access the eConsent Platform or participate in the Study.

Unless and until you give your explicit consent to participate in the Study in the eConsent Platform, your personal data will not be shared with anyone outside of Castor and only limited authorized investigational team members at Castor will be able to access your personal data.

If you decide to participate in the Study, your personal data will be retained and processed in accordance with the Study Privacy Policy. If you no longer wish to participate in the study please contact Castor ([support@castoredc.com](mailto:support@castoredc.com)) and they will delete your personal data unless Castor may also keep hold of some of your personal data to deal with legal claims or if they are required to do so for legal purposes, for example, to meet their legal or regulatory requirements.

### **Your Rights**

You have the following rights in relation to the personal information we hold about you, to request:

- access to the personal data we hold about you (commonly known as a "data subject access request") including a copy of it;
- the correction of the personal information that we hold about you if it is incomplete or inaccurate;
- the deletion or removal of personal data we hold about you where there is no good reason for us continuing to process it or where you have exercised your right to object to processing (see below);
- for our processing of your personal information to be restricted in certain circumstances, for example if you want to establish its accuracy or the reason for processing it;
- to obtain a copy of the personal information you've provided us with and to reuse it elsewhere or to ask us to transfer it to a third party of your choice; and
- to withdraw any consent you have provided to our use of your personal data. Where you withdraw consent, we will stop using your data for the specific purpose, unless we have an alternative legal basis to use it.

Where we are processing your personal data on the basis of our legitimate interests, you can ask us to stop processing it and we must do so, unless we believe we have an overriding legitimate reason to continue processing your personal data or we need to process it for the establishment, exercise or defense of legal claims.

If you are dissatisfied with how we have handled your personal data, you have the right to make a complaint to your data protection regulator and we will work with them to resolve it. In the UK, this is the Information Commissioner's Office (ICO). You can make a complaint to the ICO by calling their helpline on 0303 123 1113 or on their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns). We would, however, appreciate the chance to deal with your concerns before you approach the ICO or, (if you're based outside of the UK, your data protection regulator), so please do contact us in the first instance using the contact details below.

If you have any queries, comments or requests regarding this privacy statement, you have a complaint or you would like to exercise any of your rights set out above, you can contact us by email at [wecare@phenomX.ch](mailto:wecare@phenomX.ch).