

Data Protection Policy for Studies Involving Personal Data

Reason for the Policy:

Certain research projects require compliance with a foreign privacy framework which require additional protections for Personal Data (as that term is defined in the applicable framework (e.g. European Union's General Data Protection Regulation (GDPR), China's Personal Information Protection Law (PIPL), South Korea's Personal Information Protection Act). When such a requirement applies, the campus will be required to comply with this policy and any other requirements of the applicable project.

Statement of Policy:

By undertaking a project with a framework that requires adherence to a foreign data protection regulation, the campus agrees to undertake the following:

- To comply with the laws applicable to the activities of the project at the campus in relation to the protection of the Personal Data.
- The campus shall maintain appropriate technical and organizational security measures to protect the confidentiality and security of Personal Data.
- The campus will ensure that any collection, handling, transportation and retention of Personal Data in connection with a Study is carried out in accordance with the Protocol, the informed consents of Subjects, and applicable laws and in such a way as to ensure that the security, integrity, quality and identity of the Personal Data is maintained at all times.
- To the extent that any collaborator or Sponsor has additional responsibilities under applicable laws with respect to Personal Data, the campus shall reasonably assist the collaborator or Sponsor to discuss appropriate measures, including assisting in responding to any requests concerning Personal Data, insofar as they do not conflict with U.S. and/or N.Y. laws.
- The campus shall promptly notify the collaborator or Sponsor upon becoming aware of any withdrawal of informed consent that may affect the use of Personal Data.
- To the extent applicable, the campus shall ensure access, in compliance with all security, patient protection/confidentiality, U.S. law, and infection control procedures, to its facilities to collaborator/Sponsor, governmental authorities, auditors, or advisors as needed to ascertain Institution's compliance with its obligations towards Personal Data.
- The campus shall promptly and without undue delay, notify Sponsor of any security breach concerning the loss, theft, or disclosure of any data of Subjects. Further, to the extent practical, Institution shall indicate to Sponsor the nature of the breach, and the number of Study subjects impacted. Institution will work with Sponsor to minimize the impacts of any such security breach.

- The campus shall ensure that it has an appropriate basis for collecting/handling the Personal Data as required by the applicable framework.
- The campus shall, consistent with applicable U.S. based and N.Y. state laws, collect the minimum amount of Personal Data necessary and store it for as short of a period as necessary to address the needs of the project. In the event that U.S. and N.Y. based laws differ in retention requirements, the campus shall ensure that the collaborator/Sponsor is aware of and consents (in writing) to the domestic requirements before any project is undertaken at the campus.
- The campus shall ensure that only staff that have been trained how to handle Personal Data in accordance with the applicable framework will be utilized in the performance of the project.

No other use (including secondary use) of the Personal Data shall occur unless the requirements have been met under the applicable framework (including but not limited to additional consent requirements), or unless otherwise required by applicable law.