

# Website Privacy Policy

05 March 2026

## 1. Introduction

### 1.1. Important information and who we are

Welcome to Research Grid Ltd's ("**R.grid**") Privacy and Data Protection Policy ("**Privacy Policy**").

At Research Grid Ltd. ("**we**", "**us**", or "**our**") we are committed to protecting and respecting your privacy and Personal Data in compliance with the law and guidelines of the EU General Data Protection Regulation ("**GDPR**") and Data Protection Act 2018 ("**DPA**").

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights, how the law protects you, and inform our employees and staff members of all their obligations and protocols when processing data.

The individuals from which we may gather and use data can include:

- Participants/ Patients
- Customers
- Third parties connected to your customers

and any other people that the organisation has a relationship with or may need to contact.

This Privacy Policy applies to all our employees and staff members and all Personal Data processed at any time by us.

### 1.2. Who is your Data Processor and Data Protection Officer

Research Grid Ltd. is your Data Processor ("**Processor**") and is responsible for processing your Personal Data.

We have appointed a data protection officer ("**DPO**") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights surrounding your Personal Data please contact the DPO using the details set out below:

Full name: Amber Hill

Email address: [dpo@rgrid.tech](mailto:dpo@rgrid.tech)

Postal address: 13 The Close, Norwich, NR1 4DS United Kingdom.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 1.3. Processing Data on Behalf of a Processor and Sub-Processors' responsibility to you

In discharging our responsibilities as a Data Processor we have employees who will deal with your data on our behalf (known as “**Sub-Processors**”). Therefore, the responsibilities described below may be assigned to an individual, or may be taken to apply to the organization as a whole. The company and our Processors have the following responsibilities:

- Ensure that all processing of Personal Data is governed by one of the legal bases laid out in the GDPR (see 2.2 below for more information on those bases);
- Ensure that Sub-Processors authorized to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk associated with the processing of Personal Data;
- Obtain the prior specific or general authorisation of the main Processor before engaging another Sub-Processor;
- Assist the Processor in the fulfillment of the Processor's obligation to respond to requests for exercising the data subject's rights;
- Make available to the Processor all information necessary to demonstrate compliance with the obligations laid down in the GDPR and allow for and contribute to audits, including inspections, conducted by the Processor or another auditor mandated by the Processor;
- Maintain a record of all categories of processing activities carried out on behalf of a Processor;
- Cooperate, on request, with the supervisory authority in the performance of its tasks;
- Ensure that any person acting under the authority of the Processor who has access to Personal Data does not process Personal Data except on instructions from the company;
- Notify the Processor without undue delay after becoming aware of a Personal Data Breach;
- Designate a data protection officer where required by the GDPR, publish their details and communicate them to the supervisory authority; and
- Support the data protection officer in performing their tasks by providing resources necessary to carry out those tasks and access to Personal Data and processing operations, and to maintain their expert knowledge.

## 2. Legal Basis for Data Collection

### 2.1. Types of Data / Privacy Policy Scope

**“Personal Data”** means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Not all of the following types of data will necessarily be collected from you but this is the full scope of data that we collect and when we collect it from you:

- **Profile/Identity Data:** This is data relating to your first name, last name, gender, date of birth, ethnicity, sexual orientation and other demographic information.
- **Contact Data:** This is data relating to your phone number, addresses, email addresses, phone numbers.
- **Marketing and Communications Data:** This is your preferences in receiving marketing information and other information from us.
- **Billing Data:** This is information relating to your debit and credit card information such as the name attached to your payment details and your billing address.
- **Financial Data:** These are your banking details e.g. your account number and sort code.
- **Transactional Data:** This is information of details and records of all payments you have made for our services or products.
- **Technical Data:** This is your IP address, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use to engage with us.
- **Customer Support Data:** This includes feedback and survey responses.
- **Usage Data:** information about how you use our website, products and services.

We also collect, use and share Aggregated Data such as how often specific words are used. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

We may also aggregate data to enable research or analysis so that we can better understand and serve you and others. For example, we may conduct research on your demographics and usage. Although this aggregated data may be based in part on Personal Data, it does not identify you personally. We may share this type of anonymous data with others, including service providers, our affiliates, agents and current and prospective business partners.

For the purposes of our business we also collect what is known under the GDPR as special categories of Personal Data. We collect the following types of special Personal Data:

- Health Data: Information about health, including any medical condition, health and sickness records

In order to collect this special kind of data we need enhanced legal justifications beyond the ordinary legal justifications under the GDPR. We explain which justifications we rely on in paragraph 2.2 below.

## 2.2. The Legal Basis for Collecting That Data

There are a number of justifiable reasons under the GDPR that allow collection and processing of Personal Data. The main avenues we rely on are:

- **“Consent”**: Certain situations allow us to collect your Personal Data, such as when you Consent tick a box that confirms you are happy to receive email newsletters from us, or ‘opt in’ to a service.
- **“Contractual Obligations”**: We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.
- **“Legal Compliance”**: We’re required by law to collect and process certain types of data, such as fraudulent activity or other illegal actions.
- **“Legitimate Interest”**: We might need to collect certain information from you to be able to meet our legitimate interests - this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your address, so that we know where to deliver something to, or your name, so that we have a record of who to contact moving forwards.

For the special categories of data that we collect, the enhanced legal justification we rely on is:

- (a) the data subject has given explicit consent to the processing of such Personal Data for one or more specified purposes (**“Explicit Consent”**)
- (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the processor or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject (**“Necessity”**);
- (c) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject (**“Research”**).

### 3. How We Use Your Personal Data

#### 3.1. Our Uses

We will only use your Personal Data when the law allows us to. Set out below is a table containing the different types of Personal Data we collect and the lawful basis for processing that data. Please refer to section 2.2 for more information on the lawful basis listed in the table below.

Examples provided in the table below are indicative in nature and the purposes for which we use your data may be broader than described but we will never process your data without a legal basis for doing so and it is for a related purpose. For further inquiries please contact our Data Protection Officer.

Activity	Type of data	Legal Justification	Lawful basis for processing data
When a customer signs up for TrialEngine or when a customer logs into TrialEngine;	Contact Data	Necessity	We need to process this data so that we can allow customers to create and log into TrialEngine to use our services.
When a customer purchases services directly on TrialEngine or is invoiced for TrialEngine's services;	Billing Data	Necessity	We need to process this data so that we know who to and where to charge for the services you have purchased
When a customer submits a contact request or user support requests.	Contact Data	Necessity	We need to process this data so that we can respond to customers' queries and solve technical issues.
When a customer opts-in or out of services to search TrialEngine's libraries or database;	Profile/Identity Data	Profile Identity Data	We process this data you've selected to be public or private on TrialEngine.
When a customer opts-in or opts-out of TrialEngine's marketing communications	Marketing and Communications Data	Consent	We send emails to notify you of new services or updates from time to time.
When a person adds information in their profile related to health	Profile/Identity Data	Explicit Consent	We process the data that a person voluntarily adds to their personal profiles on TrialEngine to create the profile and if the person opts-in or opts-out of making this information publicly searchable or privately held on the TrialEngine's databases.

### 3.2. Change of Purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Protection Officer.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 4. Your Rights And How You Are Protected By Us

### 4.1. What Control Do I Have Over R.grid's (TrialEngine) Use Of My Personal Data?

You may delete your account at any time – this will remove your account page from our systems and our related software.

We guarantee this will delete all stored data.

Your account information will be protected by a password for your privacy and security. You need to prevent unauthorized access to your account and personal information by selecting and protecting your password appropriately and limiting access to your computer or device and by signing off after you have finished accessing your account.

You can access information associated with your account by logging into your account you created with us.

*California Privacy Rights: Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to [am@rgrid.tech](mailto:am@rgrid.tech).*

### 4.2. How Does R.grid (TrialEngine) Protect Customers' Personal Data?

We are concerned with keeping your data secure and protecting it from inappropriate disclosure. We implement a variety of security measures to ensure the security of your Personal Data on our systems, including the adoption of state-of-the-art security protocols and encryptions of data within our databases. Any Personal Data collected by us is only accessible by a limited number of employees who have special access rights to such systems and are bound by obligations of confidentiality. We systematically identify and minimize the data protection risks of any new feature or service that involves processing of personal data. Each new feature or service is rigorously tested, evaluated and assessed to ensure safety of your data and mitigate risks. If and when we use subcontractors to store your data, we will not relinquish control of your Personal Data or expose it to security risks that would not have arisen had the data remained in our possession. However, unfortunately no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of R.grid (TrialEngine) to intercept or access transmissions or private communications unlawfully. While we strive to protect your

Personal Data, we cannot ensure or warrant the security of any Personal Data you transmit to us. Any such transmission is done at your own risk. If you believe that your interaction with us is no longer secure, please contact us.

#### 4.3. How to Request your Data and the Process for Obtaining it

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, if your request is clearly unfounded, we could refuse to comply with your request.

We may need to request specific information from you to help us confirm your identity and ensure you have the right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## 5. Your Data and Third Parties

### 5.1. Will We Share Your Data With Third Parties?

We may also share Personal Data with interested parties in the event that R.grid (TrialEngine) anticipates a change in control or the acquisition of all or part of our business or assets or with interested parties in connection with the licensing of our technology.

If R.grid (TrialEngine) is sold or makes a sale or transfer, we may, in our sole discretion, transfer, sell or assign your Personal Data to a third party as part of or in connection with that transaction. Upon such transfer, the Privacy Policy of the acquiring entity may govern the further use of your Personal Data. In all other situations your data will still remain protected in accordance with this Privacy Policy (as amended from time to time).

We may share your Personal Data at any time if required for legal reasons or in order to enforce our terms or this Privacy Policy.

## 6. How Long Will We Retain Your Data For?

- 6.1. We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your Personal Data for a longer period than usual in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## 7. Age Limit For Our Users

- 7.1. You must not use R.grid (TrialEngine) unless you are aged 16 or older. If you are under 16 and you access R.grid (TrialEngine) by lying about your age, you must immediately stop using R.grid (TrialEngine). This website is not intended for children and we do not knowingly collect data relating to children.

## 8. International Transfer Of Data

- 8.1. Your information may be stored and processed in the US or other countries or jurisdictions outside the US where R.grid (TrialEngine) has facilities. We are currently storing data in the UK and so, by using R.grid (TrialEngine) , you are permitting and consenting to the transfer of information, including Personal Data, outside of the US.

## 9. Interpretation

- 9.1. All uses of the word "including" mean "including but not limited to" and the enumerated examples are not intended to in any way limit the term which they serve to illustrate. Any email addresses set out in this policy may be used solely for the purpose for which they are stated to be provided, and any unrelated correspondence will be ignored. Unless otherwise required by law, we reserve the right to not respond to emails, even if they relate to a legitimate subject matter for which we have provided an email address. As a matter of common sense, you are more likely to get a reply if your request or question is polite, reasonable and there is no relatively obvious other way to deal with or answer your concern or question (e.g. FAQs, other areas of our website etc.). Our staff are not authorised to contract on behalf of R.grid (TrialEngine) , waive rights or make representations (whether contractual or otherwise). If anything contained in an email from a R.grid (TrialEngine) address contradicts anything in this policy, our terms or any official public announcement on our website, or is inconsistent with or amounts to a waiver of any R.grid (TrialEngine) rights, the email content shall be read down to grant precedence to the latter. The only exception to this is genuine correspondence expressed to be from the Research Grid Ltd. legal department.

TrialEngine is powered by Research Grid Ltd.

## 10. Notification Of Changes And Acceptance of Policy

- 10.1. We keep our Privacy Policy under review and will place any updates on this webpage. This version is dated 05 March 2026. By using R.grid (TrialEngine), you consent to the collection and use of data by us as set out in this Privacy Policy. Continued access or use of R.grid (TrialEngine) shall constitute your express acceptance of any modifications to this Privacy Policy.

## 11. Consent For Processing Your Personal Information

- 11.1. By replying to company communication and accepting the system Privacy Policy you hereby consent to Research Grid Ltd. processing and storing your personal data for the purpose of the system use and relevant communication in compliance with the GDPR. For more information please see our Privacy Notice.

## 12. Privacy Notice (Based On Consent)

- 12.1. At Research Grid Ltd. we are committed to protecting your privacy. This policy applies when we are acting as a controller of personal data, i.e. where we have determined the purposes and means of the processing of that personal data.
- 12.2. We will process your personal data for the system use or other relevant communication. The legal basis for this processing is your consent.

- 12.3. We will store your personal data relating to the system use or other relevant communication.) for two years following the consent opt-in procedure.
- 12.4. We will share your personal data with third parties, such as sub-processors, only to the extent that the disclosure is reasonably necessary for the relevant process.
- 12.5. Whenever we transfer personal information to countries outside of the UK or the European Economic Area, we ensure that the information is transferred in accordance with this Privacy Notice and as permitted by the applicable laws on data protection. We rely on European Commission adequacy decisions or use contracts with standard safeguards published by the European Commission (**[available here](#)**) and similar measures under UK laws for such transfers.
- 12.6. As you are providing us with your personal data, it is important to us that you are aware of the following rights that you have in relation to our processing of that personal data.
- You can withdraw your consent to our processing of your personal data at any time.
  - You can be provided with a copy of any personal data concerning you that we process, unless that would affect the rights and freedoms of others. You can also be provided with information on how that personal data is processed by us.
  - You can ask us to provide your personal data, either to yourself or to another data controller, in a structured, commonly used and machine-readable format.
  - You can have us rectify any personal data of yours that we hold that is inaccurate or incomplete. In certain circumstances, you can also ask us to erase or restrict the use of any of your personal data that we process.
- 12.7. You can exercise any of the rights listed above by contacting us using the details at the bottom of this notice. If you are unhappy with any aspect of how we processed your personal data or your request to exercise a right, you can lodge a complaint with the Information Commissioner's Office.
- 12.8. Research Grid Ltd. is incorporated and registered in England and Wales with company number 11479455 and whose registered office is at 13 The Close, Norwich, NR1 4DS United Kingdom.
- 12.9. We are contactable by email at [team@rgrid.tech](mailto:team@rgrid.tech) or [community@rgrid.tech](mailto:community@rgrid.tech).