

# McCloud Consulting Group Online Privacy Policy

*This Privacy Policy Statement explains how and for which purpose MCG collects, holds, uses and discloses Personal Information. It applies to all Personal Information of individuals including but not limited to customers, suppliers, vendors, MCG personnel, clinical trial participants, and clinical investigators.*

## **How we collect your personal information:**

What kind of personal information we collect about you depends on your involvement with MCG and may include details such as your name, mailing address, phone number or email address.

We collect this information when we ask you for it and you – or others on your behalf or authorized by you – provide it to us. Where you prefer that we do not collect your personal information, we may not be able to provide assistance and undertake activities that we would otherwise provide or undertake.

Where reasonably possible, we seek to work with information and records from which personal information has been removed.

When we use and disclose personal information, we comply with privacy laws and requirements.

We also collect information that may or may not include your personal information, through technology and tools that tell us when a computer or device has visited or accessed our content.

## **How we collect clinical trials information:**

As a world class Biometrics Australian Clinical Research Organisation servicing Australia, Asia Pacific and beyond, we collect, host and analyse significant quantities of health data and bio-medical samples relating to participants of clinical trials on behalf of our clients.

If you participate in one of these clinical trials, you will be asked to provide express written consent to the manner in which your personal information will be collected, used, transferred, accessed and/or disclosed in connection with the research related to the trial.

Generally, MCG only receives de-identified information relating to participants in clinical trials from physicians and investigators. De-identified means that directly identifiable information such as your name and residential address are replaced with a code. MCG does not have the ability to tie a code to your name, only study doctors and authorized personnel may access named subject records.

## **How we use your personal information**

We use your personal information for our activities and business, and to assist in our efforts to expand and improve our services.

Examples include:

- providing information about our services, and responding to inquiries about them;

- for a business or professional relationship we may have with you, including to promote our services and activities that we consider may be of interest to you, unless you tell us not to do so;
- for our everyday business purposes that involve use of personal information such as analysing our records of your use of our website.

### **How we store and disclose your personal information**

As a globally operating company, MCG may store, access, and analyse information on different servers and in different countries. Your personal information may therefore be held and processed overseas by one of our business partners, clients or service providers. In such a case we take steps to ensure that your personal information is treated the same way we would treat it; to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we store in Australia as well as overseas.

We endeavour to keep records of personal information up to date, accurate and complete, and only as long as it's needed. From time to time special circumstance, legal or safety reasons may require us to pass on personal information.

### **How you can access or correct your personal information or make a complaint:**

If you would like to contact us with regards to the personal information we hold about you, our contact details are:

The Privacy Officer  
McCloud Consulting Group  
Suite 13,  
23 Narabang Way  
Belrose, NSW 2085

Telephone: +61 2 9975 2270  
email: [info@McCloudCG.com](mailto:info@McCloudCG.com)

We will respond to your request for access to personal information we hold about you as soon as we reasonably can, including if we are unable to provide you with access (such as when we no longer hold the information).

We do not impose any charge for a request for access, but we may charge you a reasonable fee for our costs associated with providing you with access and retrieval costs.

If you wish to complain about a breach of the privacy rules that bind us, you may contact our Privacy Officer at one of the above contact points. We may ask you to put your complaint in writing and to provide details about it. We will establish in consultation with you a reasonable process, including time frames, for seeking to resolve your complaint. If our Privacy Officer cannot resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, our Privacy Officer will inform you that your complaint may be referred to the Privacy Commissioner for further investigation and will provide you with the Commissioner's contact details.

6<sup>th</sup> April 2018.