

# Privacy Policy

Updated January 08, 2026

## Purpose

This Privacy Policy (“Policy”) explains how Signant Health, Inc. and its subsidiaries and affiliates, including Bracket Global LLC Inc., Motentia, LLC, CRF Health Management Limited, and VirTrial, LLC (“Signant Health,” “we,” “us,” or “our”) collect, use, and disclose information about you when you interact with each website, application, or other digital platform that links to or references this Policy (the “Site”), or interact with any of the services that we make available through the Site (collectively, the “Services”).

**Supplemental Privacy Notice for U.S. Residents:** If you are a resident of certain states in the United States, including California, Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia, this Policy also incorporates our [Supplemental Privacy Notice for US Residents](#), which includes additional information required to be provided under applicable state laws.

By accessing our Site or using any of our Services, you acknowledge that your information will be handled as described in this Privacy Policy.

This notice may occasionally be updated. When material updates are made, the date of the last revision will be reflected at the top of the page.

## Information collected

Below is a high-level summary of the types of Personal Data we may collect from you depending on the context of your interaction with us. Following that high-level summary is additional detail and information on how we may collect, process and use your Personal Data.

	Identity and contact information	Other personal data	Visual and audio information	Technical information	Health information	Commercial information	Professional and educational information	Anonymized and/or de-identified data
Clinical trial participants and candidates	X	X	X	X	X			X
Visitors to our websites and locations, senders of inquiries	X		X	X				X
Health care professionals	X	X	X	X			X	X
Employees, contractors and candidates	X	X	X	X	X	X	X	X
Customers (sponsors, CROs)	X	X		X				X
Vendors	X			X		X	X	X
Attendees at events	X		X				X	X

Signant Health does not knowingly collect, maintain, disclose, or otherwise process Personal Data from minors below the age of 16.

- [Clinical trial participants and candidates](#)
- [Visitors to Our Corporate Websites and Physical Locations, and Senders of Inquiries](#)

- [Health Care Professionals](#)
- [Employees, contractors and candidates](#)
- [Customers \(sponsors and CROs\)](#)
- [Vendors](#)
- [Attendees at events](#)

### **Clinical trial participants and candidates**

We may process your Personal Data when you participate or intend to participate in a clinical trial or you are a caregiver of a patient who participates in a clinical trial that is sponsored by one of our customers. Signant Health provides software and various other services to clinical trial sponsors and CROs (Contract Research Organizations). Under such circumstances, Signant Health is the data processor, and the clinical trial sponsor is the data controller.

**The data controller (clinical trial sponsor) may provide you with additional data privacy information. If you participate in a clinical trial, you will receive a separate privacy notice (Informed Consent Form) from the data controller (clinical trial sponsor), which describes how your Personal Data is processed in the clinical trial.**

#### **Examples of the types of data we process:**

**The types of personal data that Signant Health process about clinical trial participants and caregivers in a specific study are described in the separate privacy notice that the clinical trial sponsor provides to the patients (Informed Consent Form).**

In general, depending on the services Signant Health provides to the data controller, and subject always to applicable laws and the requirements of a specific study, Signant Health may process the following types of data:

#### **Identity and contact information, such as:**

- first and last name
- patient ID
- email address
- postal address
- phone number
- signature

#### **Other personal information, such as:**

- age
- gender
- initials
- date of birth
- username

- password

**Visual and audio information, such as:**

- still images
- video or audio recordings

**Technical Information, such as:**

- Internet Protocol (IP) address
- browser type and browser language
- device type and/or device ID, if the device is provided by Signant Health
- location data to enable Bluetooth connection to study devices (only for TrialMax)
- activity on our website or applications
- data collected from cookies or other similar technologies

**Health information**

- diseases
- study visit dates
- medical history and treatment information
- responses to questionnaires/e-diaries

**Anonymized / de-identified data**

- Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws

**Where do we get the data?**

We may get your Personal Data (1) directly from you; (2) from the devices you use; (3) from your caregiver; (4) from health care professionals.

**Why do we process the data?**

- To send you your login credentials
- To provide the software/services to you and to our customers
- To send you reminder messages
- To determine your eligibility to participate in the clinical trial
- To identify and authenticate you
- To detect security incidents
- To protect against malicious or illegal activity
- To ensure the appropriate use of our software

- To improve our software and services
- For short-term, transient use
- For administrative purposes
- For quality assurance

**Signant Health's role in the data processing:**

Signant Health processes the Personal Data on behalf of the study sponsor as a data processor. The study sponsor is the data controller of the Personal Data.

**The legal basis of processing:**

As determined by the data controller.

**Who receives the data?**

- Signant Health, our affiliates, subsidiaries, and related companies
- Our customers (the data controller who sponsors the clinical trial)
- Health care professionals (members of the study team)
- Vendors that assist us in providing our Services

The device manufacturers or OS providers have no access to Personal Data

**Visitors to our corporate websites and physical locations, and senders of inquiries**

We may process your Personal Data when you (1) visit our websites or our physical locations; (2) submit inquiries to us online or offline; (3) sign up for our newsletters or other informational or marketing materials.

**Examples of the types of data we process:**

- **Identity and contact information, such as:**
  - first and last name, email address, postal address, phone number
- **Visual and audio information, such as:**
  - still images, video (including via CCTV) , recordings of your calls
- **Technical Information, such as:**
  - Internet Protocol (IP) address, browser type and browser language, device type, Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our website , activity on our website and referring websites or applications, data collected from cookies or other similar technologies
- **Anonymized / de-identified data**
  - Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws.

**Where do we get the data?**

We may get the Personal Data (1) directly from you; (2) from the devices you use; (3) our security systems (CCTV); (4) third parties.

**Why do we process the data?**

- To provide you with access to our website and to our services
- To communicate with you
- To send you updates
- To customize content for you
- To detect security incidents
- To protect against malicious or illegal activity
- To ensure the appropriate use of our website
- To improve our services
- For short-term, transient use
- For administrative purposes
- For marketing, internal research, and development
- For quality assurance

**Signant Health's role in the data processing:**

Signant Health is the entity responsible for the collection and use of your Personal Data (known in some jurisdictions as the “data controller”)

**The legal basis of processing:**

- For the purposes of our legitimate interests
- In circumstances where we have requested and received consent
- For other purposes that may be required or allowed by law

**Who receives the data?**

- Signant Health, our affiliates, subsidiaries, and related companies
- Vendors that assist us in providing our services or help us improve our marketing or administration.

**Health care professionals**

We may process your Personal Data if you work at a research site and participate in a clinical trial that is or has been sponsored by one of our customers.

## **Examples of the types of data we process:**

Depending on the services Signant Health provides to its customers, Signant Health may process the following types of data:

- **Identity and contact information, such as:**
  - first and last name, email address, postal address, phone number
- **Other personal information, such as:**
  - username, password
- **Visual and audio information, such as:**
  - video or audio recordings
- **Technical Information, such as:**
  - Internet Protocol (IP) address, browser type and browser language, device type and/or device ID, if the device is provided by Signant Health, activity on our website or applications, data collected from cookies or other similar technologies
- **Professional and educational information**
  - job title or position, employer, medical license number, work skills, employment history, degrees and certifications, clinical trial experience, specialized trainings and training records, performance metrics
- **Anonymized / de-identified data**
  - Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws

## **Where do we get the data?**

We may get the Personal Data (1) directly from you; (2) from the devices you use; (3) from our customers; (4) data may be generated based on your interaction with Signant Health.

## **Why do we process the data?**

- To send you your login credentials
- To provide the software/services to you and to our customers
- To send you reminder messages
- To communicate with you
- To provide you training
- To identify and authenticate you
- To detect security incidents
- To protect against malicious or illegal activity

- To ensure the appropriate use of our software
- To improve our software and services
- For short-term, transient use
- For administrative purposes
- For quality assurance
- For marketing, internal research and product development
- To assess your eligibility to participate in clinical trials
- To recommend you to clinical trial sponsors

**Signant Health's role in the data processing:**

When Signant Health provides services to a sponsor of a clinical trial or Contract Research Organization (CRO), Signant Health processes the Personal Data on behalf of the study sponsor as a data processor. The study sponsor is the data controller of the Personal Data.

**Signant Health processes the Personal Data as a data controller for the following purposes:**

- for marketing, internal research and product development
- to assess your eligibility to participate in clinical trials
- to recommend you to clinical trial sponsors
- for administrative purposes
- for quality assurance

**The legal basis of processing:**

- As determined by the data controller
- For the purposes of our legitimate interests
- For other purposes that may be required or allowed by law
- Your consent that you provided to the study sponsor/CRO or directly to Signant Health

**Who receives the data?**

- Signant Health, our affiliates, subsidiaries, and related companies
- Our customers
- If you agree, your data may be shared with our other customers
- Vendors that assist us in providing our services
- The device manufacturers or OS providers have no access to Personal Data.

**Employees, contractors or candidates**

We may process your Personal Data if you apply for a position at Signant Health or if you are an employee or a contractor at Signant Health. If you are a candidate, please visit our Recruitment Privacy Policy for further information on how we process your Personal Data. If you are an employee or a contractor, please visit the separate privacy notice that was provided to you for further information on how we process your Personal Data.

**Examples of the types of data we process:**

- **Identity and contact information, such as:**
  - first and last name
  - email address
  - postal address
  - phone number
- **Other personal information, such as:**
  - age
  - gender
  - date of birth
  - marital status, dependents
- **Visual and audio information, such as:**
  - still images
  - video (including via CCTV)
  - recordings of your calls
- **Technical Information, such as:**
  - Internet Protocol (IP) address
  - browser type and browser language
  - device type and/or device ID, if the device is provided by Signant Health
  - activity on our website or applications
  - data collected from cookies or other similar technologies
  - geolocation
- **Health information**
  - disability
  - maternity, parental leave
  - sick leave
- **Commercial and financial information**

- bank account information
- tax information
- salary
- **Professional and educational information**
  - job title or position
  - employer
  - work skills
  - employment history
  - degrees and certifications
  - training records
  - performance metrics
- **Anonymized / de-identified data**
  - Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws

### **Where do we get the data?**

We may get the Personal Data (1) directly from you; (2) from the devices you use; (3) from third parties (e.g. background checks); (4) data may be generated based on your interaction with Signant Health.

### **Why do we process the data?**

- to communicate with you
- to provide you training
- to identify and authenticate you
- to detect security incidents
- to protect against malicious or illegal activity
- to ensure the appropriate use and operation of our software and services
- to improve our software and services
- for short-term, transient use
- for administrative purposes
- for quality assurance
- for marketing, internal research and product development
- to assess your eligibility for a position

- to evaluate your performance
- to perform other employment related tasks

### **Signant Health's role in the data processing:**

Signant Health is the entity responsible for the collection and use of your Personal Data (known in some jurisdictions as the “data controller”).

### **The legal basis of processing:**

- for the purposes of our legitimate interests
- for other purposes that may be required or allowed by law
- to comply with legal obligations
- in preparation for or to perform a contract
- your consent that you provided to Signant Health

### **Who receives the data?**

- Signant Health, our affiliates, subsidiaries, and related companies
- our customers
- vendors that assist us in providing our Services
- public and governmental authorities, to the extent required by law

### **Customers (sponsors and CROs)**

We may process your Personal Data if work at one of our customers (sponsors and CROs) and interact with Signant Health and/or access our software.

### **Examples of the types of data we process:**

- Identity and contact information, such as:
  - first and last name
  - email address
  - postal address
  - phone number
- Other personal information, such as:
  - username
  - password
  - job title
  - employer
- Technical Information, such as:
  - Internet Protocol (IP) address

- browser type and browser language
- device type and/or device ID, if the device is provided by Signant Health
- activity on our website or applications
- data collected from cookies or other similar technologies
- Anonymized / de-identified data
  - Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws

### **Where do we get the data?**

We may get the Personal Data (1) directly from you; (2) from the devices you use; (3) from your employer.

### **Why do we process the data?**

- to send you your login credentials
- to provide the software/services to you or to your employer
- to communicate with you
- to identify and authenticate you
- to detect security incidents
- to protect against malicious or illegal activity
- to ensure the appropriate use of our software
- to improve our software and services
- for short-term, transient use
- for administrative purposes
- for quality assurance
- for marketing, internal research and product development

### **Signant Health's role in the data processing:**

- When Signant Health provides services to a sponsor of a clinical trial or Contract Research Organization (CRO), Signant Health processes the Personal Data on behalf of the study sponsor as a data processor. The study sponsor is the data controller of the Personal Data.
- Signant Health processes the Personal Data as a data controller for the following purposes:
  - for marketing, internal research and product development
  - for administrative purposes

- for quality assurance

#### **The legal basis of processing:**

- as determined by the data controller
- for the purposes of our legitimate interests
- for other purposes that may be required or allowed by law
- to comply with a legal requirement
- in preparation for or to perform a contract
- your consent

#### **Who receives the data?**

- Signant Health, our affiliates, subsidiaries, and related companies
- vendors that assist us in providing our Services
- The device manufacturers or OS providers have no access to Personal Data.

#### **Vendors**

We may process your Personal Data if you provide any services to Signant Health.

#### **Examples of the types of data we process:**

Depending on the services you provide to Signant Health, Signant Health may process the following types of data:

- Identity and contact information, such as:
  - first and last name
  - email address
  - postal address
  - phone number
- Technical Information, such as:
  - Internet Protocol (IP) address
  - browser type and browser language
  - device type and/or device ID, if the device is provided by Signant Health
  - activity on our website or applications
  - data collected from cookies or other similar technologies
- Commercial information
  - bank account information
  - tax information, including tax number
- Professional and educational information

- job title or position
- employer
- work skills
- degrees and certifications
- specialized trainings and training records
- performance metrics
- Anonymized / de-identified data
  - Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws

### **Where do we get the data?**

We may get the Personal Data (1) directly from you; (2) from the devices you use; (3) from third parties; (4) data may be generated based on your interaction with Signant Health.

### **Why do we process the data?**

- to provide the software/services to our customers
- to communicate with you
- to provide you training
- to identify and authenticate you
- to detect security incidents
- to protect against malicious or illegal activity
- to ensure the appropriate use of our software
- to improve our software and services
- for short-term, transient use
- for administrative purposes
- for quality assurance
- for marketing, internal research and product development
- for vendor assessment and qualification

### **Signant Health's role in the data processing:**

Signant Health is the entity responsible for the collection and use of your Personal Data (known in some jurisdictions as the “data controller”).

### **The legal basis of processing:**

- for the purposes of our legitimate interests

- for other purposes that may be required or allowed by law
- your consent
- to comply with a legal requirement
- in preparation for or to perform a contract

### **Who receives the data?**

- Signant Health, our affiliates, subsidiaries, and related companies
- our customers
- other vendors that assist us in providing our Services

### **Attendees at events**

We may process your Personal Data if you attend professional events we sponsor or hold.

### **Examples of the types of data we process:**

- **Identity and contact information, such as:**
  - first and last name
  - email address
  - postal address
  - phone number
- **Visual or audio information, such as:**
  - still images
  - video (CCTV)
- **Professional and educational information:**
  - job title
  - employer
  - employment history
  - certifications and education
  - responses to questionnaires
- **Anonymized / de-identified data**
  - Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws

### **Where do we get the data?**

We may get the Personal Data (1) directly from you; (2) from our business partners; (3) from your employer.

**Why do we process the data?**

- to communicate with you
- to identify and authenticate you
- to detect security incidents
- to protect against malicious or illegal activity
- to improve our software and services
- for short-term, transient use
- for administrative purposes
- for quality assurance
- for marketing, internal research and product development

**Signant Health's role in the data processing:**

Signant Health is the entity responsible for the collection and use of your Personal Data (known in some jurisdictions as the “data controller”).

**The legal basis of processing:**

- for the purposes of our legitimate interests
- for other purposes that may be required or allowed by law
- in preparation for or to perform a contract
- to comply with a legal requirement
- your consent

**Who receives the data?**

- Signant Health, our affiliates, subsidiaries, and related companies
- Other event attendees
- vendors that assist us in providing our Services

**How We Share Personal Data**

In addition to the third parties described under each category in the above section, we may share Personal Data with the following categories of third parties to accomplish the purposes set out above and for the additional purposes set forth below.

- To Protect Our Legal Rights or Comply with Legal Requirements. We may disclose Personal Data as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
- Sale or Transfer of Corporate Assets. In the event of a merger, sale, joint venture or other transaction involving a transfer of our business or assets, we may transfer your information to other parties involved in the transaction. Any entity acquiring our data assets will do so with the express, written commitment to use the data only for authorized purposes, and to maintain a similar level of privacy and information security protection. You will be notified via email or notice on our website of any change in

ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

- **With Your Consent.** We may disclose your personal information to other third parties for any lawful purpose with notice to you or your consent.

## **Individual Rights**

You may have a right under your jurisdiction's data protection law to the following rights with respect to some or all of your Personal Data:

- To request access to your Personal Data (including under GDPR Article 15);
- To request that we rectify or erase your Personal Data (including under GDPR Articles 16 and 17);
- To request that we restrict or block the processing of your Personal Data (including under GDPR Articles 18, 21 and 22 and to object to the sale or sharing of your Personal Data under other relevant laws);
- To provide your Personal Data directly to another organization, i.e., a right to data portability (including under GDPR Article 20);
- When we previously obtained your consent, to withdraw consent to processing (including under GDPR Article 21); and
- To lodge a complaint with the data protection authority in your area.

We will make reasonable efforts to respond promptly to your requests in accordance with applicable laws. We may, after receiving your request, require additional information from you to honor the request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

When we receive your Personal Data from our customers and process your Personal Data on their behalf, we do so in the capacity of a data processor. In such cases Signant Health may need to contact the data controller and follow the data controller's instructions.

To exercise these rights, please use Signant Health's contact page <https://signanthealth.com/company/contact-us>, direct email to [dpo@signanthealth.com](mailto:dpo@signanthealth.com), or contact a Signant Health HR representative, as the case may be. If you are a resident of India, you may also reach out to the Grievance Officer, Agnes Foldi, at [dpo@signanthealth.com](mailto:dpo@signanthealth.com).

## **Data Security**

Signant Health has internal policies and controls in place designed to protect Personal Data against loss, accidental destruction, misuse or disclosure, and unauthorized access. However, as is the case with all websites, applications, products, and services, we unfortunately are not able to guarantee security for data collected through our products and services. In addition, it is your responsibility to safeguard any passwords, PIN codes, or similar individual information associated with your use of our products and services.

## International Data Transfers

Your Personal Data may be transferred and maintained outside your state, province, country, or other jurisdiction where the privacy laws may not be as protective as those in your location, including the United States. We have put in place lawful transfer mechanisms and adequate safeguards, in accordance with applicable legal requirements, to protect your Personal Data.

## How long your personal data will be retained

We generally retain Personal Data for as long as needed for the specific business purpose or purposes for which it was collected. In some cases, we may be required to retain Personal Data for a longer period of time by law or for other necessary business purposes. Whenever possible, we aim to anonymize the information or remove unnecessary identifiers from records that we may need to keep for periods beyond the specified retention period.

When we act as a data processor, the retention period is determined by the data controller.

## Cookies and similar technologies

Signant Health and its third party partners uses cookies, pixels, and similar technologies to automatically collect information about you and your use of our websites. We use these technologies to better understand and improve your experience on our websites and for advertising purposes. We may combine the information we collect through cookies and similar technologies with other information we collect about you, and our third party partners may do so on our or their own behalf.

- **Cookies.** Cookies are small data files that are served by our platform and stored on your browser or device. Each cookie contains a unique identifier that allows the domain that set the cookie to recognize your browser and remember specific information about your visit, such as preferences or actions taken during a session. Our site uses cookies dropped by us or third parties for a variety of purposes. Certain cookies are necessary for the website to operate properly, others allow us to analyze usage patterns, measure performance, improve the functionality of our website, and personalize the website to improve users' experience and for targeted advertising purposes. Cookies may expire at the end of your browsing session, or they may be stored on your browser ready for the next time you visit the website. You can prevent the setting of cookies by adjusting the settings on your browser (see your browser "Help" section for how to do this). Please note that certain features of our website may not function as intended if you disable or delete cookies.
- **Pixels and similar technologies.** Pixels (also known as clear GIFs, web beacons, or tags) are small pieces of code embedded in web pages or emails that perform functions similar to cookies. Unlike cookies, which are stored on a user's browser or device, pixels load when a webpage is visited or an email is opened. We and our third party partners may use pixels on the website to understand how users navigate the website, measure engagement with website content and email communications, compile aggregate statistics about website usage, and improve the performance and effectiveness of the website. Pixels may collect information such as the IP address of the device used to access the website, browser type, operating system, device identifiers, the URL of the page visited, the time and duration of the visit, approximate

geographic location derived from IP address, the identification number of any cookie previously set by the same server, browsing and clickstream data, search or navigation history within the website, and information entered into web forms on the website, as well as information about interactions with our emails, including whether an email was opened, any links were clicked, or the email forwarded.

- **Session replay technologies.** We may use session replay technologies to monitor and record your interactions with our website for purposes described in this Privacy Policy, including to diagnose errors and to otherwise improve our website.
- **Analytics.** We may use third party analytics tools, such as Google Analytics, that collect information through cookies and pixels to help us better understand how users interact with our website, measure performance, and improve website content and functionality. [You can learn about how Google Analytics uses data and how to opt out of Google Analytics.](#)
- **Advertising.** In certain instances, we may set cookies and similar technologies provided by third-party partners to collect information regarding your activities on our website (for example, your IP address, location, page(s) visited, time of day, and videos you watch) for advertising purposes. We may also share information with our third-party advertising partners so that we and they can tailor advertisements to you on and off our website. These advertising partners may use this information (and similar information collected from other websites or applications) for purposes of delivering targeted advertisements, special offers, and promotional materials to you when you visit unaffiliated websites or applications within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising.” You may be able to opt-out of interest-based advertising from third-party advertising partners that participate in certain industry groups by visiting: [Digital Advertising Alliance](#) or [Network Advertising Initiative](#) .

## Contact us

If you have questions or comments about this Notice or about how your Personal Data is processed, please contact us by using Signant Health’s contact page <https://signanhealth.com/company/contact-us> or email to Signant Health’s Data Protection Officer at [dpo@signanhealth.com](mailto:dpo@signanhealth.com).