NOVELUTION PRIVACY POLICY

Our client's privacy is very important to us. Accordingly, this Policy explains how we collect, use, communicate, disclose and make use of personal and other sensitive information. Novelution will collect and use such information solely with the objective of fulfilling the purposes of providing an ERA platform to our clients according to the functional specifications agreed upon together. Generally, this involves our software receiving data via integration with our clients' external database systems, such as Human Resources databases, to synchronize data, as well as via user submitted data in our web forms to enhance the functionality associated with our user and institutional profiles, and other related data records specified in our ERA system (e.g. sponsored research and protocol records). Novelution will customize rules governing privacy-based access to privileged information (e.g. user account profile data that may need to be shared with other users involved in common projects in the system) according to any institutional policy decisions specified by our clients during the discovery phase.

All data retained by an installation of our system for a particular client institution is owned by the client. The Novelution platform will retain such data according to archiving policies agreed upon with the client. We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. We will make readily available to customers information about our policies and practices relating to the management of personal information. We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

Personally identifiable information is stored in our system's user profiles, according to the functional requirements of the ERA system specified by our client. Additionally, user activity on the site (logins, internal system-based communication with other users, requests to edit sponsored research and protocol records, etc.) is stored in our system. Storage of such information is NOT for Novelution's purposes, aside from that of providing functionality to our clients to support their ERA needs. The only data extracted from the system that Novelution would ever use for its own purposes, would be non-personal, non-identifiable (to individual or institution), aggregate data regarding the effectiveness of the system (e.g. average timeframes for protocol records to go through stages of routing within the system, success rates of S2S submissions, etc.).

The Novelution software system automatically collects user submitted information and information tracking user activity in our application, as described above. This information is only collected for the purposes of enhancing the user experience and functionality of our applications, and to support the functional requirements of the ERA system for our client. All data is owned by the client. Some information is collected by client-side JavaScript code and secure browser cookies are used to manage session id values sent to the application server which maintains some data in session memory of the application server and some data in our database servers, AWS S3 buckets, and application server logs. Client-side data and server session state data is transient. Backups and logs are retained according to configurable policies to be agreed with our client. And application data in our database is generally stored indefinitely, but can be deleted according to client-defined archiving and deletion policies. The information is secured via multiple layers (e.g. firewall, layers of encryption, role-based access within software, etc.).

Novelution does NOT share information with third parties, unless requested by our clients who own their own data.