

NOTICE OF DATA PROCESSING

This notice describes how the Icahn School of Medicine at Mount Sinai (“we” or “Mount Sinai”) collects, uses, shares, and otherwise processes personal information about you (“personal data”) if you are a participant in research conducted by or involving researchers at Mount Sinai. Such personal data may be subject to Regulation (EU) 2016/679 (“GDPR”) or the United Kingdom General Data Protection Regulation, as implemented by the Data Protection Act 2018 of the UK (“UK GDPR”).

The general information in this Notice supplements any specific information that you have already received (*e.g.*, in a consent form) in connection with your participation in a relevant research study or project conducted by or involving researchers at Mount Sinai. In the event that there is a contradiction between this Notice and specific information that you have already received in connection with the research study or project (*e.g.*, in a consent form), the specific information takes precedence.

Processing of Personal Data

If you have agreed to participate in a research project or study, we may process your personal data, certain categories of which may be considered “sensitive data” under the GDPR or UK GDPR. The types of personal data we process may include, as applicable:

- Demographic information (*e.g.* information regarding age, employment, education);
- Health data;
- Genetic data;
- Biometric data;
- Survey data (*e.g.*, responses you provide as part of a study);
- Information about your racial or ethnic origin;
- Information about your political opinions, religious or philosophical beliefs, or trade union membership; and/or
- Information about your sex life or sexual orientation

We process your personal data to conduct the research for the relevant study or project. We may also process your personal data to comply with legal obligations, including to respond to subpoenas, court orders, regulatory authority requests, or other legal processes.

The lawful bases for the collection and other processing of personal data by Mount Sinai may be the following, as applicable:

- your consent;
- when necessary for the purposes of the legitimate interests, such as conducting research;
- when necessary for scientific or historical research purposes, as performed consistently with required data protection safeguards;
- when necessary to perform tasks that are in the public interest (*e.g.*, research in fields of academic study); and/or

- when necessary to comply with a legal obligation (e.g., required reporting of information to regulatory authorities).

We may share your personal data only as necessary with the following individuals or entities, as applicable:

- Members of the Mount Sinai research team conducting the research study or project;
- Authorized research teams for sponsors of or collaborators in the research study or project, including their agents;
- Vendors engaged to provide services in connection with the research study or project (e.g., IT vendors; cloud service providers); and/or
- Representatives of regulatory authorities that may request or demand data pursuant to a legal requirement.

Transfer of Personal Data Outside the European Economic Area (“EEA”) and United Kingdom (“UK”)

Mount Sinai is located in the United States. The data protection laws in the United States, where your personal data may be processed, may not offer you the same protections as in your country of residence. We comply with applicable U.S. laws protecting individuals’ privacy and employ reasonable technical and organizational safeguards in order to protect the privacy and security of your personal data. We may also transfer your personal data to third parties, including our vendors, that may be located outside of the EEA or UK, as permitted by applicable law.

Retention of Data

We retain personal data as long as necessary for the purposes it was collected and processed, including to fulfill the objectives of the research or to ensure the integrity of the research. We may also retain certain personal data for longer periods if required by law or to protect our legal rights.

Individual Rights

You may have the following legal rights under applicable law with respect to the personal data processed by Mount Sinai:

- To access the personal data that we have about you
- To request that we rectify or erase your personal data
- To request that we restrict the way we use your personal data
- To object to the way we use your personal data
- To ask us to transfer your personal data to someone else
- To lodge a complaint with a data protection authority in the EEA (https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)
- To withdraw consent to the processing of your personal data

Our ability or obligation to comply with your requests may be limited by applicable law, the nature of the research study or project, and/or our internal policies, procedures, and operations.

Contact Information

The controller or processor of the personal data described in this notice is:

Icahn School of Medicine at Mount Sinai
1 Gustave L. Levy Place
New York, NY 10029-5674

If you have questions about the processing of your personal data, or would like to request to exercise one of your rights as a data subject, please contact us at Compliance.info@mountsinai.org.

Changes to the Policy

We may revise this Notice from time to time. The date below will show when this Notice was last revised. Revisions to this Notice are effective from the date on which they are posted.

Last revised: November 26, 2024