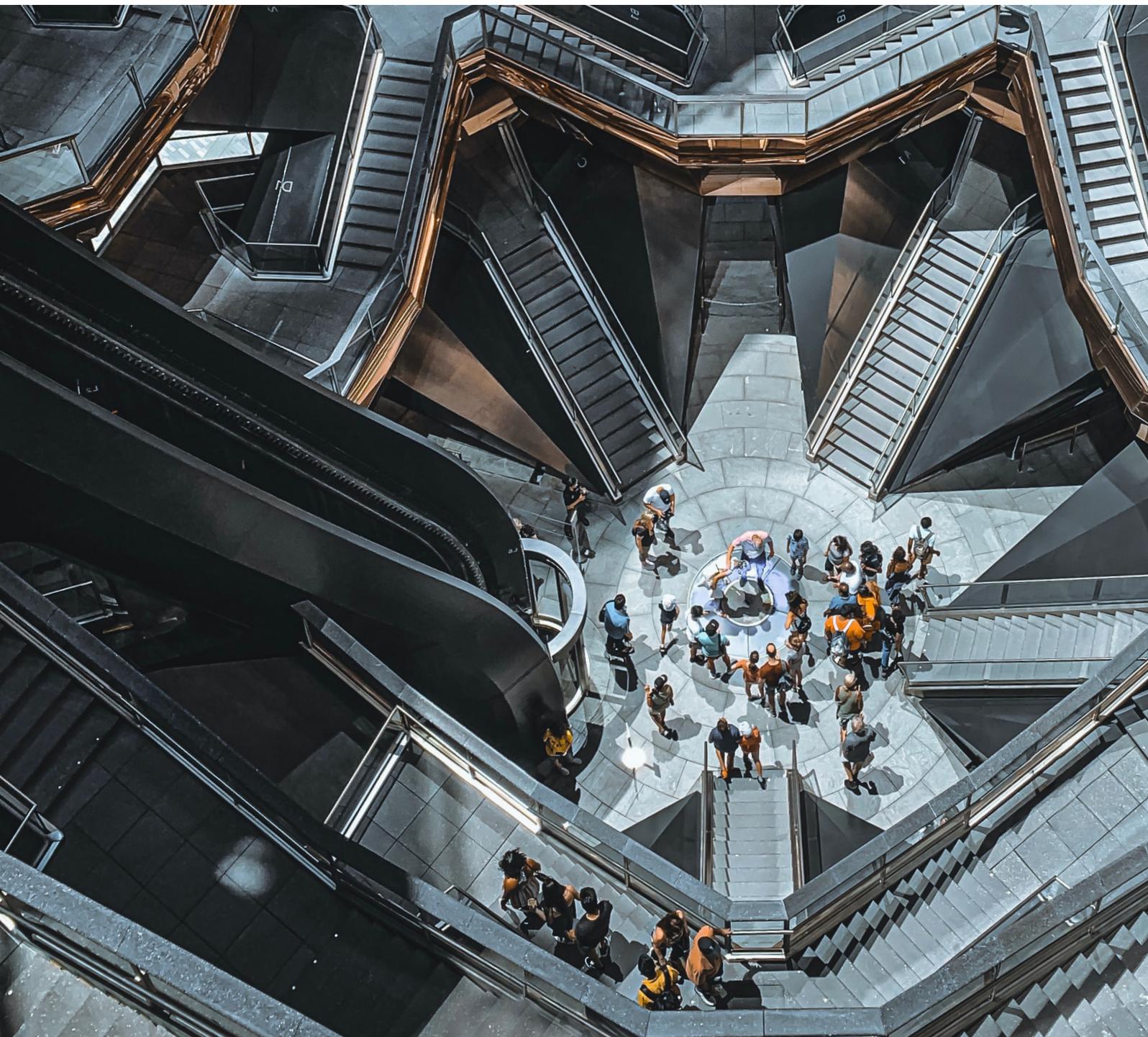




Clarivate

Privacy program overview



Clarivate is committed to ensuring the protection of the personal data that we process, and providing a compliant and consistent approach to data protection. We have a robust and effective data protection program in place based on a strong foundation of internationally accepted privacy principles.

Key aspects of our privacy program

Policies and procedures

We have established a number of data protection policies and procedures to meet the requirements and standards of relevant data protection laws, including:



Data protection

Our accountability and governance measures ensure that we understand and adequately disseminate and evidence our obligations and responsibilities, with a dedicated focus on privacy by design and the rights of individuals.



Data retention and erasure

Our retention policy and schedule ensure that we meet the 'data minimization' and 'storage limitation' principles and that personal data is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new 'Right to Erasure' obligation and are aware of when this and other data subject's rights apply; along with any exemptions, response timeframes and notification responsibilities.



Personal data breaches

Our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.



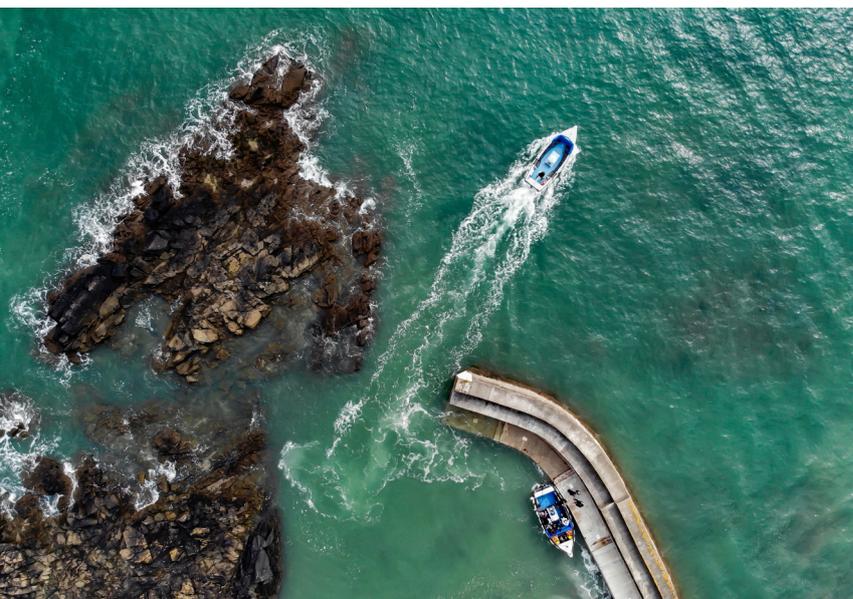
International data transfers and third-party disclosures

Where Clarivate stores or transfers personal data outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data.



Data subject request (DSR)

We have DSR procedures to verify the identity of data subjects and to process requests within applicable timeframes and subject to any applicable exemptions. We have a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.



Training and awareness

We have implemented an employee training program which is provided to all employees upon hire and annually thereafter. Ongoing privacy awareness communications and activities are conducted periodically, and specialized training sessions are provided for specific roles or departments as appropriate.

Recordkeeping

We maintain records of our processing activities, ensuring that our obligations under applicable laws, including Article 30 of the GDPR, are met.

Privacy notices

We have implemented privacy notices to ensure that individuals whose personal data we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.

Consent

We have mechanisms for obtaining and recording consent, making sure that we can evidence an affirmative opt-in and an easy way to withdraw consent at any time.

Data protection impact assessments (DPIA)

We have developed procedures and templates for carrying out privacy impact assessments that comply with the GDPR's Article 35 requirements. We have processes in place to assess risk when we process personal data that is considered high risk, involves large scale processing, includes special category data or data relating to criminal convictions and offences.

Processor agreements

Where we use any third party to process personal data on our behalf (for example, cloud hosting, research services, etc.), we have drafted compliant processor agreements and due diligence procedures for ensuring that they (as well as we) meet and understand their/our data protection obligations.



Information security and technical and organizational measures

Clarivate takes the privacy and security of personal data very seriously and has implemented administrative, physical and technical safeguards to protect and secure the personal data that we process.

We have robust information security policies and standards in place to protect personal data from unauthorized access, alteration, disclosure or destruction and have several layers of security measures.

Data Privacy Team

Clarivate has a full-time, dedicated data privacy team to oversee our privacy program and ensure its continued success.

If you have any questions about our privacy program, please contact us at:

data.privacy@clarivate.com

[clarivate/privacy-center.com](https://clarivate.com/privacy-center.com)

clarivate.com