

《Viedoc 隐私政策》

第 4 版，生效日期：2025 年 1 月 13 日。

与前一版本相比的变更

本政策前一版本的生效日期为 2020 年 10 月 8 日。与前一版本相比，我们进行了修改，以明确我们收集和使用与您的帐户相关的数据的目的。

关于本政策

这款基于 web 的平台称为 **Viedoc**，由上海唯到信息科技有限公司（“我们”或“我们的”）提供。我们作为数据控制者，制定本隐私政策的目的在于告知您（“您”或“您的”）我们为何收集以及如何处理您的个人资料（即您的帐户信息和您的使用数据）。

作为您参与的研究活动的一部分，本政策不保护您可能会在此平台上为其他数据主体提交和处理的任何最终个人资料。涵盖这些数据的政策被定义为研究及其数据控制者的一部分。关于这些事项，请咨询您的研究联系人。

登录后，您可以从 Viedoc 页脚中下载本政策的 PDF 可打印版本，以供参考。

同意处理您的个人资料

勾选 Viedoc 中指定的复选框，即表明您接受本《隐私政策》，并向我们提供信息，表示您理解并明确同意以下内容：

- 我们可能会出于本隐私政策中指定的目的处理您的个人资料（请参见 *我们收集哪些信息以及我们如何使用这些信息* 部分）。
- 我们可能会按照本隐私政策的规定处理您的个人数据，包括与其他处理者共享（请参见 *个人资料的共享、披露和转让* 部分）。

我们收集哪些信息以及我们如何使用这些信息

您的帐户信息

作为 Viedoc 帐户持有人，您需要提供您的姓名、联系方式、首选语言和一些账户安全相关信息。我们收集和使用这些数据的目的是如下：

- 将其纳入您选择参与的研究的稽查轨迹中；

- 将其纳入您选择参与的研究的研究数据集中；
- 将其显示在您选择参与的研究的管理界面中；
- 就您注册或使用 Viedoc 与您联系；
- 审核和验证您的帐户信息；
- 就您的询问、意见和建议与您联系；
- 为了您自愿从事的特定目的；
- 请求您参加简单的调查；
- 通知您有关我们提供的产品和服务的更新或信息；
- 生成汇总统计信息；
- 培训和培训认证管理；
- 根据适用法律法规要求，或依据管理机构要求。

您的使用数据

当您使用 Viedoc 时，Viedoc 会自动跟踪有关您的网络来源和浏览行为的某些信息（“使用数据”）。收集的信息包括时间戳、浏览器足迹、IP 地址和用于访问 Viedoc 中每个资源的 URL，以及提供 Viedoc 链接的 URL（如有）。我们收集和使用这些数据的目的如下：

- 将其显示在您选择参与的研究的管理界面中；
- 衡量 Viedoc 的性能；
- 改进 Viedoc 的设计和功能；
- 调查问题；
- 防止和调查可能存在的 Viedoc 欺诈或滥用；
- 根据法律法规要求，或依据管理机构要求。

个人资料的共享、披露和转让

研究参与

通常情况下，您使用 Viedoc 平台的目的是使您能够参与一项或多项临床研究。这要求我们在这些研究中共享您的个人资料。这表示我们将共享您提供给我们的人资料的副本，并且该副本将受研究的隐私政策的保护。

从 2018 年 5 月 27 日发布的 Viedoc 4.42 版本开始，此类信息共享必须获得您的明确批准。登录时，系统将提示您批准或拒绝来自研究管理员的此类请求。（如果您通过 API 登录，将自动批准有关研究的任何待定研究邀请。）

对于您在 Viedoc 4.42 版本之前参与的研究，此类信息共享已获得默示批准，无需您的明确批准。但是，您也可以明确撤销这些批准（请参见 *数据保留*）。

位置

我们可能会在中华人民共和国境内处理您的个人资料。

请注意，作为在研究中共享您的信息的一部分，我们可能会在受这些研究隐私政策的保护的其
他位置处理您的信息。

另请注意，无论您选择从哪个位置使用 Viedoc，当您访问披露您个人数据的 Viedoc 部分时，
从严格意义上，您都会将您的个人资料转移到该位置（临时转移）。如果您正在处理其他资料
主体的个人资料，作为您参与的研究的一部分，必须考虑这一点。我们建议您咨询这些研究的
隐私政策，确保您没有违反这些政策。

合作伙伴

为了交付 Viedoc 服务，我们使用由 21Vianet (Azure China 21Vianet)运营的 Microsoft Azure
提供的服务。该服务是由北京世纪互联宽带数据中心有限公司的全资子公司上海蓝云网络科技
有限公司（“世纪互联”）独立运营和交易的位于中国大陆的物理独立云服务实例。这意味着
我们将在第三方基础设施上处理您的个人资料，但资料始终加密并且在我们的控制之下。我们
还使用阿里云（同样位于中国大陆）提供的电子邮件、短信和加密备份存储服务以及宁夏西云
数据科技有限公司（“NWCD”，位于中国大陆）提供的服务进行加密备份存储。

合并或出售

如果我们的绝大部分资产被出售、合并、清算、解散或转让，在 Viedoc 中收集的关于您的账户
信息和/或使用数据可能被出售、让渡或转让给收购我们全部或大部分股权和/或资产的一方，
以允许该方继续经营 Viedoc。

其他披露

我们还可以根据需要访问、披露和保存您的个人资料，以(i)遵守适用法律或响应有效的法律程
序，包括执法部门或其他政府机构的法律程序；(ii)保护我们的客户或帮助防止对任何人造成生
命损失或严重伤害；(iii)操作和维护我们的服务安全性，包括防止或阻止对我们的电脑系统或
网络的攻击；(iv)保护我们的权利或财产，包括执行有关服务使用的管辖条款。

更正个人资料

您可以访问和更正您手动提供的所有个人资料。您可以通过登录 Viedoc 并使用位于右上角的
账户功能来完成更正。如果您的任何联系方式不正确，请通过修改您的个人资料进行更新。除
此之外，您还可以查看我们收集的使用数据的汇总摘要。

数据保留

您可以随时选择删除您的帐户。首先应撤销所有的研究访问；当您的研究访问未经批准或并无等待邀请时，将出现一个帐户删除选项。如果您选择继续使用此选项，您的个人资料将被删除。资料将立即从联机服务中删除。除非法律要求更长的保留期限，或需要调查欺诈或滥用 Viedoc 的行为，否则这些资料将在备份周期内从任何备份中删除。

作为您参与研究的一部分，您可能在研究中共享的信息副本将根据相关研究的隐私政策予以保留。

使用 Cookie 和本地存储

Viedoc 同时使用 Cookie 和本地存储。当您使用 Viedoc 时，我们使用这两种技术在您的计算机上临时存储信息。目的是维护当前使用会话的状态和上下文，即从您进入 Viedoc 的登录页面到注销并关闭浏览器这一过程。我们不会在任何时候使用您的计算机储存任何个人资料，也不会当您停止使用 Viedoc 时留下任何类型的信息。

您的浏览器可能已被设置为接受 Cookie。如果您选择将浏览器设置为拒绝 Cookie，Viedoc 将无法正常工作。

安全

我们非常重视您的个人资料的完整性。因此，我们实施了技术和安全政策和程序，旨在降低意外毁损或丢失的风险，或擅自披露或访问与相关数据性质合理相称的此类信息的风险。

Viedoc 所接收或发送的所有信息均已加密，我们也会加密所有静态数据。

Viedoc 提供一个可选的双因素身份认证功能，您可以随时启用。但是，如果您参与一项需要此功能的研究，您还需要使用此功能。

请注意，您应负责确保您访问 Viedoc 时使用的计算机、平板电脑或电话（或任何其他设备）是安全的，不会泄露信息。

联系数据控制者

如果您对本隐私政策有任何疑问，请致函：

Data Protection Officer

上海唯到信息科技有限公司

上海汉口路 266 号申大厦 12 楼

中国

您还可以发送电子邮件到 dpo@viedoc.com。

变更

请注意，我们可能会更新本《隐私政策》。变更发布后，首次登录 Viedoc 时，将要求您接受本《隐私政策》的任何更新。如果您不希望受任何更新的《隐私政策》的约束，您可以停止使用 Viedoc，并使用本《隐私政策》中的联系方式向我们发送电子邮件，以请求删除您的帐户（确保从帐户上注册的电子邮件地址发送电子邮件），或者先接受更新的《隐私政策》，然后亲自删除您的帐户。

管辖法律

本《隐私政策》的有效性、解释和履行应受中华人民共和国实体法的管辖，而不适用任何法律冲突原则。您同意位于中华人民共和国境内的任何法院对因本《隐私政策》而产生的或与本《隐私政策》有关的任何事项具有专属管辖权，并且审判地点在此类法院。

Viedoc Privacy Policy

Version 4, Effective: Jan 13, 2025.

Changes since previous version

The previous version of this policy had an effective date of Oct 8, 2020. Compared to that version we have made a change to clarify the purpose for which we collect and use the data connected to your account.

About this policy

This web-based platform called **Viedoc** is provided by 上海唯到信息科技有限公司 ("we", "our" or "us"). We, in our capacity as data controller, have created this Privacy Policy to inform you ("you" or "your") about why we collect and how we process your personal data, i.e. your account information and your usage data.

This policy does not cover any eventual personal data that you may submit and process on this platform for other data subjects as part of activities of a study that you participate in. The policies covering such data are defined as part of the study and its data controller. Please ask your study contact for more information regarding these matters.

For your reference, you may download a printable PDF version of this policy located in the footer of Viedoc after login.

Consent to Processing of Your Personal Data

By accepting this Privacy Policy using the designated check-box in Viedoc, and providing information to us, you understand and unambiguously consent to the following:

- We may process your personal data for the purposes specified in this Privacy Policy (see section *我们收集哪些信息以及我们如何使用这些信息*).
- We may process your personal data as described herein including sharing it with other processors, as specified in this Privacy Policy (see section *个人资料的共享、披露和转让*).

What Information We Collect and How We Use That Information

Your Account Information

As a Viedoc account holder we require you to provide your name, contact details, preferred language and some account security related information. We collect and use this data for the following purposes:

- to include it in the audit-trail in the studies you choose to participate in;
- to include it in the study datasets of the studies you choose to participate in;
- to display it in the administrative interface of the studies you choose to participate in;
- to contact you in connection with your registration or use of Viedoc;
- to review and verify your account information;
- to contact you in response to your inquiries, comments and suggestions;
- for specific purposes for which you volunteered;

- to ask for your participation in brief surveys;
- to notify you about updates or information regarding products and services provided by us;
- to generate aggregate statistical information;
- for training and training certification management; and
- as required by applicable law or regulation, or as requested by authorities.

Your Usage Data

Viedoc automatically track certain information about your internet origin and browsing behavior when you use Viedoc (“**Usage Data**”). The information collected includes the timestamp, browser footprint, IP-address and URL used to access each resource in Viedoc, and what URL, if any, that provided the link to Viedoc. We collect and use this data for the following purposes:

- to display it in the administrative interface of the studies you choose to participate in;
- to measure the performance of Viedoc;
- to improve the design and functionality of Viedoc;
- to investigate issues;
- to protect from, and investigate possible, fraud or misuse of Viedoc; and
- as required by law or regulation, or as requested by authorities.

Sharing, Disclosure and Transfer of Personal Data

Study participation

The purpose of your usage of the Viedoc platform is typically to enable your participation in one or more clinical research studies. This requires us to share your personal data with these studies. This means we share a copy of the personal data you have provided us with, and that this copy is then covered by the Privacy Policy of that study.

Starting with version 4.42 of Viedoc, released on May 27th 2018, such information sharing must be explicitly approved by you. You will be prompted upon login to either approve or reject such requests from the study administrator. (If you log in through the API, any pending study invitations for the study in question will be automatically approved.)

For studies you have been involved in prior to version 4.42 of Viedoc, such information sharing has been implicitly approved and didn’t require your explicit approval. These approvals can however also be explicitly revoked (see *数据保留*).

Locations

Your personal data may be processed by us at locations within People's Republic of China (PRC).

Please note that, as part of having your information shared with studies, your information may be processed at other locations, covered by the Privacy Policy of those studies.

Please also note that whatever location you choose to use Viedoc from, when you access parts of Viedoc where your personal data is disclosed, you are, if only so temporarily, in a strict sense, transferring your personal data to that location. This is important to consider if you are handling personal data of other data subjects as part of the studies you participate in, and we advise you to consult the Privacy Policy of those studies to make sure you do not violate those policies.

Partners

To deliver the Viedoc service we use services provided by Microsoft Azure operated by 21Vianet (Azure China 21Vianet), which is a physically separated instance of cloud services located in mainland China,

independently operated and transacted by Shanghai Blue Cloud Technology Co., Ltd. ("21Vianet"), a wholly owned subsidiary of Beijing 21Vianet Broadband Data Center Co., Ltd. This means your personal data will be processed on this third-party infrastructure, but the data is always encrypted and under our control. We also use services provided by AliYun (also located in mainland China) for email, SMS and encrypted backup storage, and services provided by Amazon Web Services (AWS) operated by Ningxia Western Cloud Data Technology Co., Ltd. ("NWCD", and again, located in mainland China), also for encrypted backup storage.

Merger or Sale

In the event of a sale, merger, liquidation, dissolution, sale or transfer of substantially all our assets, accounts information and/or usage data collected about you in Viedoc may be sold, assigned, or transferred to the party acquiring all or substantially all our equity and/or assets in order to permit the party to continue the operation of Viedoc.

Other Disclosures

We may also access, disclose and preserve your personal data when necessary to (i) comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies, (ii) protect our customers or help prevent the loss of life or serious injury of anyone, (iii) operate and maintain the security of our services, including to prevent or stop an attack on our computer systems or networks, or (iv) protect our rights or properties, including enforcing the terms governing the use of the services.

Correct Personal Data

All the personal data that you manually provide can be accessed and corrected by you. This is done by logging in to Viedoc and using the account features located in the upper right corner. If any of your contact information is incorrect, please update by modifying your profile. In addition to this you can also see aggregated excerpts of the usage data we have collected.

Data Retention

You may choose to remove your account at any time. This is done by first revoking all the study accesses; when you have no approved study accesses and no pending invitations left, an account removal option will appear. Your personal data will be deleted if you choose to go ahead and use this option. The data will be removed from the online service immediately. Unless a longer retention period is required by law, or needed to investigate fraud or misuse of Viedoc, the information is removed from any backups as they cycle.

The copy of your information that you may have shared with studies as part of your participation will be retained according to the Privacy Policy of the respective study/studies.

Use of Cookies and Local Storage

Viedoc uses both cookies and local storage. These are two technologies that we use for temporarily storing information on your computer while you use Viedoc. The purpose is to maintain the state and context of your current usage session, i.e. from the moment you go to the login page of Viedoc and until you log out and close your browser. We do not use your computer to store any personal data at any time and no information of any kind is left behind when you stop using Viedoc.

Your browser is probably set to accept cookies. If you choose to set your browser to refuse cookies, Viedoc will not function properly.

Security

Your personal data integrity is of high concern to us. We have therefore implemented technology and security policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to, such information, reasonably appropriate to the nature of the data concerned.

All information sent to and from Viedoc is always encrypted, and we also encrypt all data at rest.

Viedoc has an optional feature for two-factor authentication that you can enable at any time. If you however participate in a study that requires this, you will also be required to use this.

Please note that you are responsible for ensuring that the computer, tablet or phone (or any other device) that you use to access Viedoc is secure and does not leak information.

Contacting the Data Controller

If you have any questions about this Privacy Policy you can write to:

Data Protection Officer

上海唯到信息科技有限公司

上海汉口路 266 号申大厦 12 楼

中国

You can also email dpo@viedoc.com.

Changes

Please note that we may update this Privacy Policy. You will be required to accept any updates to this Privacy Policy when you first log in to Viedoc after the changes are published. If you do not wish to be bound by any updated Privacy Policy, you can either stop using Viedoc and email us using the contact information in this Privacy Policy and ask for your account to be removed (make sure to send the email from the email address registered on the account), or first accept the updated Privacy Policy and then remove your account yourself.

Governing Law

The validity, construction and performance of this Privacy Policy shall be governed by the substantive laws of People's Republic of China (PRC), without giving effect to any conflict of laws principles. You consent to the exclusive jurisdiction of, and venue in, any court located in People's Republic of China (PRC) for the purposes of adjudicating any matter arising from or in connection with this Privacy Policy.