

INFORMATION NOTICE REGARDING DATA SHARING

As defined in GARDP's External Clinical Data Sharing for Secondary Research Use Policy (accessible here: <https://gardp.org/policies/>), GARDP is committed to the responsible sharing of anonymized data from completed GARDP-sponsored clinical studies with external researchers who are requesting access to this data for their own secondary scientific research objectives and use. GARDP's purpose is to advance scientific knowledge, improve public health outcomes and align with widely accepted clinical research transparency principles.

This responsible sharing is done in respect of the fundamental rights of the clinical study participants to transparency, protection of their privacy, and security of their data, as summarized below:

- **Transparency and compliance to research regulations:** individuals who are participating to GARDP clinical studies are informed and are proposed to provide their consent to the potential sharing of their anonymized data for future purposes that are different from the initial clinical study objectives. Retrospectively, where this information has not been provided and/or the consent for future re-use of anonymized data has not been requested, GARDP has sought advice and received positive feedback from a Swiss Ethics Committee (CCER: "Commission Cantonale d'Ethique de la Recherche sur l'être humain" – Geneva, Switzerland, ref no AO_2026-00068, positive opinion dated 23 September 2026, available upon request) on whether its data sharing framework is ethically acceptable, particularly in the absence of specific participant consent for secondary data sharing.
- **Fundamental rights to the protection of personal data and privacy:** individuals who have participated to GARDP clinical studies can at any time exercise their rights to receive information about the sharing of their anonymized data collected during the study, and oppose this sharing. GARDP will however not be able to ask researchers for erasure of data already anonymized and shared, since the anonymization processes renders the re-identification of individuals from the shared data impossible.
- **Secure data sharing framework:** (1) GARDP's anonymization process complies with the European regulation (General Data Protection Regulation) and European Guidelines, including the requirement to thoroughly assess the risk to re-identify individuals from their anonymised data and to ensure that this risk remains negligible; (2) GARDP uses a data sharing platform (Vivli) that has implemented strong best in-class data security measures; (3) GARDP has implemented a strong governance for data sharing, including contractual and technical safeguards to protect the clinical study participants data during the anonymisation, storage and sharing processes.

For more information, you can also read the GARDP External Clinical Data Sharing for Secondary Research Use Policy accessible here: < <https://gardp.org/policies/> >.

Please contact GARDP's Data Protection Officer to request information and to exercise your rights regarding your personal data and privacy: < dataprivacy@gardp.org >.