



association for  
innovation and biomedical  
research on light and image

# Quality Manual

NP EN ISO 9001:2015

Good Clinical Practices

ECRIN Requirements for Data Centre Certification

General Data Protection Regulation (EU) 2016/679

Ver. n° 36

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## I – PROMULGATION

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This Quality Manual describes the Quality Management System of AIBILI in accordance with the requirements of ISO 9001, Principles of Good Clinical Practices whenever a clinical study is performed, requirements for Certification of ECRIN Data Centre when performing IT and Data Management services within clinical studies and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 when processing personal data and on the free movement of such data.

AIBILI Board of Directors demonstrates the leadership and commitment with respect to the Quality Management System (QMS) and delegates in the President the formal approval of the Quality Policy, Personal Data Protection Policy and Quality Manual.

AIBILI staff is responsible for the implementation, maintenance and improvement of AIBILI's QMS.

THE BOARD OF DIRECTORS

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## II – QUALITY POLICY

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- Ensure to the client and other interested parties, a high quality service that meets their needs and expectations in compliance with the standard ISO 9001, Principles of Good Clinical Practices whenever a clinical study is performed, requirements for Certification of ECRIN Data Centres when performing Data Centre activities, Legislation applicable to the protection of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and Portuguese Law n°58/2019 of 8<sup>th</sup> August, as well as regulatory requirements, statutory and legal, applicable to AIBILI activities;
- Ensure the transfer of basic science to clinical practice and the health market through translational research, thus contributing to the development of the country;
- Maintain adequate and updated technical resources, infrastructure and work environment that allow an effective and efficient response to the needs and expectations of Client as well as to ensure compliance with Client requirements;
- Ensure adequate and continual training of personnel to maintain and improve their competence to carry out the activities for which they are responsible;
- Promote awareness to all personnel of the Quality Management System, the use of the process approach and risk-based thinking so that, in its daily activities, they meet Client and other interested parties requirements and participate in the processes of continual improvement;
- Promote partnership with other interested parties relevant to the quality management system to achieve mutual benefits and continuity;
- Regularly review the performance of the processes and the impact on Client and interested parties, particularly their satisfaction, to implement actions to achieve the improvement of services and the efficiency and effectiveness of the Quality Management System.

THE BOARD OF DIRECTORS

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## III– GENERAL INFORMATION OF AIBILI

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AIBILI - Association for Innovation and Biomedical Research on Light and Image is a Research Technology Organisation in the health area dedicated to the development and clinical research, of new products for medical therapy and diagnostic imaging.

It is a private non-profit organisation, founded in 1989, established to support technology transfer and translational research in the health area.

AIBILI is an Interface Centre recognised by the Economy Ministry. This recognition identifies AIBILI as the technology transfer centre in the health area acting as the facilitating partner between scientific institutions, enterprises and industry in order to bring novel products to the market.

Our Mission – to be a reference partner with the best resources and quality systems in the field of health technology innovation.

Our Vision – to improve human health and wellbeing by converting basic research knowledge into innovative applications.

Our Values - to perform quality services, in an innovative and collaborative manner, to be internationally renowned.

AIBILI is ISO 9001 certified for the following activities:

- Performance of Clinical Studies,
- Planning, Coordination, Monitoring of Clinical Research Activities,
- Health Technology Assessment,
- Grading of Eye Exams,
- Research and Development in New Technologies for Medicine in the areas of Imaging, Optics and Photobiology,
- Data Centre Activities.

AIBILI Data Centre is certified by ECRIN Data Centre requirements.

Clinical Studies are performed in accordance with ICH Guidelines for Good Clinical Practice (GCP), European and national applicable legislations and regulations.

The processing of personal data and the free movement of such data is performed in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and other legislation applicable to the protection of personal data, namely, the Portuguese Law n°58/2019 of 8<sup>th</sup> August.

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### **III– GENERAL INFORMATION OF AIBILI**

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AIBILI is located in the Health Campus of Coimbra University since 1994 and has its own building with 1.454 m<sup>2</sup> and state-of-the-art equipment. Regarding human resources it has a permanent multidisciplinary staff and some part-time individual collaborations mainly for research activities.

AIBILI is a Champalimaud Translational Centre for Eye Research (C-Tracer) since 2010 and part of the C-Tracers Network. For detailed information consult website: [www.fchampalimaud.org](http://www.fchampalimaud.org).

AIBILI is organized in research centres:

- 4C - Coimbra Coordinating Centre for Clinical Research – academic Clinical Trial Unit / CRO
- CEC - Clinical Trial Centre – Clinical Research Centre / Clinical Site
- CORC - Coimbra Ophthalmology Reading Centre
- CNTM - Centre for New Technologies in Medicine

AIBILI also has a Data Centre that provides IT and Data Management services for clinical research studies.

The organizational Units are: Administrative Services (SA), the Translational Research and Technology Transfer Unit (UTT), the Information Technology Unit (IT) and the Quality Management Unit (UGQ).

The Quality Management Unit (UGQ) has a Personal Data Privacy Committee which is responsible for promoting compliance and awareness of applicable personal data protection laws, advising on the implementation of data protection standards and monitoring compliance in AIBILI. Any question regarding personal data protection should be addressed to [privacy@aibili.pt](mailto:privacy@aibili.pt).

The Quality Management Unit (UGQ) has also a Compliance Committee which is responsible for managing and processing whistleblower breach reports in a work related context submitted through an internal channel available at [www.aibili.pt](http://www.aibili.pt).

AIBILI has also an independent Ethics Committee for Clinical Research (CES) to assess the clinical studies as applicable by Law 21/2014 of 16 of April changed by the Law n.º 73/2015 of 27 of July.

AIBILI Board of Directors delegates their functions on the Management Committee that ensure the development and implementation of the management system and continual improvement of its effectiveness.

AIBILI has partnerships with national and international institutions, namely with: ARSC – Health Administration of the Centre Region of Portugal, CF - Champalimaud Foundation, FMUC - Faculty of Medicine of the University of Coimbra, i3S – Institute for Research and Innovation in Health of the

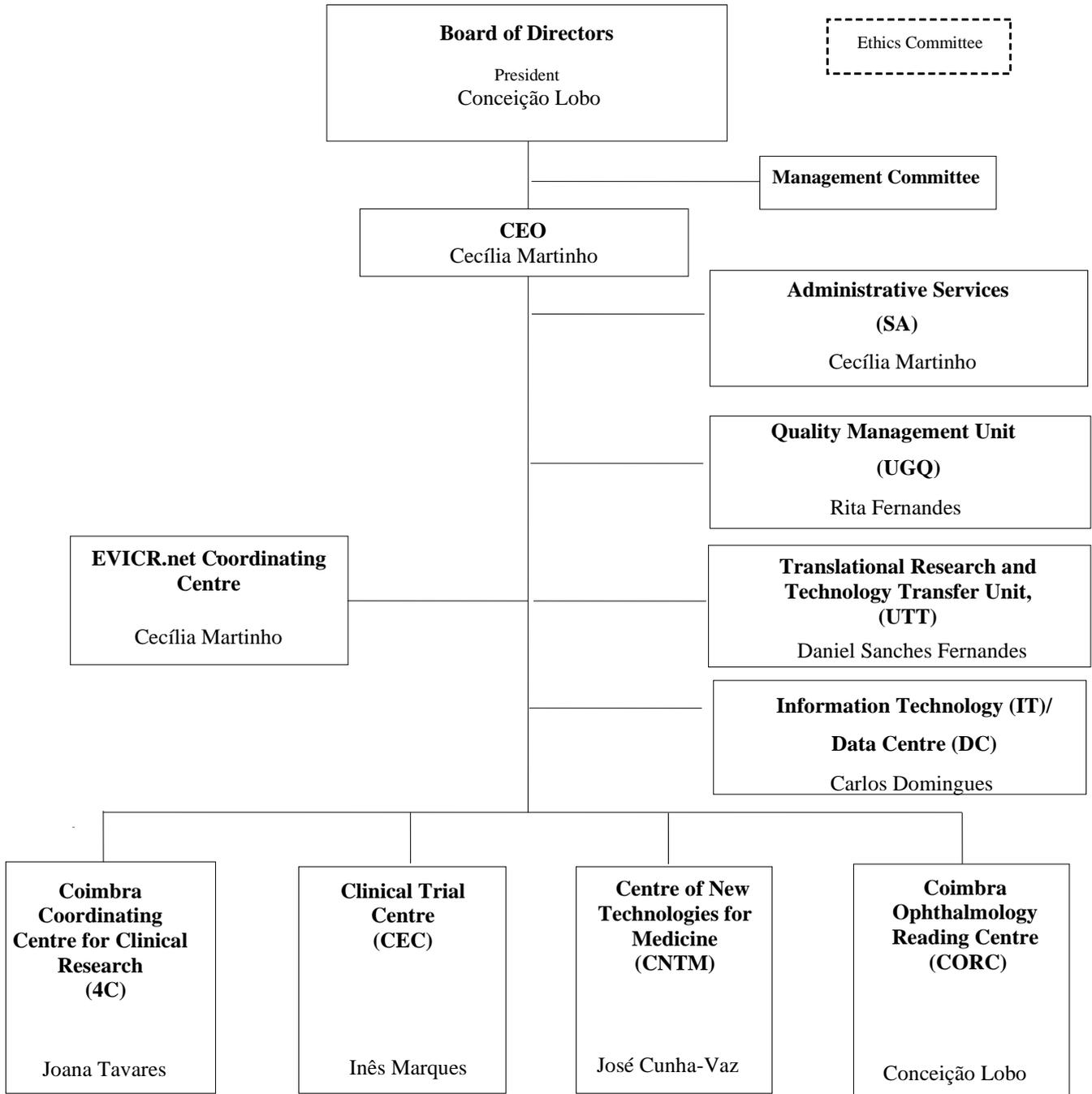
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University of Porto, iCBR - Coimbra Institute for Clinical and Biomedical Research, INFARMED - National Authority of Medicines and Health Products, I.P., Institute for Vision at the Federal University of S. Paulo, S. Paulo, Brazil, L.V. Prasad Eye Institute, Hyderabad, India, José de Mello Saúde – Hospital CUF Coimbra, P-BIO – Portugal’s Biotechnology Industry Organization and others. The main goals of AIBILI are **translational research and innovation** contributing to the conversion of basic research knowledge into practical applications in order to improve human health and wellbeing. For detailed information, consult website: [www.aibili.pt](http://www.aibili.pt).

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#### **EVICR.net – European Vision Institute Clinical Research Network**

AIBILI is the Coordinating Centre of the European Vision Institute Clinical Research Network – EVICR.net, an independent European Economic Interest Grouping (EEIG), established in 2010 in accordance with the Council Regulation (EEC) n.° 2137/85.

EVICR.net is a disease-oriented network of European Ophthalmological Clinical Research Sites, dedicated to perform multinational clinical research in ophthalmology with the highest standards of quality, following the European, International Directives for Clinical Research and ICH-GCP Guidelines. It is mainly dedicated to support multinational Investigator Initiated Research (IIR). Scientifically it is organized by ophthalmology subspecialty Expert Committees. For detailed information consult website: [www.evicr.net](http://www.evicr.net).

EVICR.net is as a fundamental resource for the development of translational research in the European Union in the area of Ophthalmology and Vision Sciences.

#### **4C - Coimbra Coordinating Centre for Clinical Research**

The Coimbra Coordinating Centre for Clinical Research (4C) is a structure to support the development and coordination of Investigator Initiated Research (IIR) and Industry-Sponsored Clinical Studies by providing the following services:

- Protocol design and Statistical planning
- Study documents elaboration
- Submission to the Regulatory Authorities
- Coordination and Study implementation
- Monitoring and Quality Control
- Data Management
- Development of Electronic Data Capture Solutions – with AIBILI Data Centre
- Periodic Reports to the Sponsor and/or Regulatory Authorities
- Statistical analysis and Final Study Report
- Medical Writing and Publication support
- Investigational Medical Product Management
- Archiving
- Health Technology Assessment Activities

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Regarding health technology assessment activities, they are performed by a former Centre for Health Technology Assessment and Drug Research (CHAD) that is now a Sub-division of Coimbra Coordinating Centre for Clinical Research (4C) and is focused on evaluation of medicines and other medicinal products for market access purposes, aiming at financing and reimbursement and pharmacovigilance.

The CHAD provides scientific information to support the decision making in healthcare policy and practice. Health Technology Assessment studies are necessary to ensure equity in the access to medicines and the most favourable benefit/risk and cost/effectiveness ratios. It is, therefore, of capital importance in both drug reimbursement decisions at both ambulatory and hospital settings.

CHAD is also a qualified resource to work closely with Pharmaceutical Industry in all the different phases of drug development.

CHAD performs pharmacovigilance services necessary in clinical studies. It is also responsible for the Pharmacovigilance Unit of Coimbra of the National Pharmacovigilance System since 2008, contracted with the National Authority of Medicines and Health Products (INFARMED, IP).

#### **CEC - Clinical Trial Centre**

The Clinical Trial Centre (CEC) performs clinical patient-oriented research that involves characterizing disease progression and testing new therapies by carrying out controlled research studies in patients, i.e., clinical trials. It has been involved in studies focused on ophthalmology, diabetes and neurology. CEC has excelled in multinational randomized clinical trials and clinical studies with special emphasis in ophthalmology since 1991. CEC has dedicated facilities, qualified and experienced staff and the most updated ophthalmological equipment.

CEC is a certified Clinical Site of Excellence by the EVICR.net - European Vision Institute Clinical Research Network (CS 01), since 2005.

#### **CORC – Coimbra Ophthalmology Reading Centre**

The Coimbra Ophthalmology Reading Centre (CORC) serves as a Central Reading Centre for multinational and multicentric clinical studies as well as for the Diabetic Retinopathy Central and South Region of Portugal Screening Programme, mainly in the areas of posterior segment/retinal diseases as Diabetic Retinopathy (DR), and Age-related Macular Degeneration (AMD), Retinitis

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Pigmentosa (RP), Retinal Vein Occlusion (RVO) and anterior segment diseases as Neurotrophic Keratitis and Dry-Eye.

CORC focus its activities on grading retinal diseases on fundus images, OCT and OCTA images of the retina for characterization and quantification of ophthalmic disease, functional evaluations of the retina using mfERG and visual fields as well as on grading anterior segment photography.

Since 2011, CORC is the central Reading Centre for the Diabetic Retinopathy Screening Programme of the Central Region of Portugal.

CORC has a secure custom-designed web-based tool ([www.studies.corc.pt](http://www.studies.corc.pt)) to transmit images between Clinical Sites and CORC. This system is hosted in the AIBILI Data Centre.

For grading purposes CORC uses licensed software from the equipment suppliers and other common applications for imaging edition and analysis.

For research purposes CORC also has novel software programmes, developed in-house, to reliably quantify neovascularization of the retina and leakage, assess microaneurysm turnover in diabetic patients (RetmarkerDR® product), classify and quantify AMD lesions and disease activity in patients with AMD (RetmarkerAMD Research product) and perform segmentation of the retinal layers and quantify cystoid-like spaces on OCT.

CORC has all the necessary human resources for grading retinal images as well as to certify technicians and equipment of the Clinical Sites participating in clinical studies.

#### **CNTM - Centre of New Technologies for Medicine**

The Centre of New Technologies for Medicine (CNTM) develops new medical diagnostic techniques with special emphasis on the area of eye fundus imaging.

The goal of CNTM is innovation in eye imaging and transfer these technological innovations to the Industry and, therefore to the market, bringing better diagnostic imaging technologies. It works closely with CEC, performing translational research in vision and imaging, and with CORC by developing software tools for grading analysis. The excellence of the work developed in CNTM is well demonstrated by frequent publications in peer reviewed international scientific journals.

CNTM has developed the concept of Multimodal Macula Mapping, the algorithm developed in house, that lead in the product Retmarker® that is available in the market and provides information to monitor the progression of retinal diseases by correlation of sequential fundus imaging and automatic lesion

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detection. Presently OCT-Leakage, a novel analysis on the permeability of the Blood-Retinal Barrier using non-invasive method was published in the European Patent Bulletin. The protection of the intellectual property of the OCT-Leakage in the United States Patent and Trademark Bulletin is being finalized with the Patent intention already achieved.

The process of technology transfer is really initiated by innovation at the laboratory level well before the development of applications that can be later on tested in clinical studies. This research has led to R&D contracts with Industry.

As the result of the work developed in CNTM the following international patents were granted:

- Ocular Fluorometer for Clinical Use, US Patent n.º 6,013,034. 05/11/1997.
- Method and Apparatus for Measuring Quantity of a Fluorochrome in a Biological Environment, WO/2008/067525. 20/11/2008.
- System for Analysing Ocular Fundus Images, US Patent n.º 7,856,135. 02/12/2009.
- Method and device for the non-invasive indirect identification of sites of alterations of the Blood-Retinal Barrier, EPO Patent 3 289 565 B1.

#### **DC - Data Centre**

AIBILI Data Centre was built specifically to support AIBILI's information systems but the existing space and environment conditions allow to grow up to store clients/partners data and information. AIBILI Data Centre services are provided by the Information Technology (IT) and 4C.

AIBILI Data Centre is certified by ECRIN Data Centre requirements since 2016 , meeting the ECRIN requirements for IT and Data Management within Clinical Studies and complies with EU Directive 2001/20/EC for the implementation of GCP, Good Practice for Computerised Systems in Regulated GXP Environments, PIC/S Inspectors Guide, FDA Guidance for Industry, Computerized Systems Used in clinical studies and 21 CFR Part 11, GAMP 5, ISO27000 and ISO 9001, among others.

The services provided by AIBILI Data Centre are: design and development Electronic Case Report Forms (eCRF); development of Digital Grading Forms; support Clinical Data Management Application (CDMA); support Reading Center Platforms (studies.corc.pt), users/key-users training, IT support, Data Management and Long Term Data Storage. Other services, such as data entry might be performed together with other AIBILI Units.

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#### **AIBILI Code of Business Conduct and Ethics**

AIBILI established a Code of Business Conduct and Ethics as guidelines on professional ethics and conduct for all AIBILI employees to ensure a quality service that complies with International Standards and guidelines (e.g. ISO 9001, Principles of Good Clinical Practices, requirements for Certification of ECRIN Data Centre) as well as regulatory requirements, statutory and legal applicable to AIBILI activities.

Therefore, AIBILI employees should be guided by honesty and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between professional and personal relationships.

AIBILI is committed to providing a work environment that strives to protect employee health and safety which are important aspects of job performance. AIBILI has insurance policies of professional liability risks for each of its areas that are intended to cover the costs of any damage resulting from their activities.

Work relationship between employees should be based on trust, honesty and mutual respect, promoting collaboration and team spirit.

Employees must be aware of the importance of their duties and responsibilities and behave in order to maintain and strengthen public confidence in AIBILI and contribute to the effective functioning and the good image of the Institution. Employees must, in the exercise of their activities, be responsible for the correct use of equipment and AIBILI facilities.

Confidential information is a valuable corporate asset that merits the same protection as AIBILI's physical assets. It is very important to protect confidential information. Each employee must preserve and protect from unauthorized disclosure any confidential information.

Also, AIBILI is aware that rapid technological developments and globalization have brought new challenges for the protection of personal data so that efficient and correct processing of personal data, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data (General Data Protection Regulation) and other applicable legislation, namely the Portuguese Law n°58/2019 of 8<sup>th</sup> August is an essential and intrinsic condition for the activity itself.

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Thereafter, AIBILI commits itself to:

- Establish a strategy and development plans for Personal Data Protection, measuring and evaluating the results achieved, to ensure its efficiency, effectiveness and continuous improvement.
- Strengthen the culture within AIBILI regarding Personal Data Protection, considering this theme as a priority in the performance of its activity.
- Implement and maintain mechanisms and procedures that ensure lawfulness, loyalty, transparency, minimization, accuracy, integrity, confidentiality and responsibility in the processing of personal data in information systems, in the management of organizational units and in meeting the needs of its customers, both internal and external, in order to maintain credibility and trust in the AIBILI “brand”;
- Implement and maintain mechanisms and procedures designed to ensure the processing of personal data of its customers, employees and partners.
- Comply with the legislation and regulations applicable to the Protection of Personal Data.
- Ensure the creation of a governance model for AIBILI defining the appointment, position and function of the Personal Data Protection Committee.
- Establish the mechanisms and procedures necessary for the exercise of rights by the holders of personal data.
- Implement internationally recognized best practices and technical and organizational data protection measures and ensure compliance with all partners and stakeholders in the design, development and maintenance of personal data processing performed at AIBILI.
- Ensure an information security development strategy and plans to ensure its effectiveness and continuous improvement.
- Promote the supervision and monitoring of entities involved in AIBILI, regarding compliance with requirements, established procedures and obtaining the planned results, with a view to the permanent improvement of quality and safety.

AIBILI is committed to the processing of personal data, throughout all cycles of personal data processing and in the different contexts in which it carries out its activity, in strict compliance with legal dictates and with the best international practices. All employees must comply with and respect the principles and AIBILI’s Data Protection Policy. AIBILI’s has also Policy and Internal Rules for the

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Protection of Personal Data and Privacy of Employees where provides detailed information on how their Personal Data are handle according to Personal Data Protection Legislation.

In case there is a situation of negligence, misconduct or fraud (scientific or otherwise) of an employee the situation should be immediately reported to the Director, the CEO and Quality Management Unit in order to define the corrective actions. If the situation has implications for the Service, compliance the Client will be informed of the measures taken.

AIBILI exercises the right to compensation and civil lawsuit over employee in respect of any damage to the Institution and to third parties (e.g stakeholders, Clinical Study Volunteers, suppliers, etc) resulting from fraudulent acts, negligence activity or misconduct.

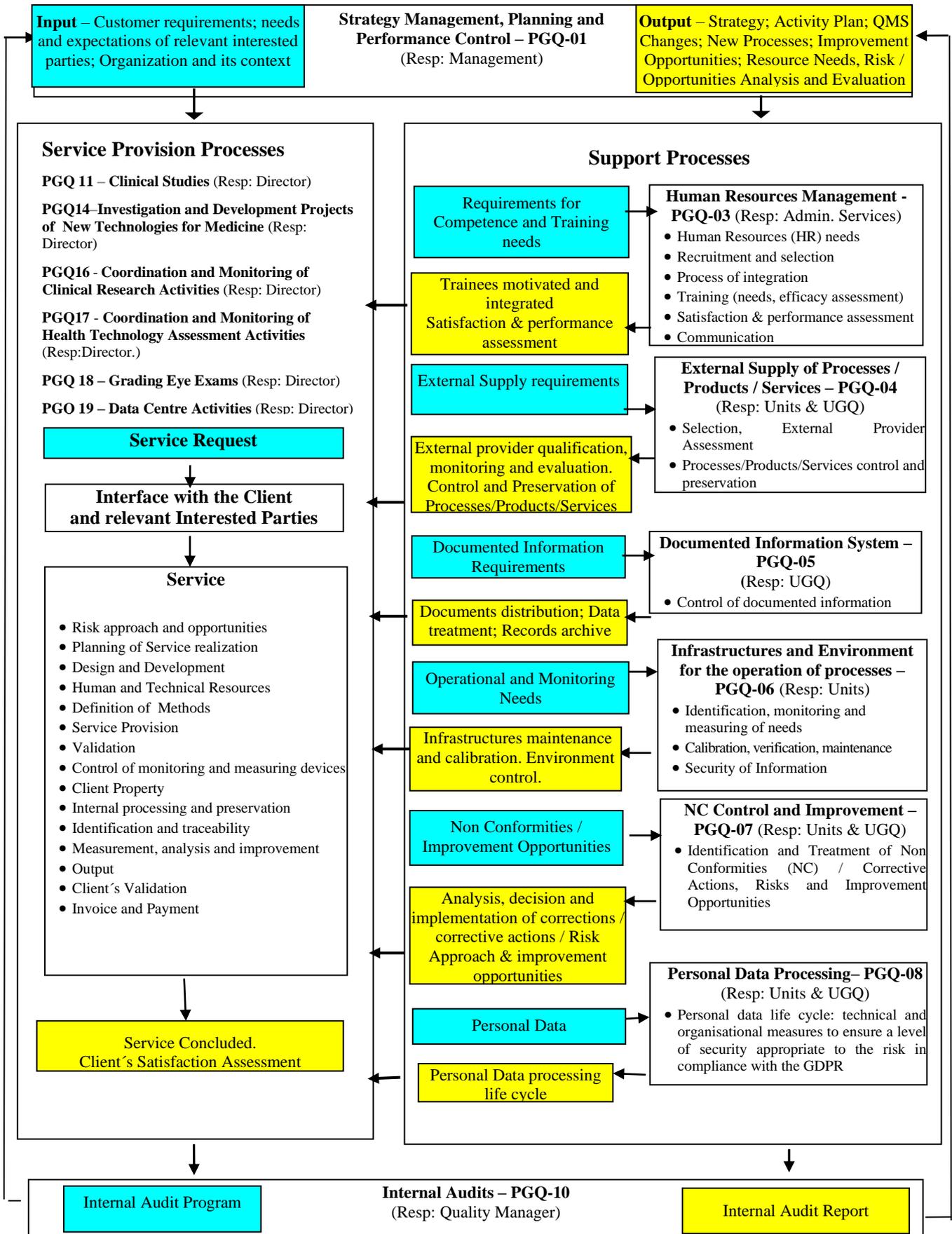
All employees are required to sign a “Declaration of Confidentiality, Personal Data Protection and Interests” - Imp.03-01-03 agreeing to comply with the procedures according to the Quality Management System and regulatory requirements, statutory and applicable law, protect AIBILI’s confidential information and declaring that will not be involved in any activity that may jeopardize the expected trust on his/her competences, impartiality, operational evaluation or integrity and confirming that has no proprietary, financial, professional or other interest of any nature or kind in any product, service and/or company that could be construed as influencing his/her position within AIBILI.

The terms of this “Declaration of Confidentiality, Personal Data Protection and Interests” - Imp.03-01-03 signed by each employee and related to confidentiality of data will survive even after the termination of their functions.

An internal reporting channel is also available at [www.aibili.pt](http://www.aibili.pt) where information on breaches occurred in the context of work-related activities with AIBILI may be reported.

## APPENDIX 1 – QUALITY MANAGEMENT SYSTEM – PROCESSES INTERRELATION

The Quality Management System (QMS) is supported by processes with the following interrelation:



## APPENDIX 2 - CORRELATION WITH NP EN ISO 9001:2015

| Quality Manual and Procedures   | Requirements of NP EN ISO 9001:2015 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |      |      |
|---|-------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|------|
|   | 4                                   | 5.1 | 5.2 | 5.3 | 6.1 | 6.2 | 6.3 | 7.1 | 7.2 | 7.3 | 7.4 | 7.5 | 8.1 | 8.2 | 8.3 | 8.4 | 8.5 | 8.6 | 8.7 | 9.1 | 9.2 | 9.3 | 10.2 | 10.3 |
| I - Promulgation  | ■                                   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |      |      |
| II - Quality Policy   |                                     |     | ■   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |      |      |
| III- General Information  | ■                                   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |      |      |
| PGQ 01- Strategy Management, Planning and Performance Control                   | ■                                   | ■   | ■   |     | ■   | ■   | ■   |     |     | ■   | ■   |     | ■   |     |     |     |     |     |     | ■   |     | ■   |      |      |
| PGQ 03-Human Resources Management   |                                     | ■   |     | ■   |     |     |     | ■   | ■   | ■   |     |     |     |     |     |     |     |     |     |     |     |     |      |      |
| PGQ 04-External Supply of Processes / Products / Services                       |                                     |     |     |     | ■   |     | ■   | ■   |     |     |     | ■   |     |     | ■   | ■   | ■   | ■   |     |     |     |     |      |      |
| PGQ 05- Documented Information System   |                                     |     |     |     |     |     |     |     |     |     |     | ■   |     |     |     |     | ■   |     |     |     |     |     |      |      |
| PGQ 06- Infrastructures and Environment for the operation of processes          |                                     |     |     |     |     |     |     | ■   |     |     |     |     |     |     |     |     | ■   |     |     |     |     |     |      |      |
| PGQ 07- Improvement Management  |                                     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     | ■   |     |     |     | ■    | ■    |
| PGQ 08- Personal Data Processing  | ■                                   | ■   |     |     | ■   |     | ■   |     |     | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   |     |      |      |
| PGQ 10-Internal Audits  |                                     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     | ■   |     |      |      |
| PGQ 11- Clinical Studies  | ■                                   | ■   |     |     | ■   | ■   | ■   |     |     | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   |     |      |      |
| PGQ 14- Investigation and Development Projects of New Technologies for Medicine | ■                                   | ■   |     |     | ■   | ■   | ■   |     |     | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   |     |      |      |
| PGQ 16 –Coordination & Monitoring of Clinical Research Activities               | ■                                   | ■   |     |     | ■   | ■   | ■   |     |     | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   |     |      |      |
| PGQ 17 – Coordination & Monitoring of Health Technology Assessment Activities   | ■                                   | ■   |     |     | ■   | ■   | ■   |     |     | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   |     |      |      |
| PGQ 18 – Grading Eye Exams  | ■                                   | ■   |     |     | ■   | ■   | ■   |     |     | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   |     |      |      |
| PGQ 19 – Data Centre Activities   | ■                                   | ■   |     |     | ■   | ■   | ■   |     |     | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   | ■   |     |      |      |

Legend:

■ applicable;

□ not applicable

## APPENDIX 3 - CORRELATION WITH PRINCIPLES OF GOOD CLINICAL PRACTICES - Law n°21/2014, 16 of April changed by the Law n.°73/2015, 27 of July

| Quality Manual and Procedures   | GCP Requirements applicable to AIBILI- Articles of Law n°21/2014, 16 of April and those changed# by the Law n.° 73/2015, 27 of July |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
|---|---|--------|---------|---------|---------|---------|---------|---------|---------|----------|----------|------------|----------|----------|----------|----------|----------|----------|----------|---------|-----------------|----------|----------|----------|----------------|-------|-------------|----------------|---------|---------|--------|--------|---------|--|---|---|
|   | Art.1°  | Art.2° | Art. 3° | Art. 4° | Art. 5° | Art. 6° | Art. 7° | Art. 8° | Art. 9° | Art. 10° | Art. 11° | Art. 11°-A | Art. 12° | Art. 13° | Art. 14° | Art. 15° | Art. 16° | Art. 17° | Art. 18° | Art.19° | Art 20, Art 22° | Art. 23° | Art. 25° | Art. 26° | Art. 27° a 31° | Art32 | Art33 e 34° | Art. 36° e 37° | Art.38° | Art.39° | Art.40 | Art.42 | Art.51° | & Art.5°,16,17,21, 24,28,33a39, 43a46,51,52a56 |   |   |
| I - Promulgation  | ■   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| II - Quality Policy   |   |        | ■       | ■       |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| III- General Information  |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 01- Strategy Management, Planning and Performance Control                     |   |        |         |         |         |         |         |         |         |          |          |            |          |          | ■        |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 03-Human Resources Management   |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 04-External Supply of Processes / Products / Services                         |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 05- Documented Information System   |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 06- Infrastructures and Environment for the operation of processes            |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 07- and Improvement Management  |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 08- Personal Data Processing  | ■   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 10-Internal Audits  |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 11- Clinical Studies*   | ■   | ■      | ■       | ■       | ■       | ■       | ■       | ■       | ■       | ■        | ■        | ■          | ■        | ■        | ■        | ■        | ■        | ■        | ■        | ■       | ■               | ■        | ■        | ■        | ■              | ■     | ■           | ■              | ■       | ■       | ■      | ■      | ■       | ■  | ■ | ■ |
| PGQ 14- Investigation and Development Projects of New Technologies for Medicine * | ■   | ■      | ■       | ■       | ■       | ■       | ■       | ■       | ■       | ■        | ■        | ■          | ■        | ■        | ■        | ■        | ■        | ■        | ■        | ■       | ■               | ■        | ■        | ■        | ■              | ■     | ■           | ■              | ■       | ■       | ■      | ■      | ■       | ■  | ■ | ■ |
| PGQ 16 –Coordination & Monitoring of Clinical Research Activities**               |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 17 – Coordination & Monitoring of Health Technology Assessment Activities     |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 18 –Grading Eye Exams   |   |        |         |         |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |
| PGQ 19 – Data Centre Activities   | ■   | ■      | ■       | ■       |         |         |         |         |         |          |          |            |          |          |          |          |          |          |          |         |                 |          |          |          |                |       |             |                |         |         |        |        |         |  |   |   |

Note: \* Investigator’s Responsibility; \*\* Sponsor’s Responsibilities; & applicable to Regulatory Authorities.

Legend:   applicable;   not applicable

## APPENDIX 4 - CORRELATION WITH ECRIN REQUIREMENTS FOR DATA CENTRE CERTIFICATION - VERSION N°4

| Quality Manual and Procedures  | ECRIN Requirements for Data Centre Certification |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
|--|--|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
|  | GE 01  | IT 01 | IT 02 | IT 03 | IT 04 | IT 05 | IT 06 | DM 01 | DM 02 | DM 03 | DM 04 | DM 05 | DM 06 | DM 07 | DM 08 | DM 09 | ST 01.01 | ST 01.02 | ST 01.03 | ST 01.04 | ST 01.05 | ST 01.06 | ST 01.07 | ST 01.08 | ST 01.09 |
| PGQ19  |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-01 - Management of Data Centre Services  |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-02 - Server Management   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-03 - Security Access Management  |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-04 - Business Continuity   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-05 - General System Validation   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-06 - Extracting and Reporting Data   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-07- Data Management  |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-08 - General Standards   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 19-09 - Local Software Development  |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 16-08 - Randomization, Blinding and Unblinding Procedure  |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| IT 16-09 - Protocol Deviation and Serious Breach Procedure   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| PGQ03-Human Resources (HR) Management; IT3-3 - Management of HR Competences  |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| PGQ07 - Non Conformities Control and Improvement; IT 07-01 - Records of Non Conformities Control and Improvement actions |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| PGQ 08- Personal Data Processing   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |
| PGQ10-Internal Audits; IT10-1- Quality Internal Audits   |  |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |          |          |          |          |          |          |          |          |          |

Legend:   applicable ;   not applicable

## APPENDIX 5 - CORRELATION WITH GENERAL DATA PROTECTION REGULATION (EU) 2016/679 OF 27th April 2016

| Procedures  | art.4,5,6,8,9,15,16,17,18,19,20,21,22, 24,25,26,27,28,29,30,31,32,33,34,35, 36,37*,38*,39*,44,45,46,48,49,88,89; considerandos 32,33,39,42,43,58 a 63,65 a 72,74 a 79,82,83,84,85 a 94, 96,97,101 a 115,129,132,156,157,159,169 | art.5,12,15,16,17,18,19,20,21, 22,23,30,31,38*,39*,89; considerandos 32,33,39,42,43,58 a 63,65 a 72,82,129,132,156,157,159 | art.31,33,34,38*,39* considerandos 39,58, 59,60,74 a 78,83,85 a 88,97 | art.7,13,88 | art.8,9, 89 | art.28,29,32, considerandos 81,83,95 | art.33, 34 | considerandos 32,33,38,39, 40 a50,61 a 63 | art. 39* |
|---|---|--|---|-------------|-------------|--------------------------------------|------------|---|----------|
| IT 01-04- Procedure for Internal Whistleblower Report                           |   |  |   |             |             |                                      |            |   |          |
| PGQ 03-Human Resources Management   |   |  |   |             |             |                                      |            |   |          |
| PGQ 04-External Supply of Processes / Products / Services                       |   |  |   |             |             |                                      |            |   |          |
| PGQ 07- Improvement Management  |   |  |   |             |             |                                      |            |   |          |
| PGQ 08- Personal Data Processing  |   |  |   |             |             |                                      |            |   |          |
| IT 08-1 - Management of personal data processing life cycle                     |   |  |   |             |             |                                      |            |   |          |
| IT 08-2 - Data Subject Exercise of Rights                                       |   |  |   |             |             |                                      |            |   |          |
| IT 08-3 - Management of Personal Data Breach                                    |   |  |   |             |             |                                      |            |   |          |
| PGQ 10-Internal Audits  |   |  |   |             |             |                                      |            |   |          |
| PGQ 11- Clinical Studies  |   |  |   |             |             |                                      |            |   |          |
| PGQ 14- Investigation and Development Projects of New Technologies for Medicine |   |  |   |             |             |                                      |            |   |          |
| PGQ 16 –Coordination & Monitoring of Clinical Research Activities               |   |  |   |             |             |                                      |            |   |          |
| PGQ 17 – Coordination & Monitoring of Health Technology Assessment Activities   |   |  |   |             |             |                                      |            |   |          |
| PGQ 18 – Grading Eye Exams  |   |  |   |             |             |                                      |            |   |          |
| PGQ 19 – Data Centre Activities   |   |  |   |             |             |                                      |            |   |          |

Legend:\*DPO is not mandatory regarding our activity (art°37). AIBILI has a Personal Data Protection Committee

applicable ;

Not applicable;