

Inipharm Privacy Notice

Last Updated: November 1, 2022

This Privacy Notice is designed to help you understand how Inipharm, Inc. (“**Inipharm**,” “**we**,” “**us**,” or “**our**”) collects, uses, and shares your personal information, and to help you understand and exercise your privacy rights.

1. SCOPE AND UPDATES TO THIS PRIVACY Notice
2. PERSONAL INFORMATION WE COLLECT
3. HOW WE USE YOUR PERSONAL INFORMATION
4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION
5. YOUR PRIVACY CHOICES AND RIGHTS
6. SECURITY OF YOUR INFORMATION
7. INTERNATIONAL DATA TRANSFERS
8. RETENTION OF PERSONAL INFORMATION
9. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS
10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS
11. CHILDREN’S INFORMATION
12. OTHER PROVISIONS
13. CONTACT US

1. SCOPE AND UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice applies to personal information processed by us, including on our websites and other online or offline offerings. To make this Privacy Notice easier to read, our websites and other offerings are collectively called the “**Services**.”

Inipharm may provide additional privacy notices to individuals at the time we collect their personal information. For example, we may provide a specific privacy notice to participants that describes our privacy practices in connection with conducting clinical trials or when you submit your information for recruitment to one of our clinical trials. These additional privacy notices may supplement this Privacy Notice or may apply in lieu of this Privacy Notice.

Changes to our Privacy Notice. We may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Notice if you continue to use our Services after the new Privacy Notice takes effect.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Information.** We may collect personal information when in connection with the creation or administration of your account including, but not limited to, name, email address, and professional details.
- **Enrollment and Clinical Trial Referral Information.** If you enroll in certain Services, such as our patient support programs, or if you request to be matched to one of our clinical trial sites through one of our referral websites, we may collect personal information such as your name, email address, phone number, physical address, date of birth, and relevant information about your medical history.
- **Clinical Trial Participants.** If you participate in clinical trials that we sponsor, our clinical trial sites may collect personal information such as your driver's license, passport number, tax identification number, health information related to your medications, medical history, medical insurance details, physical and mental health conditions, diagnoses, treatments, genetic information, and family medical history, and other relevant information in connection with your participation in clinical trials. Please note that the clinical trial site may be a separate "controller" or "business" of your personal information and your personal information may be subject to the clinical trial site's privacy policy. We collect personal information about you from clinical trial sites only where you have provided your consent to disclose that information to us or as required by law.
- **Regulatory Information.** We may collect personal information where required to comply with regulatory requirements, including information relating to any adverse events you may have experienced when using our products.
- **Healthcare Professionals.** If you are a healthcare professional, we may collect personal information such as your professional contact information, credential and institutional affiliations information, information about our programs and activities in which you have participated, information about our interactions with you, information about your published papers, your photograph, information about your prescribing of our products and services, and information contained in agreements executed with us.
- **Patient Advocates.** If you are a patient advocate, we may collect personal information such as your name, email address, and phone number.
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter, request support, or otherwise communicate with us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the

public sharing features of the Services will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.

- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- **Automatic Collection of Personal Information.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookie Policy (and Other Technologies).** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies (“Technologies”) to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed; and
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.

See "[Your Privacy Choices and Rights](#)" below to understand your choices regarding these Technologies.

- **Analytics.** We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services. Some of our analytics partners include:
 - **Google Analytics.** For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics' Privacy Policy](#). To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).

C. Personal Information Collected from Other Sources

Third-Party Services and Sources. We may obtain personal information about you from other sources, including through third-party services and organizations. For example, we may obtain samples from universities and/or hospitals in order to carry out research and development. In addition, if you are a healthcare professional, we may collect personal information such as hospital affiliation, license information, areas of interest, contact information such as address, email, and phone number, and other due diligence related information from various sources.

Referrals and Sharing Features. Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Notice;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns, text messages, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices, you may contact us at any time as set forth in [“Contact Us”](#) below.

D. With Your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **Automated Decision Making.** We may engage in automated decision making, including profiling. Inipharm's processing of your personal information will not result in a decision based solely on automated processing that significantly affects you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making. If you have questions about our automated decision making, you may contact us as set forth in "[Contact Us](#)" below.
- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Clinical Research Organizations.** If you participate in clinical trials and research, the clinical trial sites may disclose any personal information you provide in conjunction with your participation to the Clinical Research Organization ("**CRO**") that we have engaged to manage the research or conduct the clinical trial. We endeavor not to collect clinical trial participant personal information directly, and other than pharmacovigilance data, all personal information we receive from CROs about clinical trial participants is de-identified or pseudonymized unless an exception applies.
- **Clinical Trial Sites.** If you request to be matched with a clinical trial site through our Services, we may share your personal information with the clinical trial site so that the clinical trial site can contact you about participating in the trial.
- **Research Partners.** We may share your personal information with our research partners.

- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our corporate affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Notice).
- **Text Messages.** If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in “[Contact Us](#)” below.
- **Phone Calls.** If you receive an unwanted phone call from us, you may opt out of receiving future phone calls from us by following the instructions which may be available on the call or by otherwise contacting us as set forth in “[Contact Us](#)” below.

- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Personalized Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access to and Portability of Your Personal Information**, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the “right of data portability”);
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information; and
- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing, and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in [“Contact Us”](#) below. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any

information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Notice for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides California residents with the right to know what categories of personal information Inipharm has collected about them, and whether Inipharm disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

Category of Personal Information Collected by Inipharm	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers	<ul style="list-style-type: none">• Service providers• Clinical research organizations• Clinical trial sites• Research partners

Category of Personal Information Collected by Inipharm	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Service providers • Clinical research organizations • Clinical trial sites • Research partners
Protected classification characteristics under California or federal law	<ul style="list-style-type: none"> • Service providers • Clinical research organizations • Clinical trial sites • Research partners
Biometric information	<ul style="list-style-type: none"> • Service providers • Clinical research organizations • Clinical trial sites • Research partners
Internet or other electronic network activity	<ul style="list-style-type: none"> • Service providers
Professional or employment-related information	<ul style="list-style-type: none"> • Service providers

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in “[Personal Information We Collect](#)” and “[How We Use Your Personal Information](#)” above, respectively.

Additional Privacy Rights for California Residents

“Sales” of Personal Information under the CCPA. For purposes of the CCPA, Inipharm does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth in “[Contact Us](#)” below for additional instructions.

Verification. To protect your privacy, we will take steps to reasonably verify your identity before fulfilling your request. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, or to answer questions regarding your account and use of our Services.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

De-Identified Information. If we create or receive de-identified information, we will not attempt to reidentify such information, except to comply with applicable law.

10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in "[Contact Us](#)" below.

11. CHILDREN'S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.]

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in "[Contact Us](#)" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account, if applicable.

12. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. If your personal information is subject to the applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe our processing of your personal information violates applicable law.

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner's Office \(ICO\)](#)

13. CONTACT US

Inipharm is the controller of the personal information we process under this Privacy Notice.

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact us at:

Inipharm, Inc.
500 108th Ave NE #1100

Bellevue, WA 98004

privacy@inipharm.com