

PACT's Privacy Statement

Last Updated: December 4, 2019

PACT Pharma, Inc. (“**PACT**”) is committed to protecting and respecting your privacy and ensuring that your personal information is processed fairly and lawfully in line with all relevant privacy legislation. The purpose of this Privacy Statement is to set out the principles governing our use of personal information that we may obtain about you through this website (the “**Site**”) or through any other means. By using this Site, you agree to our use of the personal information that we obtain about you.

Please read this Privacy Statement carefully. We may change our Privacy Statement from time to time. We therefore ask you to check it occasionally to ensure that you are aware of the most recent version that will apply each time you access this Site. **BY USING THIS SITE, YOU AGREE TO THIS PRIVACY STATEMENT. IF YOU DO NOT AGREE TO THIS PRIVACY STATEMENT, DO NOT USE THIS SITE.**

For your convenience, this Site may contain links to a number of other websites. The privacy policies and procedures described here do not apply to those sites; we suggest contacting those sites directly for information on their data collection and distribution policies. Any reference to a linked site or any specific third party product or service by name does not constitute or imply its endorsement by us, and you assume all risk with respect to its use.

Your Data

We may collect, use, store and transfer the following information to provide, improve and protect our Site and our Products.

The data we collect and process. You may give us personal information by visiting or interacting with the Site, filling in forms on the Site, or by corresponding with us by phone, e-mail, or otherwise. This personal information includes the following data which are referred to in this Privacy Statement as ‘your data’, ‘your personal data’ or ‘your personal information’:

- personal information you provide when you interact with the Site. The personal information you give us may include your name, title, company, mailing address, email address, phone number, password, resume information, feedback and any other information you choose to provide to us;
- technical data such as your internet protocol (IP) address, your login data, the web page you visited before visiting our Site, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Site;
- usage data which tells us how you use our Site;

- marketing and communication data which tells us your preference in receiving marketing from us and our third parties and your communication preferences; and
- sensitive personal data such as your race or ethnicity, your political opinions, religious beliefs, membership in a trade union, physical or mental health condition, sexual orientation, or criminal offenses. As mentioned in elsewhere in this Privacy Statement, the Site may include links to third-party websites, plug-ins and applications. These third parties may ask you for your consent to the collection of your sensitive personal information, such as when you submit an online job application. We do not control these third parties and are not responsible for their privacy policies. However, if your sensitive personal information is transferred to us from a third party, we may rely on your consent to the collection of personal information given to the third party for our processing.

Purposes for which we will use your data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

The ways we plan to use your personal data are as follows

- *Usage.* We also use your data, especially usage data and technical data, including the actions you take in your account (such as Site visits, page interaction information, and search history), to evaluate and improve our Site .
- *Cookies and other technologies.* We use technologies like cookies to provide, improve, protect, and promote our Site. More information on our use of cookies is available on our Cookies Policy. PACT currently does not respond to Do Not Track requests.
- *Relationship.* We will also use your data to manage our relationship with you which will include notifying you about changes our Privacy Statement and asking you to leave a review or take a survey.

Sharing your data

We may share information as discussed below, but we won't sell it to advertisers or third parties.

Others working for PACT. PACT uses trusted third parties (i.e. IT services, analytics services, etc.) to help us provide, improve, protect, and promote our Site. These third parties will access your information only to perform tasks on our behalf in compliance with this Privacy Statement, and we'll remain responsible for their handling of your information per our instructions.

Other applications and third-party links. The Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our Site, we encourage you to read the privacy policies of every website you visit. Please remember that their use of your personal information will be governed by their privacy policies and terms.

Protecting your data

We only process personal data where we have a legal basis for doing so. We review the personal data we hold on a regular basis to ensure it is being lawfully processed.

Before transferring personal data to any third party (e.g. suppliers, partners and back office support), we establish that there is a legal reason for making the transfer, which may include your consent.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We have implemented measures and procedures that adequately protect the privacy of individuals and ensure that data protection is integral to all processing activities. This includes implementing measures which may include

- Data minimization (e.g. not keeping data for longer than is necessary);
- Pseudonymization;
- Anonymization;
- Cyber security; and
- A data security policy.

Your Rights

Accessing Your Information. We will provide you with the means to ensure that the personally identifiable information that PACT collects and maintains about you is correct and current. You may review this information by contacting us by sending an email to privacy@pactpharma.com.

A Record of Data Transfer. PACT will provide the right to request and receive, once a year and free of charge, information about third parties to whom we have disclosed certain types of personal information (if any) about you for our direct marketing purposes in the prior calendar year, and a description of the categories of personal information shared. To make such a request, please send an email to privacy@pactpharma.com and please include the phrase "Personal Information Privacy Request" in the subject line, the domain name of the website you are inquiring about, along with your name, address and email address. At our option, we may respond to such requests by providing instructions about how our users can exercise their options to prevent our disclosure of personal information to third parties for their direct marketing purposes.

California Online Privacy Protection Act. As required by the California Online Privacy Protection Act (“**California Act**”) and the California Business and Professions Code, this Privacy Statement identifies the categories of personally identifiable information (as that term is defined above and in the California Act) that we collect through our Site about individual consumers who use or visit our Site and the categories of third-party persons or entities with whom such personally identifiable information may be shared. See more about the California Act at <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

California Consumer Privacy Act of 2018 (CCPA). You have the right to request, twice a year and free of charge, certain information about parties to whom we have disclosed or sold your personal information in the prior calendar year and a description of the categories of personal information shared. Additionally, upon request, twice a year and free of charge, we shall provide to you any information relating to your personal information and our processing of your personal information in a concise, transparent, intelligible, and easily accessible form using clear and plain language. The information shall be provided in writing or by other means within 45 days of a written request. To make such a request, please send an email to privacy@pactpharma.com and please include the phrase "Personal Information Privacy Request" in the subject line, the domain name of the website you are inquiring about, along with your name, address and email address. You also may contact us via our website at <https://pactpharma.com/contact/>. You can also ask us to erase your personal data stored on our platform. If we receive a request to erase your data, we will ask you if you want your personal information to be removed entirely or if you want to be kept on a list of individuals who do not want to be contacted in the future (for a specified period or otherwise). We cannot keep a record of individuals whose personal information we have erased so you may be contacted again by us, should we come into possession of your personal information at a later date. PACT has collected, will collect and has disclosed the personal information described in the categories above during the last year for business purposes; however, PACT does not sell your personal information. If you exercise your rights under the CCPA, PACT will not discriminate against you.

Where we store and transfer your data

The Site is controlled by PACT from its offices in the United States.

PACT makes no representation that materials on this Site are appropriate or available for use in other locations, and access to them from territories where their contents are illegal is prohibited.

Those who choose to access this Site from other locations do so on their own initiative and are responsible for compliance with applicable local laws.

Contact

Have questions or concerns about our Site, Products or Privacy Statement? Contact us at privacy@pactpharma.com.