

Privacy Policy & Notice **(19/06/2019)**

This privacy policy (“Policy”) is issued on behalf of EUSA Pharma to let you know how companies within the EUSA Pharma Group collect and use your personal information. EUSA Pharma and the various entities of the EUSA Pharma Group (“EUSA Pharma”, “us”, or “we”) are committed to protecting your personal information.

This Policy does not apply to situations where we have notified you that an alternative privacy policy or notice applies to you.

About this Policy

This Policy applies to personal information which we receive from, or which relates to, our:

- customers;
- business partners and associates;
- business contacts;
- agreement counterparties;
- website users;
- clinical trials; and
- any others from whom we collect and use personal information.

Where the personal information relates to your clients, employees, workers or contractors, you should bring this notice to their attention.

This Policy explains the type of personal information we collect and use, why we use the information, who we may need to share the information with, how we protect your personal information and your rights under applicable data protection laws.

Information We Collect

We collect two types of information:

- **“personal information”**: information that, either alone or in combination with other identifiers, lets us know specifics about you or who you are. This includes your name, e-mail address, and telephone number. Personal information also includes your financial information and online identifiers, including your IP address.
- **“anonymized information”**: information that cannot identify you and has not been associated with you.

How and Why We Collect Your Personal Information

We collect your personal information directly in a variety of ways, including:

- when you engage us for the supply of our products and/or services;
- by telephone or in person;
- through email or letter correspondence;
- through the various websites operated by the entities in the EUSA Pharma Group, being: <https://eusapharma.com/>; <https://sylvant.com> ; <https://castlemansconnect.com>
- when we enter into an agreement for the exchange of products and/or services;
- in or as part of client surveys; and

We also collect your personal information indirectly as set out below in “Information Received from Third Parties.”

EUSA Pharma collects your personal information for a variety of purposes depending on the nature of your relationship with us. The purposes for which we collect your personal information include:

- to comply with our legal and regulatory obligations under applicable law;
- to perform any agreement and/or contract we have with you;
- to manage our customer and/or supplier relationships;
- to provide you with any products and/or services you request;
- to market our products and/or services effectively and to provide you with any information which you request;
- to contact you regarding special offers, promotions, new product and/or service offerings or other marketing-related communications which we believe may be of interest to you (in accordance with any privacy preferences which you have expressed to us);
- to communicate with you and respond to your inquiries, including responding to complaints and adverse events and attempting to resolve them;
- to improve the content, functionality and usability of our websites, including performing statistical analysis on usage of our websites;
- to customize our websites’ content, layout and product and service offerings;
- to develop, manage and improve our products and/or services (including conducting research and analysis) and to test new products and/or services;
- to validate any product warranties;
- to administer auditing, billing and reconciliation activities as well as supplier due diligence, credit, anti-fraud checks and other internal and payment-related functions;
- to create an account with us (either through our websites or otherwise), manage such accounts, and process and deliver any products and/or services which you order through such accounts;
- to administer and protect the security of our business and IT infrastructure, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data;
- as part of any proposed mergers and acquisitions involving the EUSA Pharma Group;
- for any other purpose identified in an applicable privacy notice, click-through agreement or other agreement between you and us.

If you fail to provide certain information when requested, we may not be able to provide our products and/or services to you.

Information Received from Third Parties

We receive personal information about you from third parties such as:

- [Companies that introduce you to us;]
- [Health care practitioners and/or health care providers;]
- [Insurers;]
- [Hospitals;]
- [Comparison websites;]
- [Social networks;]
- [Public information, such as information available for public registries;]
- [Agents working on our behalf;]
- [Market researchers;]
- [Marketing consultants;]
- [Clinical Research Organisations (“CROs”), which manage and carry out clinical trials on our behalf;]
- [Government and law enforcement agencies;]
- [Credit reference and/or reporting agencies;]

Information Received in connection with Clinical Trials

As part of developing and testing new products and/or services, EUSA Pharma sponsors certain clinical trials in the EU, the United States and other jurisdictions from time to time. EUSA Pharma does not conduct clinical trials directly ourselves and any data which we receive in connection with clinical trials which we sponsor is anonymized and/or aggregated and is not personally identifiable. In the unlikely event that EUSA Pharma receives the personal information (which if received would likely include sensitive personal information) of participants in the clinical trials, we comply with all applicable laws in respect of it.

Sharing of Information

We do not sell, trade or rent your personal information to others. We may share anonymized information, i.e. aggregate data, with third parties. Except as described herein, we will not provide any of your personal information to any third parties without your specific consent.

We share your personal information with the following categories of recipient:

- **With group companies and affiliates:** we share the information we collect about you with other member companies of the EUSA Pharma Group: EUSA Pharma UK Limited, EUSA Pharma US LLC, Investors and board members.
- **With professional advisors:** this includes advisors appointed by you or advisors appointed by us, for example, legal advisors.

- **With our service providers:** third party banks, administrative and IT services and other service providers. All our third party service providers are required to take appropriate security measures to protect your personal information.
- **With our sub-contractors:** such as our couriers, import/export agents, shippers, service sub-contractors, payment processors and other sub-contractors.
- **With government bodies or our regulators in the jurisdictions in which we operate:** where we are required to do so by law or to assist with their investigations or initiatives.
- **With police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.
- **With credit reference agencies.**
- **With any party approved by you.**

Retention of Information

Your personal information will only be kept for as long as we reasonably consider necessary for achieving the purposes set out in this Policy or for as long as we are legally required to keep it.

When assessing the data retention period, we take into account the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the data, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Security of Information

We have reasonable and appropriate security measures in place to protect against the loss, misuse, and alteration of any personal information we receive about you. We maintain appropriate security standards to protect the personal information that we maintain.

For Users of EUSA Pharma' Group Websites

Cookies

We may obtain information, including personal information, about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your device. Cookies contain information that is transferred to your device, which helps us to improve our website and to deliver a better and more personalized service to you. Some of the cookies we use are essential for the website to operate.

If you register with us, or if you continue to use our site, you agree to our use of cookies.

You may block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser setting to block all cookies (including essential cookies) you may not be able to access all or parts of our websites. Unless you have adjusted your browser setting so that it will refuse cookies, our systems will issue cookies as soon as you visit our websites.

Third Party Websites

Except as otherwise provided in this Policy, this Policy only addresses the use and disclosure of information we collect from you. Other sites accessible through our websites have their own privacy policies and data collection, use, and disclosure practices. Please consult each site's privacy policy as we are not responsible for the policies or practices of those sites or any third parties.

Do Not Track Mechanisms

California law requires this Policy to address how we respond to any "Do-Not-Track ("DNT") signal" delivered by your browser. Because of the changing state of technology and indecision within the industry regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.

Privacy Rights in Other Jurisdictions

You may have rights in relation to your personal information under applicable data privacy laws in other jurisdictions. If you wish to exercise any such rights, please contact us using the contact information below.

Marketing

In relation to marketing communications, we may provide you with an "opt in" or "opt-out" mechanism depending on where in the world you are located. An "opt-in" mechanism will provide you the opportunity to positively indicate that you would like or do not object to our sending you such further communications and we will not send you any unless you have "opted-in". An "opt-out" mechanism will provide you the opportunity to indicate that you do not want us to send you such further communications, and if you "opt-out" we will not send you any.

Children's Privacy

We do not knowingly collect or use personal information from children under the age of [18]. If we determine that we have collected the information of an individual under this age, we will not use or maintain his or her personal information without parent or guardian consent. If we become aware that we have unknowingly collected personal information from a child under the age of [18], we will make reasonable efforts to delete such information from our records.

Accuracy of Information

We strive to keep our records accurate and will make appropriate corrections when you notify us. Please let us know if there is incorrect information in any statements or other communications that you receive from us. If you would like to correct or update your personal information, please contact us using the contact details set out below.

Effective Date and Changes to this Policy

The effective date of this Policy is posted above. We reserve the right to update or modify this Policy at any time by providing any notice required under applicable law and by providing you with the revised version in hardcopy, electronically or by otherwise making the revised version available on our websites.

Contact Us

If you have any questions about this Policy or if you would like to exercise any rights you may have in relation to your personal information, please contact us at: privacy@eusapharma.com.