

# U.S. Privacy Notice

*Effective June 2021.*

## Purpose & Applicability

This Website (“Site”) is owned and operated by Nobelpharma America, LLC (“NPA,” “Us,” “Our,” “We”), a United States affiliate of Nobelpharma Co., Ltd.

NPA is committed to the protection of personal information, and We recognize the importance of responsible privacy practices to the success of our business and service objectives. This Privacy Notice is aimed at providing visitors to our Site, users of our services and participants in our programs (“You,” “Your”) with information about our practices related to the collection, use, disclosure, protection, retention, and other processing of personal information, as well as to inform You about how to contact Us or exercise Your rights, where applicable, related to Your personal information that we may collect and process.

This Site and the programs and services referencing this Privacy Notice are controlled and operated by Us from the United States, are intended for residents of the United States, and are not intended to subject Us to the laws or jurisdiction of any state, country or territory other than that of the United States. Please be aware that any information You provide, or information collected about You through Your use of this Site or Our services, or participation in Our programs, is subject to protections under United States law, which may be less strict than the laws of Your home country. Your continued use of this Site or our services, or participation in our programs that reference this Privacy Notice, indicates that You understand and agree to the collection and processing of Your personal information as described herein.

The Site and any information You provide to Us through use of the Site may be stored, processed, transferred between, and accessed from other countries that may not guarantee the same level of protection of personal information as the one in which You reside. However, We will handle Your personal information in accordance with this Privacy Notice.

Some states have state specific rights for their residents.

## Personal Information We Collect

We collect personal information You chose to provide, e.g., through this Site, via e-mail, or through other means such as registrations, applications and surveys, and in connections with Your inquiries and purchases, to provide You with access to specific content, features, interactive services, or other functionality on our Site, to participate in programs We offer, or to contact Us directly. For example, You may choose to provide Us personal information in connection with Your participation in a program We offer, such as a patient assistance program, scientific meeting, promotion, or survey.

In addition, We may gather information about You automatically through Your use of the Site, such as Your IP address, and how You navigate our Site. See also, the Section below on Cookies.

If You submit any personal information relating to other people to Us, You represent that You have the authority to do so and to permit Us to use the information in accordance with this Privacy Policy.

Personal information We may collect may include, but is not limited to, the following:

#### [Contact, Professional and Other Personal Information](#)

In some cases, we may request information about you, such as:

- Contact information, such as Your name, postal address, e-mail address, telephone number
- Professional, government issued ID, information about your education, work history, medical specialty, etc.
- Insurance or financial information
- Other information as necessary to your use of our services, participation in our programs or to fulfill your requests

#### [Health Related Information](#)

This information may include details regarding:

- Health, diagnoses and medications
- Family medical history, etc.

This information may relate to identifiable individuals or non-identifiable individuals, and we process this information only as permitted by and in compliance with applicable laws, and only for permissible purposes

#### [Digital Information & Online Identifiers](#)

This may include information such as:

- IP Address
- Geographic location
- Our websites You have accessed, and similar information

We use this information to secure our websites, networks, systems, and other assets.

Where permitted by law, we may collect this information automatically, for our legitimate business interests, such as improving our Sites, services or programs.

### [How We Use Personal Information](#)

In addition to the examples discussed above, NPA may process and use Your personal information, in accordance with applicable law, for purposes including, but not limited to, the following:

- As necessary for the performance of a contract, or at Your request, to provide You with information, services, etc.

- When required by applicable law, such as to report adverse events related to our products, or to comply with transparency reporting obligations related to our interactions with Healthcare Professionals.
- When necessary to the protection of individual(s) vital interests or to protect the personal safety of users of Our products, Our services, the website or the public.
- When we have obtained your consent, where required by applicable law.
- As specifically directed by You.
- When pursuing our legitimate business interests, such as:
  - Research and Development activities
  - Managing Patient Support and Engagement activities
  - Healthcare Professional / Customer Relationship Management
  - Marketing, Sales and other Commercial activities
  - Partnerships and Business Collaboration activities
  - Personnel Management & Business Operations
  - Purchasing and Partnership Arrangements
  - Business Transactions, Mergers & Acquisitions, etc.

From time to time, We may use Your personal information with information obtained from other sources, such as public databases, social media platforms, and other third parties. For example, We may use such third party information to confirm contact or financial information, to verify licensure of healthcare professionals, or to better understand Your interests by associating demographic information with the information You have provided.

Where legally permissible, We may also combine personal information collected from You, through this Site and others or programs with our offline records and information obtained from public or third party sources. We use this consolidated information to gain user insights, monitor traffic patterns to the Site, affiliated website, and particular pages, as well as Site usage, in order to help Us improve this Site and others, enhance our marketing activities, and to facilitate other legitimate business functions.

## How We Share Personal Information

NPA does not sell, rent or lease Your personal information.

We may share personal information with [Nobelpharma Co., Ltd., its affiliates, subsidiaries](#), business partners, and successors, and with various types of third-party service providers that perform certain functions on our behalf, partner with Us, or support our business operations. For example, We may engage, without limitation:

- Technical support services

- Research & Data Analytics support services
- Marketing, Commercial & Communication support services
- Insurers & Professional Advisors, and
- Services related to Human Resource operations and management.

In those cases where personal information is shared with or disclosed to third parties, NPA takes commercially reasonable steps to require such third parties to implement and maintain appropriate measures to protect personal information, and to use or disclose the personal information only for purposes of providing Us with their applicable services or as required by applicable law.

We may also share personal information if We are required to do so by applicable law, in response to a valid legal request, as necessary to exercise or defend Our legal rights or interests, or as necessary to protect and defend the rights of the users of the website.

## How We Protect Personal Information

Although we cannot guarantee the security of activities, transmissions or communications conducted via the Internet, we have implemented commercially reasonable physical, technical and administrative security measures to protect personal information collected and used as described in this Privacy Notice. However, no such measure is ever 100% effective, and We cannot guarantee Your personal information will be secure from theft, loss, or unauthorized access or use.

## Personal Information of Children

This Site is not directed at children under the age of 13. We do not knowingly collect personal information from visitors to this Site or participants in our programs or services in this age group. We encourage parents to speak with their children about the use of the Internet and the information they disclose to or make available through Websites. Anyone under 13 years old must seek a parent or guardian's permission prior to using our Site or disclosing any personal information to NPA.

## Cookies & Tracking Technologies

### Cookies

A cookie is a small data file containing information about a user that a website can place on Your device, computer, or hard drive.

Cookies are used for a variety of purposes, including to help Us make Your experience and interactions with our websites more efficient and easier for You by remembering things like Your language, display and other setting preferences.

We may place cookies (or other similar technologies) in a web browser (e.g., Internet Explorer, Chrome, etc.) file of Your computer or device when You visit the Site. In

addition, We or independent, third parties with whom We have a relationship may also deliver cookies to Your web browser.

We may also utilize third party cookies and similar technologies, which are created by domains that are not on the website (or domain) You are visiting, such as web analytic services and advertising network services (e.g., [Google Analytics](#)). These technologies collect and analyze information about use of the Site and report on activities and trends. These services may also collect information regarding the use of other websites, apps and online resources. By using these services, We can gain helpful insights about how our websites are used and how We can improve Your experiences and interactions during Your visits.

You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

You can change Your browser settings to manage cookies based on Your preferences, such as by modifying Your browser settings, limiting or rejecting cookies, and/or deleting or declining cookies. However, if You choose to do so, You may not be able to interact with our Site in the same manner and the Site's functionality may be diminished or disabled.

For more information about cookies and how to manage, block and delete them, please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Do-Not-Track Signals

This Site does not recognize or respond to do-not-track signals, even when You have enabled do-not-track mechanisms on Your Internet browser. This means that under certain circumstances, We may be able to identify You when You visit this Site. For example, We may be able to link information about You related to Your previous visits to our Site and affiliated websites and social media websites, depending on whether our website cookies from earlier visits are still stored on Your computer.

For more information about do not track signals, visit: [www.allaboutdnt.com](http://www.allaboutdnt.com).

### Other Sites

This Site may contain links to other websites. NPA does not endorse, nor are We responsible for the operations or management of those other websites. Please be advised that this Privacy Notice does not apply to Your use of those other websites.

We encourage You to review other sites' applicable privacy notices, policies, terms of use, etc., to understand how they collect, use and protect personal information.

## Social Media

This Site may use social plugins (e.g., Facebook “Like” function) to enable You to easily share information with others. When You visit our Site, the operator of the social plugin may be able to place a cookie or similar technology on Your computer, enabling that operator to recognize individuals who have previously visited our Site. If You have previously logged into the associated social media website (e.g., Facebook) before browsing on our Site, the social plugin allows that social media website to receive information about Your visit to particular pages on our Site.

The social plugin may collect this information from visitors who have logged into social networks, regardless of whether they specifically interact with the plugin on our Site (e.g., by clicking “Like” or “Share”). The social plugin may also allow the social media website to share information about Your activities on our websites with other users of the respective social media website.

For further details about the information shared via a particular social media plugin, You should refer to information provided by the respective social media Site and its applicable privacy notice, policy, statement, terms of use, etc.

## Retention Periods

We retain personal information only for as long as needed to fulfill the purposes for which it was collected and in accordance with Our policies and with applicable laws.

## Your Rights & Choices

You may contact Us at any time (See How To Contact Us, below) to request information on how:

- We process Your personal information
- To access to the personal information We hold about You
- To correct any mistakes about Your personal information or to request deletion of the same
- To withdraw Your consent to certain types of processing of Your personal information
- To opt-out of services that You may have previously signed up for or for which You have registered

NPA is committed to respecting Your choices about the use of Your personal information, and We will take reasonable steps to respond to and honor such requests. However, if such a request places NPA or its affiliates in breach of its obligations under applicable laws, regulations or codes of practice, then NPA may not be able to comply with Your request, but You may still be able to request that We block the use of Your personal information for further processing. In the event We are unable or prohibited by law from complying with Your request, We will inform You within the time required under applicable law. Please note that We may need to retain certain personal

information, subject to applicable law, for recordkeeping purposes and/or to complete any transactions that You began prior to requesting a change or deletion

To respond to Your request in an appropriate and timely manner, We may ask for additional information about You to verify Your identity and to understand the scope and nature of Your interactions with NPA. NPA will not discriminate against You for exercising Your rights relating to Your personal information, and We will only use any additional information We may request for the limited purposes of identity verification.

## [How to Contact Us](#)

By using this website, You signify Your assent to the Privacy Notice. If You have questions about this Privacy Notice or our privacy practices, or if You wish to submit a request to exercise Your rights regarding Your personal information, please visit: [Contact Us](#)

*Additionally, You may write to Us at:*

4520 East-West Highway, Suite 400  
Bethesda, MD 20814

## [Updates & Changes to Our Privacy Notice](#)

NPA reserves the right to update or make changes to this Privacy Notice from time to time, at our discretion. This Privacy Notice was last updated as of the effective date listed above. If the Privacy Notice changes in a way that significantly affects how We handle personal information, We will not use the personal information We previously gathered in the manner described in the updated Privacy Notice without providing notice and/or obtaining Your consent, as appropriate. Minor changes to the policy may occur that will not significantly affect our use of personal information without notice or consent. We encourage You to visit this page periodically and to review our most current Privacy Notice and applicable effective date.