

## Privacy Policy

LEO PHARMA INC.

**Effective Date: October 22, 2018**

LEO PHARMA INC. (“LEO,” “we,” “us,” or “our”) provide this privacy policy (“Privacy Policy”) because we know that you care about how your information is collected, used, shared and retained. This Privacy Policy applies to information collected when you visit any LEO PHARMA INC. website (collectively, the “Websites”), or use the services that we make available via the Websites from time to time (the “Services”). By visiting the Websites and/or using the Services, you are agreeing to the terms of this Privacy Policy and the Legal Disclaimer and Terms of Use. This Privacy Policy also applies to information that we receive through third party websites or services when it is stated that such information will be subject to this Privacy Policy. Otherwise, this Privacy Policy does not apply to information collected from any third party (including our affiliates and subsidiaries) or by us offline or through other means. Capitalized terms not defined in this Privacy Policy have the meaning ascribed to them in the Legal Disclaimer and Terms of Use.

### **The Information We Collect and/or Receive**

In the course of operating the Websites and providing the Services, LEO collects and/or receives the following types of information:

#### **Contact Information**

When you contact us through the “Contact Us” page, you will be asked to provide certain information, which may include first name, last name, address, phone number and email address (“Contact Information”). We may also receive your Contact Information via third party websites and services that state that such information will be subject to this Privacy Policy.

#### **Job Application Information**

If you would like to apply for any career opportunities at LEO, you will need certain information, which may include your name, e-mail address, phone number, cover letter, and resume (collectively, the “Job Application Information”). Such Job Application Information will be collected and processed by our third party vendor pursuant to the terms and conditions of their privacy policies and terms of use and shared with LEO.

#### **Grant Request Information**

If you would like to submit a grant request and/or inquire about our grant request requirements, you will need to provide certain information, which may include, your activity name, date, and location, brief description of activity, tax id#, contact information, speaker name(s), agenda, budget breakdown, accreditation and similar information that is necessary to consider your grant request (“Grant Request Information”).

### **Other Information We Collect Through Automatic Data Collection Technologies**

In addition to the Contact Information, Job Application Information and the Grant Request Information, we may collect and/or receive additional information (the “Other Information”). Such Other Information may include:

- a. From your activity. In an ongoing effort to improve the Websites and our Services, we automatically collect certain information when you visit the Websites and/or use the Services. Such information includes without limitation, your IP address, Internet service provider, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Websites you visit, number of links you click while on the Websites, search terms, operating system, website traffic and related statistics, keywords, key word searches and/or other data concerning your use of the Websites and/or the Services.
- b. From JavaScript Tags or cookies. JavaScript tags trigger a sequence of events that includes viewing a first-party cookie (or setting that cookie if it does not already exist). We may use JavaScript tags to help us tailor and optimize our Websites and provide you relevant LEO advertisements outside of our Websites.
- c. From Web beacons. Web beacons, also known as “clear gif” technology, are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web site users. Unlike cookies, which can be stored on a user’s computer hard drive, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence. We may use web beacons to help us manage information on the Websites by tracking what information is effective.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). The information we collect automatically is statistical data and may not include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties.

### **How We Use Your Information**

You authorize us to use your Job Application Information to determine your eligibility for the job opportunity and to contact you in connection with your job application.

You authorize us to use your Grant Request Information to determine your eligibility to receive a grant from LEO and to contact you in connection with such determination.

You authorize us to use your Contact Information and Other Information to fulfill the purpose for which you provide it; to administer access to the Websites and the Services; to improve the Websites and the Services; to provide the Services and respond to other inquiries; to provide support; and for LEO, its successors, affiliated companies, and/or agents to communicate with you via email, newsletter, and/or regular mail regarding our products, Services and programs, and/or disease awareness. We may also use your Contact Information to carry out surveys, studies, evaluations, and to supply you with goods or services that you have ordered on the Websites. We may use your Contact Information and automatically collected Other Information to personalize your experience on the Websites, including serving advertisements regarding our

products and services, and disease awareness, tailored to your interests. It also helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to: estimate our audience size and usage patterns; store information about your preferences and/or recognize you when you return to our Website.

You may choose not to submit your personal information at any time, but that decision may prevent you from accessing and/or using certain of the Services. We may block users located in certain countries from using the Websites. We may retain and use your Information for as long as is required to fulfill our business objectives.

### **Aggregated Personal Information**

We may analyze your information in aggregate form which does not identify you personally. We may share this aggregate data with our parent, affiliates, agents, advertisers, manufacturers and business partners. We may also disclose aggregated user statistics in order to describe our services to current and prospective business partners and to other third parties for other lawful purposes.

### **Sharing Your Information.**

There are certain circumstances where we may share your Contact Information, Job Application Information, Grant Request Information, and Other Information (collectively, the “Information”) with third parties without notice to you, including:

- **Agents, Consultants and Related Third Parties.** We, like many businesses, sometimes hire other companies to perform certain business-related functions. When we employ another company or third party to perform a function of this nature, we only provide them with the information that they need to perform their specific function. We may also share your Information with our parent company, affiliates, or other companies under common control with us.
- **Legal Requirements.** We may disclose your Information if required to do so by law or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect and defend our rights or property, (c) protect the personal safety of users of the Websites or the public, or (d) protect against legal liability.
- **Business Transfers.** As we develop our business, we might share your Information with third party service providers, business partners or other third parties. We may also sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, your Information may be part of the transferred assets. If we transfer our business or assets to another entity, we will require it to honor the terms of this Privacy Policy, if applicable. We will not otherwise sell your personal information to third parties without first providing you with notice and choice to opt out.

### **External Websites**

The Websites and the Services may contain links to third party websites. LEO has no control over the privacy practices or the content of those third party websites. As such, we are not responsible for the content or the privacy policies of those third party websites. You should check the applicable third party privacy policy and terms of use when visiting any such third party websites, and before providing any personal information to such third party websites.

## **Security**

We take commercially reasonable steps to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Secured socket layer (“SSL”) technology is used for processing payment transactions with our third party service providers. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Websites may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. Therefore, you acknowledge and agree that we assume no liability regarding the theft, loss, alteration or misuse of personal or other information or content, including, without limitation, such information that has been provided to third parties or other users, or with regards to the failure of a third party to abide by the agreement between us and such third party.

## **Accessing and Modifying Information**

Upon email request to [us.privacy@leo-pharma.com](mailto:us.privacy@leo-pharma.com), we will grant you reasonable access to personal information that we and our agents have about you for the purpose of reviewing and/or requesting changes. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

## **Website Communications**

If you register on the Websites, we may send you certain notifications, advertisements, promotions, and other information. We may also send you any legally required notifications and certain notifications, including but not limited to, service related notices or notices regarding a change to any of our policies. For example, we may send you a notice regarding server problems or scheduled maintenance to the Websites. In order to opt-out of receiving these notices, you may need to deactivate your account. You can opt-out of receiving certain communications from LEO, its successors, affiliated companies and/or its agents, including emails, mail, SMS, and phone calls relating to our products, Services, and programs, and/or disease awareness information. We may provide various ways to opt-out, which may include opt-out boxes on materials sent by regular mail, and unsubscribe functions in emails. You cannot, however, opt-out of receiving transactional communications from LEO related to your account.

## **California Privacy Rights**

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you wish to submit a request pursuant to Section 1798.83, please contact LEO via email at [us.privacy@leo-pharma.com](mailto:us.privacy@leo-pharma.com).

In addition, LEO does not monitor, recognize or honor any opt-out or do not track mechanisms including general web browser, “Do Not Track” settings and/or signals.

### **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Please be aware that, to the extent permitted by applicable law, our use of your information is governed by the Privacy Policy in effect at the time we collect the information. If you visit the Websites and/or use the Services after a change to this Privacy Policy is posted on the Websites, you will be bound by such change. Please refer back to this Privacy Policy on a regular basis.

### **Important Notices to Non-U.S. Residents**

The Websites and the Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Websites, and/or the Services, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States.

### **Children's Privacy**

As we are committed to protecting the privacy of children, we do not collect personal information from anyone who is, to our knowledge, under the age of 13. If you are under the age of 13, please do not provide any personal information through the Websites, and/or the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Privacy Policy by instructing their children to never provide any personal information on the Websites, and/or the Services without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to LEO through the Websites, and/or the Services, please contact us as described in the "How to Contact Us" section, and we will endeavor to delete that information from our databases.

### **Questions**

If you have any questions regarding this Privacy Policy, please contact us as described in the "How to Contact Us" section. We will investigate your question, respond to your inquiry, and attempt to resolve any concerns regarding your privacy question.

### **How to Contact Us**

You can contact us in one of the following ways:

Email: [us.privacy@leo-pharma.com](mailto:us.privacy@leo-pharma.com) \_\_\_\_\_

Or write to us at:

LEO Pharma Inc.  
7 Giralda Farms – 2<sup>nd</sup> Floor  
Madison, NJ 07940  
USA

