



PRIVACY & COOKIES POLICY

Definitions

For the purposes of this Policy:

“**Affiliate**” means any entity that, directly or indirectly, Controls or is under common Control with another entity or in which such other entity has Control, and the term “**Control**” means the possession, directly or indirectly, of the power to affirmatively direct, or affirmatively cause the direction of, the management and policies of an entity, whether through the ownership of voting securities, by contract, or otherwise;

“**EEA**” means the European Economic Area;

“**Envision Pharma Group**” means Envision Pharma Limited and its Affiliates (including Envision Pharma, Inc.);

“**Personal Information**” means any information or set of information that identifies or is used by or on behalf of Envision Pharma Group to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information;

“**Sensitive Personal Information**” means Personal Information that reveals race, ethnic origin, political or religious beliefs, or personal information regarding health conditions;

“**Website**” means www.EnvisionPharmaGroup.com and websites hosted by any member of Envision Pharma Group for clients using its software products;

“**You**” or “**your**” means an individual who uses the Website.

Personal Information

This Policy is provided to all individual users who use the Website and explains how Envision Pharma Group handles Personal Information (including its adherence to the US Safe Harbor principles).

Personal Information may be submitted to and/or collected by Envision Pharma Group via the Website when you request information from Envision Pharma Group or engage its services or assistance, or as a result of your relationship with one or more of its clients. For example, such information can be collected when an individual submits his or her name and/or address.

By using any of Envision Pharma Group’s services including the Website and by providing it with any Personal Information, you are consenting to the use of your Personal Information as set out in this Policy.



Please do not send any Personal Information if you do not want your Personal Information to be used in this way.

A number of facilities on the Website may invite you to provide Envision Pharma Group with Personal Information, for example, regarding a vacancy application, regarding a Helpdesk facility or regarding any email queries or contact facility.

Envision Pharma Group may use your Personal information for the following:

To provide and improve the Website;

To provide and improve services to you and to Envision Pharma Group's clients;

To compile anonymous statistics, for example, website usage statistics;

To manage its relationship with you and its clients.

To fulfil legal obligations.

For the purposes of recruitment.

For other legitimate business purposes.

Any Personal Information provided by you will be used only by Envision Pharma Group for the purposes of fulfilling a specific request for which it was given. Envision Pharma Group will not share your Personal Information with any third party, except as stated below, without your consent.

Under applicable data protection legislation Envision Pharma Group must ensure that your Personal Information is accurate and up to date. Therefore, please advise Envision Pharma Group of any changes to your Personal Information.

You are entitled to request details of the Personal Information that Envision Pharma Group holds about you and to have it rectified or deleted as required by applicable data protection legislation. For more information please send an email to: privacy@envisionpharma.com.

Envision Pharma Group may release your Personal Information to third parties without your consent: (1) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena, or court order; or (2) in special cases, such as in response to a physical threat, to protect property, or defend or assert legal rights. In the event that Envision Pharma Group is legally compelled to disclose your Personal Information to a third party, Envision Pharma Group will attempt to notify you unless doing so would violate the law or court order.

In addition, Envision Pharma Group is in the business of providing hosted software solutions to its clients. If you provide Personal Information via one of Envision Pharma Group's software applications branded for a client, you are implicitly providing that Personal Information to that client as well and should ensure you understand how your Personal Information may be used by them through their privacy policy which may be published on the branded site, or available on their corporate website.

Furthermore, Envision Pharma Group operations and maintenance contractors sometimes have limited access to Personal Information in the course of providing products or services to Envision Pharma Group.



Access to your Personal Information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function for Envision Pharma Group. Envision Pharma Group requires its operations and maintenance contractors to: (1) protect the privacy of any individual user's Personal Information consistent with this Policy, and (2) not use or disclose Personal Information for any purpose other than providing Envision Pharma Group with products and services.

Any Personal Information that you provide to Envision Pharma Group may be shared with and processed by any member of Envision Pharma Group and/or certain of their operations and maintenance contractors. This may entail a transfer of your Personal Information from a location within the EEA to outside the EEA, or from outside the EEA to a location within the EEA. The level of information protection in countries outside the EEA may be less than that offered within the EEA, however we have procedures in place to ensure the protection of your information.

Envision Pharma Group will take reasonable precautions to protect Personal Information in its possession from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

US–EU & US–Swiss Safe Harbor

Envision Pharma Group adheres to the Safe Harbor Principles agreed to between the United States Department of Commerce on the one hand, and the European Commission and the Federal Data Protection and Information Commissioner of Switzerland on the other, in connection with the transfer of Personal Information between member states of the European Economic Area and the United States, and Switzerland and the United States.

Safe Harbor Privacy Policy

Envision Pharma Group self-certifies compliance with:



Envision Pharma Group respects individual privacy and is committed to maintaining the privacy and security of the Personal Information of its clients, employees, business partners, and others with whom we interact. This Safe Harbor Privacy Policy sets forth the privacy principles that Envision Pharma Group follows with respect to transfers of Personal Information between member states of the EEA and the United States, and Switzerland and the United States.

Scope

This Safe Harbor Privacy Policy applies to all Personal Information received by Envision Pharma Group in the United States from the EEA and/or Switzerland in any format including electronic or hard copy.

Privacy principles



The privacy principles in this Safe Harbor Privacy Policy are based on the Safe Harbor Principles.

Notice

When Envision Pharma Group directly collects Personal Information from individuals in the EEA, it will (1) disclose the purpose for collecting and using the Personal Information, (2) describe the types of entities to whom disclosures may be made, (3) describe the choices and means, if any, offered by Envision Pharma Group to individuals to limit the use and disclosure of such Personal Information, and (4) provide contact information to individuals where their inquiries or complaints can be addressed. Notice will be provided at the time when individuals are first asked to provide Personal Information or as soon as practicable.

Choice

Envision Pharma Group will offer individuals the opportunity to opt-out of further uses or disclosures when their Personal Information will be disclosed to a non-agent third party or in connection with a purpose other than the purposes for which it was originally collected or authorized by the individual. If the use or disclosure involves Sensitive Personal Information, Envision Pharma Group affords individuals the opportunity to explicitly opt-in to such use or disclosure when the Sensitive Personal Information would be disclosed to a non-agent third party or in connection with a purpose other than the purposes for which it was originally collected or authorized by the individual.

Data integrity

Envision Pharma Group will use Personal Information in its possession only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Envision Pharma Group will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete, and current.

Transfers to agents

Envision Pharma Group will obtain adequate assurances from its agents and other business partners that they will safeguard Personal Information in a manner consistent with this Safe Harbor Privacy Policy.

Access and correction

Envision Pharma Group will grant individuals reasonable access to Personal Information that it holds about them, unless such access would compromise the purpose for which it was collected. Envision Pharma Group will take reasonable steps to assist individuals with correcting, amending, or deleting Personal Information that is determined to be inaccurate or incomplete. The foregoing shall not apply where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.



Security

Envision Pharma Group will take reasonable precautions to protect Personal Information in its possession from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

Enforcement

Envision Pharma Group will verify its adherence to this Safe Harbor Privacy Policy by conducting routine compliance audits of its relevant privacy practices. Envision Pharma Group will take appropriate disciplinary action, consistent with applicable laws, against any Envision Pharma Group employee who willfully violates or seeks to circumvent this Safe Harbor Privacy Policy or who takes an action to compromise the integrity or safety of Personal Information.

Dispute resolution

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to Envision Pharma Group at the address given below. Envision Pharma Group will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Safe Harbor Privacy Policy. For complaints that cannot be resolved between Envision Pharma Group and the complainant, Envision Pharma Group has agreed to participate in the dispute resolution procedures of the American Arbitration Association (AAA), ICDR/AAA Safe Harbor Program for non-human resources data; EU Data Protection Authorities (DPAs) and Swiss Federal Data Protection and Information Commissioner (FDPIC) for HR data only.

Limitation on application of principles

Adherence by Envision Pharma Group to these Safe Harbor Principles may be limited to the extent (1) required to respond to a legal or ethical obligation, or (2) expressly permitted by an applicable law, rule or regulation, such as processing data specifically requested by government agencies for the purpose of medical safety.

Contact information

Questions or comments regarding this Safe Harbor Privacy Policy should be submitted to Envision Pharma Group by mail or email as follows:

Envision Pharma Group
FAO: General Counsel
Southport Crossing
3530 Post Road
Southport, CT 06890
USA

privacy@envisionpharma.com



Changes to this Safe Harbor Privacy Policy

This Safe Harbor Privacy Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. Envision Pharma Group will undertake annual self-certification in compliance with the Safe Harbor requirements for continued registration.

Cookies Statement

Envision Pharma Group can also collect information about visits to the Website without you actively submitting information through various automated digital means, such as cookies and internet tags. Although the information collected by such automated digital means does not directly identify specific individuals, internet web browsers automatically transmit information to the Website regarding the software your computer is operating, such as IP Address and browser version. Information collected by these technologies cannot be used to identify you without additional identifiable information.

Cookies are small text files that are placed on your device by websites that you visit. They are used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

The Website may use both strictly necessary cookies and performance cookies. Strictly necessary cookies enable you to move from page to page within the Website and to use its features. These cookies are deleted when you close your browser. Performance cookies allow us to collect information, including the number of visitors to the Website; where they have come to the Website from; whether they have consented to the use of cookies; their locale; the pages they visit; and the length of time they have spent on the Website. We may use services such as Google Analytics or Leadlander, both of which use cookies to collect such information. We would use this information to compile statistics and to help us to improve the Website; however, these cookies do not in themselves collect information that identifies an individual.

You have the ability to accept or disable cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to disable cookies if you prefer. If you decide to disable cookies, you may not be able to access some areas of the Website.

By continuing to use the Website without changing your browser settings to disable cookies, you consent to Envision Pharma Group's use of cookies as described above.

You can find more information about cookies at www.allaboutcookies.org.