

## PRIVACY POLICY

It is very important to Promius® Pharma to protect the personal information of visitors to our site. Below you'll find information about our commitment to ensuring the privacy of your personal information (such as your full name, address, email address, telephone number, and/or any other identifying information); how we use that information; how we protect it; and the choices you may make with respect your personal information. Wherever Promius Pharma (Company) is mentioned, we are referring to Company, our affiliates, and other companies and individuals that Company or our affiliates may collaborate with regarding our products and services (collectively, "Service Providers"). Your visit to this site is subject to this Privacy Policy and to our Legal Statement.

Please read the following carefully. If you have any questions or concerns, please send us an email to [info@NoTime4Migraines.com](mailto:info@NoTime4Migraines.com).

### **Acceptance of Company's site Privacy Policy terms and conditions**

By using this site, you signify that you have read and agree to the terms and conditions of this Privacy Policy and our Legal Statement. If you do not agree to these terms and conditions, please do not use the site.

### **Gathering and use of information**

We collect personal information you choose to provide, e.g., through enrollments or registrations for services that require subscription (such as email newsletters and requests for membership information), applications, surveys or content submissions (such as community forum postings, voting, or comments), and in connection with any inquiries you may make to Company. We may also passively gather information (that is, gathered without you actively having to provide the information) about you through your use of this site, such as your IP address and how you navigate our site by using cookies, through your browser, your IP Address, tracking pixels and other technologies including mobile devices (collectively, "Tools"). We and our partners may gather and use this information to help us better understand, customize and improve user experience with this site, our services and offerings, as well as to manage our advertising. If you have provided us with personal information e.g., by registering on our site or requesting certain materials, we may associate the personal information you provided with information gathered through the Tools. These Tools allow us to customize your experience while using our site, enabling us to deliver site content and functionality based upon your preferences and interests. You can control whether or not your browser will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser by adjusting the settings in your web browser. If your browser is set to reject cookies, websites that are cookie-enabled (such as this site) may not recognize you when you return to the website, and some website functionality may be lost. The help section of your browser may tell you how to prevent your browser from accepting cookies.

Company will never willfully disclose any of your personal information to any third party without your permission. From time to time, Company may use or supplement the personal information we have about you with information obtained from third parties. For example, we may use such third party information to confirm your personal information such as 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.

### **How We Use or Disclose Personal Information Collected Through this Site**

Company may use your personal information in the following ways:

- To Provide You with Service:

We may use your personal information to provide any products or services you request or to respond to your inquiries. In the event you respond to one of our marketing promotions or service offerings, we will provide the specific materials you request and we may also provide communications about related products, brands, health topics and disease states. We may also use your information to deliver the content and services we believe you will find the most relevant based on your activity on our site. For example, a user who has been identified as a healthcare professional who treats psoriasis

may receive information relating to new psoriasis therapies. In addition, we may use personal identifiers to recognize you when you arrive to our site via external links, e.g., such as a link appearing in an email you may have received from Company or a link appearing on a third party site. Company will also use your information to provide you with customer service and support, for internal marketing and promotional purposes, or, on occasion, when mailing lists are made available to other organizations.

- To Authorize Your Ability to Access / Use Certain Products, Services and Information:

Some of the products, services and information Company offers may only be suitable for, or accessible to, individuals meeting certain eligibility requirements or other criteria. In such cases, we may verify that you meet such criteria. For example, certain information relating to our products may only be intended for and accessible to licensed healthcare professionals and we may use information we collect directly from you and from outside sources to validate whether or not you have the licensure and eligibility to view such information.

- To Assist Third Parties Based on Your Request:

Our site offers various Tools and functions such as social media widgets/tools/buttons. Some of these Tools and functions are provided by Company while others may be provided by outside third parties. For example, our site may provide you with the ability to forward and share certain content from our site with a friend, relative, or other third party. If you choose to use this sharing feature on Company's site in order to refer someone to our site content, products or services, we will use your information and that of the individual you are sharing with to send the content or link you request, but we will not access, store or use the information relating to the individual you wish to share with, other than in connection with your specific request.

If you utilize any of our site's third party sharing components, including any email applications, social media widgets/tools/buttons such as Facebook, Apple, Twitter, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, such use will at all times, be subject to the third party's privacy policy and terms. Because Company does not have any control over third-party websites/content/services, Company recommends that you read the privacy policies and terms published or issued by these third party carefully.

If you are logged into the social media Web site (e.g., Facebook, Twitter) while browsing on our Web site, the social media plug-in allows that social media Web site to receive information that you have visited our Web site. The social media plug-in also allows the social media Web site to share information about your activities on our Web site with other users of their social media Web site.

- To Advise You of Certain Program Terms and Conditions:

On occasion, Company may give notice of certain programs, events, clinical trials, activities or promotions via our site ("Company Programs") that have specific terms, privacy notices and/or consent forms that explain how any personal information you provide will be processed in connection with that Company Program. Company will honor those Company Program terms with respect to your personal information. Some of these Company Programs may involve sharing information with a third party and if so, Company will provide you with notice of this use. You may be offered the opportunity to agree to or opt-out of the sharing of your information with such third party. But, in some instances, it may be necessary to agree to Company's sharing of your personal information with a third party in order to participate in the specific Company Program. If you consent/do not opt-out, we will share your information with the third party; and the personal information you provide may be used by the third party in accordance with the Company Program terms that you have consented to, or in accordance with such other terms as specified in the Company Program terms. We strongly suggest you review both the Company Program terms and any applicable third party policies/ terms that may apply before agreeing to participate in a Company Program.

- To Identify Persons Who May Benefit From or Recommend our Products and Services:

From time to time, Company may use your personal information to seek out individuals, e.g., patients, healthcare professionals, who have benefitted from or wish to recommend our products and services to others.

- To Improve our Products and Services and Protect Patients and Consumers:

Company may utilize the information you provide to better understand, meet and exceed patients', providers', and our customers' expectations. We will use the information to determine how our products and services effect you and those you care for, to track and address safety concerns and to further develop and improve our products and services. For example, you may be invited to participate in a survey about our products or services; healthcare professionals may be invited to participate in various programs or panels of experts. In addition, we will use the information you provide to comply with our regulatory monitoring and reporting obligations, including those related to adverse events, product complaints and patient safety.

- Product Reports:

If you contact Company regarding your experience in using one of our products, we may use the information that you provide in submitting reports to the US Food and Drug Administration and as otherwise required of us by law. We also may use the information to contact the prescribing physician to follow up regarding an unexpected event involving the use of our product.

- In Aggregated or De-identified Form:

Company may de-identify and/or aggregate data and information about visitors to our site for various business purposes including analyzing and enhancing our products and services and for development and improvement activities.

### **How We Share Your Personal Information:**

Company may share your personal information as follows:

- In Connection with Business Transfers:

If we sell or transfer a business unit (such as a subsidiary) to another company, we will share your personal information with that company and require such company to use and protect your personal information in accordance with all the terms of this Privacy Policy.

- With Service Providers and Business Partners:

Company may collaborate with Service Providers and other business partners. Examples of such Service Providers include data analysis firms, credit card processing companies, customer service and support providers, email and SMS vendors, web hosting and development companies and fulfillment companies. Service Providers also include other companies deemed business partners to Company in relation to products that are jointly developed and/or marketed by Company and such business partner. Some Service Providers may collect information on our behalf on this site. These third parties may be provided with access to personal information as necessary in order to perform their functions, but they may not use such information other than on Company's behalf and subject to contracts that protect the confidentiality of the information. In addition, as noted above, we may share information with third parties in accordance with Company Program terms unless you opt-out or do not consent to such use.

- To Comply with Laws:

Company cooperates with government, law enforcement officials and private parties in order to enforce and comply with the law. We reserve the right, in our sole discretion, to disclose your personal information as required by law, when we believe disclosure is necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas, judicial proceeding, court order, or legal process served on us), to comply with regulatory requirements, to

protect the safety, rights, or property of our customers, the public or Company, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable.

- **Data Transfer:**

Any information you provide to Company through use of this site may be stored and processed, used, transferred between and accessed from the United States and other countries outside the United States that may not guarantee the same level of protection of personal information as the country in which you reside. You hereby consent to such transfer and use in all respects. Company will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is stored/accessed.

- **Business Transfers:**

Circumstances may arise where, whether for strategic or other business reasons, Company may sell, transfer or otherwise disclose some or all of our assets, including your personal information, in connection with a merger, acquisition, reorganization or in the event of bankruptcy. It is Company's practice to seek appropriate protection for information in these types of transactions.

- **In the Aggregate/De-identified:**

Company may disclose de-identified or aggregate data that is not personally identifiable to third parties. Aggregate or de-identified data is created by pooling information about individuals and describing the data in the aggregate, e.g., 20% of customers who clicked on the Y promotion participated in the promotion.

### **Requesting a Change to How We May Use (or Not Use) Your Personal Information**

If you have questions about the use, amendment, or deletion of Personal Information that you have provided to us, or if you would like to opt out of future communications from Company, please contact us by clicking on the "Contact Us" link on the Web site that you are visiting or by emailing us at [info@NoTime4Migraines.com](mailto:info@NoTime4Migraines.com). Alternatively, you may send a letter to the following address:

Promius Pharma LLC  
Attn: Compliance Officer  
107 College Road East  
Princeton, NJ 08540

We will seek to comply with your request(s) as soon as reasonably practicable. Please note that even if you opt out through any of the methods described above, we will not be able to remove your personal information from the databases of our affiliates with which we have already shared your information (i.e., as of the date that we implement your opt-out request). Please also note that if you opt out of receiving marketing-related messages from us, we may still send you important transactional and administrative messages, from which you cannot opt out.

### **Retention Period:**

We retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or allowed by law or to otherwise fulfill a legal obligation.

### **Security Policies:**

We or our Service Providers use technical, administrative and procedural measures in an attempt to safeguard your personal and other information from unauthorized access, alteration, disclosure, destruction or use. Please be advised, however, that while we strive to protect your personal information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online, and are not responsible for the theft, destruction or inadvertent disclosure of your personally identifiable information and we make no representation as to the reasonableness, efficacy, or appropriateness of the measures we use to safeguard such information. Users are responsible

for maintaining the secrecy of their own passwords. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us by contacting us at: [info@NoTime4Migraines.com](mailto:info@NoTime4Migraines.com).

#### **Social Media Uses:**

Company believes strongly that people should be able to share their views and stories in order to improve the lives of patients through the provision of useful and relevant information as a social resource for patients. With this view in mind, from time to time, Company may develop certain campaigns and through the use of online platforms e.g., social media platforms like Facebook, YouTube, Twitter, etc., that allows patients to utilize a public forum or online gathering place where they can openly share such personal experiences and views with others. However, Company at all times, reserves the right to remove any comments and/or shared content if in Company's sole discretion, such information directly talks about and/or names certain medication(s), is offensive to others, or for any other reason we deem fit. In addition, the use of such platforms will be subject to the rules of the third-party site owner. If you consent/do not opt-out, we will share your information with the third party; and the applicable third party policies/ terms of the particular social media forum. Because Company does not have any control over third-party websites/content/services, Company recommends that you read the privacy policies and terms issued by these third parties carefully before participating in such open discussion. Company will not be responsible for such third party social media forum's permitted usages nor any information that is posted by independent third parties on such social media and/or public forums, including but not limited to, the content thereof.

Please be aware that information relating to the approval status and labels of approved products of Company may vary from country to country, and country-specific social media content on this topic may have been issued in the countries where we do business governing such information.

#### **Sensitive Information:**

Unless specifically requested or invited, we ask that you not send us, and you not disclose, any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through this site or otherwise to Company. In those cases where we may request or invite you to provide sensitive information, we will do so with your express consent.

#### **Children's Privacy:**

We are committed to protecting the privacy of children. We do not knowingly collect personal information from children under the age of 18, and we request that these individuals not provide personal information through this site.

#### **Updates to Our Privacy Policy:**

Company reserves the right, at our sole discretion, to change, modify, add, or remove portions of this Privacy Policy at any time without notice. From time to time, we may update and timely post revisions to this Privacy Policy. Any changes will be effective immediately upon the posting of the revised Privacy Policy. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of this site following the posting of any changes to these terms shall mean that you have accepted those changes. If you have any questions or concerns, please email us at [info@NoTime4Migraines.com](mailto:info@NoTime4Migraines.com).