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# PRIVACY POLICY

*(last modified 20 December 2023)*

Neurotech recognizes the importance of helping medical discoveries reach patients and physicians faster. To accomplish our goals, we emphasize operating with transparency and respecting the privacy of all. Accordingly, we have adopted the following privacy policy to tell you how we use and share the Personal Information we collect on our website, [www.neurotechpharmaceuticals.com](http://www.neurotechpharmaceuticals.com) (the “Site”) and in connection with our research and educational programs (the “Programs”). When we refer to ourselves as “we,” “us” or “Neurotech” we mean Neurotech Pharmaceuticals, Inc. and its subsidiaries.

BY USING THE SITE OR PARTICIPATING IN A PROGRAM, YOU AGREE TO THIS PRIVACY POLICY AND CONSENT TO THE TRANSFER AND PROCESSING OF YOUR INFORMATION IN THE UNITED STATES, AND OUTSIDE OF THE UNITED STATES AS FURTHER DESCRIBED BELOW.

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## **Information We Collect and Use**

We collect and use three categories of information from the Site and in Programs: (1) information you provide to us (2) information we may obtain from third parties and (3) information we collect automatically.

- Personal Information That You Provide To Us

“**Personal Information**” is information that can be reasonably used to identify you as an individual person. We may collect the following types of Personal Information.

- When you submit information through our [contact page or enroll in one of our Programs](#), we may collect any contact information that you choose to give us, including your name, title, company, phone number, and email and physical addresses, which we will use to communicate with you and otherwise fulfill the purpose of the contact submission or enrollment.
  - If you submit a job application with Neurotech online, we will collect Personal Information including your contact details, work history, employment needs and interests, and anything you submit in connection with the job for which you are applying.
- Personal Information We May Obtain from Third Parties

We collect Personal Information from a few third-party sources.

- **From Business Partners.** We may partner with other companies and individuals with respect to particular products or services (“Partners”). Partners include our collaboration partners for services that we jointly develop or market. We may receive information from our Partners about your use of co-branded services.
  - **Single Sign-On.** Our web site allows you to use third-party platforms to access certain services. For example, our job application page allows you to auto-fill information through a third-party platform such as LinkedIn. When you login to a third-party platform through our Site, you allow us to access and collect any information from your third-party platform account permitted under the settings and privacy policy of that platform.
  - **Third Party Sharing Tools.** We may provide functionality on the Site that will allow others to share content with you through third party sharing tools, such as widgets, tools or buttons. If someone chooses to use sharing functions to refer our content, products or services to you, we will use your Personal Information and the information provided to share content only. We will not access, store or use the Personal Information of individuals who did not directly provide that information.
- Information We May Collect Automatically

“**Other Data**” is information that is anonymous, aggregated, de-identified or otherwise does not reveal your identity. We do not consider Other Data to be Personal Information except to the extent it is defined as Personal Information under applicable law. Additionally, if we link Other Data together in a way that allows us to identify individuals or combine it with Personal Information, we will treat the combined data as Personal Information.

We use certain types of technologies on our Site to collect Other Data.

- **Cookies and Other Technologies.** We use cookies, tracking pixels and other technologies to collect information about your device or your use of the Site to better understand, customize and improve on our user experience.

Most Internet browsers allow you to remove or manage cookie functions and adjust your privacy and security preferences. For information on how to do this, access the “help” menu on

your Internet browser, or visit [www.aboutcookies.org/how-to-control-cookies](http://www.aboutcookies.org/how-to-control-cookies). Please note, however, that disabling our cookies may prevent you from taking full advantage of all the features of our Site.

- **Tracking Pixels.** Essential information is recorded about user activity and interactions with this website for the purposes of security and site optimization analytics. This limited first-party data may be further enhanced with the help of third-party data sources to help facilitate visitor segmentation and re-engagement through verified marketing channels, within the respective boundaries of applicable legal standards.
- **Logging Technology.** Neurotech maintains web server logs that record data about visitors to our Site. As you use this Site, we may track certain Other Data, including total number of visits, length of visit, requests by page, internet protocol (“IP”) addresses, user statistics (browser and operating systems) and referring sites. We use web server logs to analyze traffic, to help improve our Site, and to reach new and potential applicants for our clinical trials.
- **Website Analytics.** We use third party analytics providers such as Google Analytics to help us evaluate and measure the use and performance of our Site. To opt-out of the aggregation and analysis of data collected about you on our Site by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout> and download and install the Google Analytics Opt-out Browser Add-on.

We may also collect Other Data in a Program, through interviews, questionnaires, discussion groups or similar interactions, and that Other Data may include certain personal health information (“PHI”) as defined under the Health Insurance Portability and Accountability Act of 1996, as in effect from time to time. Whenever we may collect PHI in a Program, we will obtain a consent in connection with its use. Otherwise, we will maintain all PHI in accordance with all applicable federal, state and local laws.

### Other Ways We Use Personal Information

In addition to the above, we also may use your Personal Information to:

- operate our business, deliver our products and services and for any other lawful, legitimate business purposes;
- better understand how our products and services impact you and those you care for, to evaluate, track and respond to safety concerns;
- create, improve and develop our products and services;
- comply with our regulatory monitoring and reporting obligations including those related to adverse events, clinical trials and patient safety;
- support research and development, as well as academic research;
- preventing, investigating or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our Site or data systems, our Programs or to meet legal obligations; and

- investigate and resolve disputes and security issues.

### How We Share Your Personal Information

Neurotech may share your Personal Information in the following ways.

- **In Connection with Business Transfers.** If we sell or transfer all or part of our business or assets to another entity in connection with a sale, merger, divestment, or reorganization, we may share your Personal Information in that transfer, subject to the terms of this Privacy Policy.
- **With Service Providers.** We may retain other companies and individuals to perform services on our behalf (“Providers”). Examples of Providers include data analytics firms, medical research and educational firms, marketing or advertising providers, content and support providers, email vendors, web hosting and development companies, and Program providers. For instance, we use LinkedIn to manage our job application administration system and they may have access to our job applicant’s data. We require these Providers by contract to protect your Personal Information in accordance with applicable law.
- **With Business Partners.** As above, Partners include our collaboration partners for services that we jointly develop or market. Some Partners may collect information on our behalf on our Site or through Program enrollment. Partners may be provided with access to Personal Information needed to perform their functions.
- **To Comply with Law or to Protect.** Neurotech complies with legal, judicial and regulatory requests for information. Neurotech may disclose Personal Information to protect the safety, rights, or property of our customers, the public or Neurotech.

### International Transfer of Information

If you choose to provide us with Personal Information, Neurotech may transfer that information to its affiliates and subsidiaries or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting our web site from the European Union or other regions with laws governing data collection and use that may differ from US law, please note that you are transferring your personally identifiable information to the United States which does not have the same data protection laws as the EU. Any transfer of data from the EU to a non-EU country will be done in accordance with approved methods of transfer under General Data Protection Regulation 2016/679 (“GDPR”). We maintain administrative, technical, and physical safeguards to protect against loss, misuse, unauthorized access, disclosure, alteration, or destruction of the information you provide when visiting or using the site. You accept that the transmission of personal information and other data via the internet is not completely secure. We cannot guarantee the security of your information when it is in the process of being transmitted to and from the site. By providing your Personal Information you consent to:

- The use of your personally identifiable information for the uses identified above in accordance with this privacy policy; and
- The transfer of your personally identifiable information to the United States as indicated above.

The legal basis that we rely on in processing and transferring Personal Data of EU residents (as defined under GDPR) will be one of the following:

- You have consented to our processing of your personal information;
- The processing is necessary to perform a contract with you or to fulfill a request you have made
- The processing is necessary to comply with a legal obligation that applies to the firm under EU or Member State law; or
- The processing is necessary for purposes that are in our legitimate interests to, for example, protect our business and better understand our business partners.

EU residents have the following legal rights in relation to their Personal Data:

- The right to access– You have the right to request copies of your personal data.
- The right to rectification– You have the right to request that we correct any information you believe is inaccurate. You also have the right to request we complete any information you believe is incomplete.
- The right to erasure– You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing– You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing– You have the right to object to the processing of your personal data, under certain conditions.
- The right to data portability– You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

EU residents may exercise these rights by submitting a request to [NTDataPrivacyOfficer@neurotechusa.com](mailto:NTDataPrivacyOfficer@neurotechusa.com). Please note all emails are routed to the U.S.

**EU residents** have the right to lodge a complaint with the appropriate privacy or data protection regulator in your jurisdiction.

### Clinical Research

We conduct, sponsor and support clinical research. Our use of Personal Information collected during such clinical research is not governed by this Privacy Policy. If you are a clinical research participant and have questions regarding the use of Personal Information collected during clinical research, please contact us at [NTDataPrivacyOfficer@neurotechusa.com](mailto:NTDataPrivacyOfficer@neurotechusa.com) or the study site at which you are participating in the research.

### Updating Your Information and Preferences

We retain all Personal Information for the duration of the relevant business relationship or, where required, in accordance with our information management policies and schedules. You may update your Personal Information and your communications preferences in a number of ways.

- If you have an account with us, please log into your account and make the appropriate updates.
- If the information was provided in connection with a clinical trial, your information can be updated by sending an e-mail to us at [NTDataPrivacyOfficer@neurotechusa.com](mailto:NTDataPrivacyOfficer@neurotechusa.com).
- You may always contact us directly for assistance via phone at 401.333.3880 if you have any issues updating your information or communication preferences.

### Notice to California Residents

California law permits California residents to request certain information regarding our disclosure of personal information to third parties for direct marketing purposes. Generally speaking, we do not disclose personal information to third parties for that purpose. However, if you would like to make a request to review information regarding such disclosures, if any exist, please contact us at [NTDataPrivacyOfficer@neurotechusa.com](mailto:NTDataPrivacyOfficer@neurotechusa.com).

### Third Party Sites

Please note that the Site contains links to several other websites, content or services that are owned or controlled by third parties and not Neurotech. Please be aware that Neurotech is not responsible for the privacy practices of sites other than its own. To learn more about the third parties' practices, please read their privacy policies and terms.

### How We Protect Children's Privacy

Neurotech is concerned about the safety and security of children. Our Site is not targeted to or intended for use by children. Accordingly, we do not knowingly collect personal information from children.

### Updates to This Privacy Policy

From time to time, we may update and post revisions to this Privacy Policy. Any changes will be effective immediately upon the posting of the revised Privacy Policy. If we change our information handling practices in a way that materially affects how we handle your Personal Information, we will provide you notice on the Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

### Contact Us

Please contact us if you have any questions or concerns about your Personal Information or require assistance in managing your choices.

### **Neurotech Pharmaceuticals, Inc.**

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Email: [NTDataPrivacyOfficer@neurotechusa.com](mailto:NTDataPrivacyOfficer@neurotechusa.com)