



900 Highland Corporate Drive, Suite 101  
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# PRIVACY POLICY

*(last modified 1 July 2024)*

Neurotech Pharmaceuticals, Inc., and its subsidiaries (collectively, “Neurotech”, “our,” “us,” or “we”) are committed to respecting and protecting the privacy of individuals. It is important to us that we provide transparency regarding our collection, use, and disclosure of your personal information and the steps we take to protect your information from unauthorized use or disclosure. “Personal Information” includes, without limitation, any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

This Privacy Policy applies to our website, as well as online or digital services, social media accounts, electronic mail, and mobile applications that link or reference this Privacy Policy (collectively, “Websites”) and, where applicable, to all Personal Information we obtain and process through other means in the course of doing business (the “Services”). This Privacy Policy may be supplemented or amended from time to time by additional privacy notices (“Privacy Notices”), provided at the time we collect your information. For example, certain Websites may contain Privacy Notices providing more details about the information we collect on those platforms, why we need that information, and choices you may have about the ways we use that information. In other cases, specific Privacy Notices may be required to comply with the privacy laws of one of the countries, provinces, or states in which we do business.

By using our Websites, including your choices regarding cookie settings, or using the Services, you are acknowledging and agreeing to the collection, use, disclosure, and transfer of your information as described in this Privacy Policy (and any additional Privacy Notices that apply to you). If you do not agree to the collection, use, disclosure, and transfer of your information as described in this Privacy Policy (and any Privacy Notices that apply to you), you may not use our Websites or Services.

This Privacy Policy describes how we use, share, and protect Personal Information. It also describes your rights and choices regarding the use, access to, and correction of Personal Information. If you have questions about this Privacy Policy, or any Privacy Notice, please contact us using the information provided below. Where any of your Personal Information is processed based on your consent, you may revoke your consent to the collection, use, disclosure, and transfer of your information as described in this Privacy Policy at any time (and any Privacy Notices that apply to you) by contacting us through the contact information provided at the end of this Privacy Policy.

The Websites are controlled and operated by us from 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.

## **PERSONAL INFORMATION THAT WE COLLECT**

### **Information You Provide Directly to Neurotech**

We collect Personal Information and other data that you voluntarily submit to us, including when you enter information into forms or data fields on our Websites. For example, if you request information about a product or service from us via our “Contact Us” form on our website, information such as your name, email address, phone number, and other contents of your message will be collected. This includes any text characters and any audio, video, and graphic information formats included in the message. If you voluntarily submit Personal Information to us that is sensitive in nature (e.g., health information), that will also be collected and processed for the purposes set out below. When you submit information through our contact page or participate in one of our market research or educational 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 participation. 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. We may combine this information with information we collect or receive about you from other publicly and commercially available sources, such as LinkedIn and other social media platforms. We may combine all the information we receive about you and use or disclose it in the manner described in this Privacy Policy.

The following are the categories and specific types of Personal Information that we collect:

CATEGORIES OF PERSONAL INFORMATION	TYPES OF PERSONAL INFORMATION
Personal Identifiers	Full name, address, email, phone number, date of birth, username, signature, social media handles, or other similar identifiers
Government Identifiers	Including your driver’s license number, social security number, or other similar government-issued identifiers in the event you are hired as an employee or contractor of Neurotech
Device Information and Other Unique Identifiers	Including device identifiers, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, or similar unique identifiers
Internet or Other Network Activity	Including browsing history and information about your interactions with our Websites
Health and Medical Information	Including information you choose to provide regarding eye conditions, symptoms, diagnoses, or medications
Demographic Data	Including age, gender, race, ethnicity, some of which may include characteristics of protected classifications under state or federal law
Employee and Job Applicant Information	Including employment information (such as education and employment history) and any other information you provide in connection with applying for employment with Neurotech, bank account information, insurance policy information, information obtained in connection with administering employee benefit plans, salary information, passport number and information, drivers license or state identification number, disability and medical leave application information

We may also collect Personal Information on our Websites at other points that explicitly state that Personal Information is being collected from you through a Privacy Notice. In these circumstances, Neurotech will disclose the purpose of collecting your Personal Information and will only use it for the purposes stated.



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### **Information We May Collect Automatically**

Like many companies, Neurotech and its third-party service providers use a variety of tracking technologies such as cookies, embedded web links, pixel tags, Flash cookies, and web beacons, to passively collect certain information about your use of and visits to our Websites. For example, we may collect your Internet Protocol (IP) address, your authentication information, the type of device used, the web browser and operating system used to access our Websites, the time and duration of your visits, your search queries, and information about the content and webpages you view and the features you access on a Websites. This information helps us better understand the use and effectiveness of our Websites and is in a form that does not, on its own, permit direct association with any specific individual, however, much of this information is considered Personal Information as defined above.

Here is more information about some of tracking technologies, cookies, and how they work:

A cookie is a file containing an identifier that is sent by a web server to a browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may not contain any information that personally identifies a user, but Personal Information that we store about you may be linked to the information stored in and obtained from cookies. To the extent that cookies that are not strictly necessary for the provision of the Websites, we will ask you to consent to such use of cookies when you first visit the websites.

We use cookies for the following purposes:

- **Session** – A session cookie contains information that is stored in a temporary memory location and then subsequently deleted after the session is completed or the web browser is closed. This cookie stores information that the user has input and tracks the movements of the user within the websites. The session cookie will be deleted when the expiration date is reached or when a user or application manually deletes it.
- **Strictly Necessary** – Strictly Necessary cookies are used to provide an online service (e.g., our Websites or Services) which you have requested.
- **Performance** – These cookies are used specifically for gathering data on how you use our Websites, which pages of our Websites are visited most often, or if you get error messages on web pages. These cookies only monitor the performance of our Websites as users interact with it. These cookies do not collect your Personal Information, which means all the data collected is anonymous and only used to improve the functionality of the Websites.
- **Advertising and Analytics** – Analytical cookies are used to analyze the way a user interacts with our Websites to help us create a better user experience. Advertising cookies allow us to create and display ads about our Services on the internet.

One of the third-party services that we use to track your activity and understand your behavior on our Websites is Google Analytics. Information that we collect may be combined with other information about you using Google Analytics or other services. We use these technologies, alone or in combination, to understand user behavior (by tracking unique user IDs), and to target and measure the effectiveness of advertisements, help diagnose problems, and facilitate your access to, and use of, the services offered on our Websites. Where applicable, we will collect your consent using a cookie banner on the front page of our website prior to using any non-essential cookies.

Neurotech also uses Google AdWords, which uses a conversion tracking cookie (also called a “conversion pixel”) whenever you click on a Neurotech ad delivered by Google. These cookies become ineffective after 30 days and are not used for personal identification. If you visit specific pages of our website, Google, and Neurotech can track whether you were forwarded to that page by clicking on one of our ads.



Data obtained through use of conversion cookies are used for statistical reporting only: these statistics tell us the number of users who clicked on the ad delivered by Google and opened a webpage having a conversion tracking tag. We do not, however, receive any information allowing personal identification of users from Google. We are unable to cross-reference the data obtained to any specific user. Information about how to opt out of Google AdWords can be found on the Google Ads Settings web page.

## **Information Collected From Other Sources**

Neurotech may also collect information about you from other sources to help us correct or supplement our records, improve the quality or personalization of our services to you, and prevent or detect fraud.

## **USE OF YOUR PERSONAL INFORMATION**

We use the Personal Information that we collect and receive for the following purposes:

- To operate our business, to help us develop, operate, deliver, and improve our Websites and our other products, Services, offerings, and for any other lawful and legitimate business purposes;
- To provide you with information you request or respond to inquiries we receive from you or your company or organization;
- To analyze how users use our Websites and related analysis, research, reporting, and troubleshooting as we believe is necessary or appropriate to protect, enforce, or defend legal rights, privacy, safety, or property, whether our own or that of employees, agents, or others;
- To comply with our regulatory and reporting obligations including those related to adverse events, clinical trials, and patient safety;
- To support research and development, as well as academic research;
- To prevent, investigate, or provide notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our Websites, or data systems, our Services, or to meet legal obligations;
- With your consent, to provide you with promotional and marketing materials, relevant content, and advertisements, surveys, newsletters, questionnaires, and other materials; and to comply with applicable law; and
- To promote and market our products and services to you based on information obtained from third parties.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We will not disclose any Personal Information we collect from you to any third parties except as indicated below:

- Neurotech and Affiliates. We will share information within Neurotech and with our corporate affiliates for the purposes set out in this Privacy Policy, such as responding to your inquiry and providing you with information that you have requested.
- Consultants, Service Providers, and Professional Advisors. Some affiliated and third-party consultants and service providers, such as partners that provide us technical support, information we request processing, data, and website hosting, event hosting and registration, customer support, and other services, collect certain information relating to your use of our Websites, including through the use of cookies, Web beacons, and similar technologies. We may also share your Personal Information with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.



- **Enforcement of Rights/Security.** We may disclose information (i) when required by law or in response to a request for cooperation by a government entity or law enforcement; (ii) to protect and/or enforce the rights, property interests, or safety of us, or any of our respective affiliates, business partners, customers, or employees; or (iii) to resolve disputes, troubleshoot problems, prevent fraud and otherwise enforce this Privacy Policy.
- **Reorganization of Neurotech.** Circumstances may arise where we decide to reorganize or divest part (or all) of our business or a line of our business (or any portion of our assets). We may disclose Personal Information to a buyer or successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Neurotech's assets, whether in the course of doing business or as part of bankruptcy, liquidation, receivership, or similar proceeding in which Personal Information held by Neurotech are among the assets or stock to be transferred.
- **With Your Consent.** We may share your information when you or your company or organization consent to or request such sharing.

#### **RETENTION OF YOUR PERSONAL INFORMATION**

We retain Personal Information for as long as needed or permitted considering the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time that is necessary for the purposes for which your Personal Information is processed, unless applicable law requires storage for a longer period of time;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them); or
- Whether retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation, or regulatory investigations).

#### **PROTECTING YOUR PERSONAL INFORMATION**

The security of your information is important to us. We employ commercially reasonable security controls to protect the Personal Information submitted to us from unauthorized access, loss, interference, misuse, disclosure, alteration, or destruction, both during transmission and once we receive it. Neurotech employees who have access to Personal Information are made aware of and trained on the importance of keeping it confidential.

We care about the security of Personal Information and use various administrative and technological safeguards to preserve the integrity and security of all Personal Information collected through our Websites. These safeguards vary based on the sensitivity of the Personal Information that we collect, process, and store, and the current state of technology.

Unfortunately, the transmission of information via the internet is not completely secure. Although we make commercially reasonable efforts to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Websites. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Websites. If you have any questions about data security and integrity on our Websites, you can contact us using the details in the "How to Contact Us" section below.



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## **ACCESSING AND REVIEWING YOUR PERSONAL INFORMATION**

You may review and update the Personal Information we have collected, including your name, phone number, email, and postal address, and other information by which you can be personally identified. You may update your Personal Information and your communication preferences in several ways and depending upon the nature of your relationship with us:

- For current and former employees and consultants, if you have an account with us, please log into your account and make the appropriate updates.
- You may always contact us directly for assistance via the contact information provided at the end of this Privacy Policy if you have any questions regarding updates to your information or communication preferences.

## **INTERNATIONAL TRANSFERS**

As Neurotech is a global organization, the Personal Information you provide may be transferred to Neurotech or a third party in the United States, whose laws may not provide the same level of data protection for your Personal Information as in your country. By using our Websites and providing us with your Personal Information, where applicable law permits, you consent to such transfers, as well as the processing, and storage of such information outside your country of residence.

## **LINKS TO OTHER WEBSITES**

Our Websites may contain links or references to third party owned or operated websites or online services. Neurotech is not responsible for the collection of Personal Information or the security or privacy of any such third-party sites or services. Likewise, Neurotech is not responsible for the collection, usage, and disclosure policies and practices (including the data security practices) of any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any information you disclose to such other organizations through or in connection with our social media pages, any mobile sites, applications, widgets, and other mobile interactive features. We encourage you to review the privacy policies posted on the websites you visit.

## **OPT OUT OF MARKETING COMMUNICATIONS**

You will only receive information about our products and services and special offers from us if you specifically request it. At any time after making such a request, you can let us know that you no longer wish to receive such information by contacting us using the details in the "How to Contact Us" section below. If you are emailing us, please place "Opt-Out Request" in your email subject line.

## **CHILDREN'S PERSONAL INFORMATION**

Our Websites are intended to be used by adults and corporate entities interested in Neurotech. It is not intended for children, and Neurotech does not knowingly collect or store Personal Information about anyone under the age of 18 without proper consent, such as the consent of their parent or guardian.

## **CALIFORNIA "SHINE THE LIGHT" LAW**

California law permits California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. If you would like more information, please submit a written request to us, and as required by California state law, we will either (a) respond with a confirmation that we



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have not disclosed any Personal Information to third parties for direct marketing purposes in the previous calendar year, or (b) if our practices have changed, we will provide the categories of Personal Information that have been shared for direct marketing purposes in the past twelve (12) months and categories of third parties to whom such Personal Information was disclosed for such purposes, whichever is relevant.

#### **CLINICAL RESEARCH**

We conduct, sponsor, and support clinical research. This Privacy Policy does not apply to participants in a clinical trial, clinical study, or research project (“Clinical Research”). Clinical Research participants should review the notice provided at the time they enrolled in the Clinical Research to understand how Neurotech uses their Personal Information. If you have more questions about 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 Clinical Research.

#### **CHANGES TO THIS PRIVACY POLICY**

Neurotech regularly reviews this Privacy Policy and ensures that we process your information in a manner compliant with applicable laws. We reserve the right to change this Privacy Policy from time to time to reflect changes in our business practices, technological advancements and legal/regulatory environment. Any changes to this Privacy Policy, including information collected and the use and disclosure of that information will be posted here. Following any modification, we will revise the “last updated” date at the top of this Privacy Policy. If you are concerned about how your information is used, you should check our websites periodically. By continuing to use our Websites following the “last updated” date of any updated Privacy Policy, you are agreeing to be bound by the terms and conditions of such updated Privacy Policy.

#### **HOW TO CONTACT US**

You may contact us with any questions, concerns, or inquiries about this Privacy Policy or our privacy practices. If you would like to make a formal complaint, please contact [NTDataPrivacyOfficer@neurotechusa.com](mailto:NTDataPrivacyOfficer@neurotechusa.com).

All complaints will be evaluated and a reply will be sent as soon as appropriate. In some instances, Neurotech may cease services to you if necessary to satisfy your request.

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