PRIVACY POLICY

Last updated June 28, 2018

Thank you for choosing to be part of our community at Orum Therapeutics, Inc. (“company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at info@orumrx.com.

When you visit our website www.orumrx.com, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website (such as www.orumrx.com), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Sites").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We may collect personal information that you provide to us such as name, email, phone number, and similar contact information.

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use. The personal information we collect can include the following:

Name and Contact Data. We may collect your first and last name, email address, phone number, and other similar contact data when you subscribe to our newsletter or use our online contact form.

Information automatically collected

In Short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our Sites.
We automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Sites and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

**Information collected from other sources**

**In Short:** We may collect limited data from public databases, marketing partners, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we may receive from other sources include: social media profile information; marketing leads and search results and links, including paid listings (such as sponsored links).

**2. HOW DO WE USE YOUR INFORMATION?**

**In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To send you informational business communications** for Business Purposes and/or with your Consent. You can opt-out of our emails at any time using the unsubscribe feature at the bottom of any email.

- **To send administrative information to you** for Business Purposes, Legal Reasons and/or possibly for Contractual. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

- **To enforce our terms, conditions and policies** for Business Purposes, Legal Reasons and/or possibly Contractual.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

3. **WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

*In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.*

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: data analysis, email delivery, and hosting services. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

- **With your Consent.** We may disclose your personal information for any other purpose with your consent.

4. **DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**
**In Short:** We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We use cookies to compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, it may affect your user experience.

**5. DO WE USE GOOGLE AND GOOGLE MAPS?**

**In Short:** Yes, we use Google Analytics and Google Maps for the purpose of providing better service.

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. 
https://support.google.com/adwordspolicy/answer/1316548?hl=en

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together compile data regarding traffic throughout the site so we can improve the website for the best user experience. Users can set preferences by using the Google Ad Settings page or opt out by using the Google Analytics Opt Out Browser add on.

This website, mobile application, or Facebook application uses Google Maps APIs. You may find the Google Maps APIs Terms of Service here. To better understand Google’s Privacy Policy, please refer to this link.

By using our Maps API Implementation, you agree to be bound by Google’s Terms of Service.

**6. HOW LONG DO WE KEEP YOUR INFORMATION?**
In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Sites, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent’s use of the Sites. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at info@orumrx.com.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

CAN SPAM Act. The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.
We collect your email address, when provided in the newsletter subscriptions or 'contact us' form, in order to send information, respond to inquiries, and/or other requests or questions.

To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.

- Identify the message as an advertisement in some reasonable way.

- Include the physical address of our business or site headquarters.

- Monitor third-party email marketing services for compliance, if one is used.

- Honor opt-out/unsubscribe requests quickly.

Allow users to unsubscribe by using the link at the bottom of each email.
If at any time you would like to unsubscribe from receiving future emails, you can follow the instructions at the bottom of each email and we will promptly remove you from ALL correspondence.

If at any time you would like to view your personal data we have collected, if any, please email info@orumrx.com.

**Fair Information Practices.** The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur we will notify you via email within 72 hours of discovering the breach.

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

**Do Not Track.** Do Not Track is a privacy preference that can be configured in certain web browsers (the “DNT Feature”); the DNT Feature, when enabled on a web browser, signals the websites you visit that you do not want certain information about your visit collected. As the Internet industry is in the process of defining how to interpret signals sent by the DNT Feature, Orum does not currently respond or recognize DNT Feature signals.
Cookies and similar technologies. Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites. To opt-out of interest-based advertising by advertisers on our Sites visit [http://www.aboutads.info/choices/](http://www.aboutads.info/choices/).

10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

**In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Sites, you have the right to request removal of unwanted data that you publicly post on the Sites. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Sites, but please be aware that the data may not be completely or comprehensively removed from our systems.

**California Online Privacy Protection Act.** CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. - See more at: [http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf](http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf)

According to CalOPPA, we agree to the following:

Users can visit our site anonymously. This privacy policy will be housed in a link on our home page or as a minimum, on the first significant page after entering our website. Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.

Should the privacy policy change, and you have subscribed to our mailing list, you will be notified of any changes via email. All other changes can be seen by visiting our Privacy Policy Page.
Can change your personal information by emailing us or following the instructions at the bottom of any email.

11. DO WE MAKE UPDATES TO THIS POLICY?

*In Short:* Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have any further questions or comments about us or our policies, email us at info@orumrx.com or by post to:

Orum Therapeutics, Inc.
2fl, 281-25 Munji-ro
Yusung-Gu, Daejeon, Korea — 34050