



## Privacy Policy

*This Privacy Policy was last updated on August 26, 2019*

Sprout Pharmaceuticals, Inc. (the “Company” or “we”) respects your privacy and is providing this privacy policy (the “Privacy Policy”) to describe our privacy practices for [www.sproutpharmaceuticals.com](http://www.sproutpharmaceuticals.com) (the “Site”). By using the Site, you agree to all of the terms and conditions of this Privacy Policy. Please be sure to read this entire Privacy Policy before using the Site or submitting information to the Site. If you disagree with or do not accept any part of this Privacy Policy, do not use the Site or submit any information to the Site.

The Privacy Policy is a part of, and subject to, the Site’s Terms & Conditions of Use (“Terms”). The Privacy Policy and the Terms are legally binding on all users of the Site.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the Site, and our practices with regard to that information. This Privacy Policy explains:

1. How we collect your information and the types of information we collect;
2. How we use and may disclose your information;
3. The measures we take to secure and protect your information;
4. Your rights and choices with regard to your information; and
5. How you can contact us with questions about your information or this Privacy Policy.

The Privacy Policy applies to information we collect when you visit or use the Site and in email and other electronic or written messages between you and the Company initiated through the Site.

The Privacy Policy does not apply to information collected by the Company through any other means, including on any other website owned or operated by the Company or information collected offline.

### **1. Collection of Information**

#### **(a) Active Collection of Personal Information**

The Company collects information you provide in connection with your access to and use of the Site. This may include:

- Information such as your name, phone number, email address, or other information you choose to provide to us using the contact us forms, employment opportunity forms, or email links on the Site. This also includes records and copies of correspondence, including personal information, that you generate through the Site if you communicate with us through email or other written correspondence.
- Investigator and proposed study information you provide when submitting a proposal for

investigator sponsored studies such as: name, education and employment information, and address, phone, and email address.

#### **(b) Passive Collection of Information**

We collect information automatically when you visit our Site, such as through the use of cookies. Cookies are text files the Site places on your computer's hard drive to store information about your preferences. We use cookies to identify which pages of the Site are being used, to analyze data about Site traffic, to enhance user experience with the Site, and for other statistical analysis. You can choose to accept or decline cookies. Most website browsers automatically accept cookies but you can usually modify your browser settings in accordance with your preferences. If you decline cookies, this may prevent some of the Site's features from fully functioning.

In addition to cookies, we may also use automatically-collected information that helps us to customize the Site to match our users' individual interests and recognize returning users, estimate the number of website-users and their usage patterns, and increase the speed of our users' searches. For example, we may use the below tools to collect this data:

- "Pixel tags," "web beacons," "clear GIFs," or similar means (collectively, "Pixel Tags"). We use these small electronic files to compile aggregate statistics about Site usage and response rates. Pixel Tags allow the Company to count the number of users who have visited certain pages of the Site, to deliver branded services, and to help the Company determine the effectiveness of its promotional or advertising campaigns as well as the effectiveness of the Site itself. When Pixel Tags are used in HTML-formatted email messages, they can tell the sender whether and when the email has been opened.
- Referrers and your Internet Protocol (IP) Address. Referrers are small files containing information your web browser passes to the Company's web server that references the URL which you used to access the Site. Your IP address is the number used by computers on the network to identify your computer so that you can receive data.
- Environmental variables. Environmental variables include, but are not limited to, the domain from which you access the Internet, the time you accessed the Site, the type of web browser, operating system, and platform your computer uses, the Internet address of the previous website you visited before entering the Site, the names of the pages you visit while at the Site, and the next Internet website you visit after leaving the Site.

The Site also uses Google Analytics, a web analytics service provided by Google, Inc. ("Google") to help analyze how users use the Site. Google Analytics uses cookies and other tracking technology to collect aggregate data ("Aggregate Data") from your visits to the Site. To learn more about the privacy policy of Google Analytics, refer to [Google's Policies and Principles](#). Use the [Google Analytics Opt-out Browser Add-on](#) to prevent analytics information from being sent to Google Analytics. The Company stores any Aggregate Data we collect from you in aggregate form, such that it does not identify any particular user or individual from the Aggregate Data. The Company uses the Aggregate Data it collects in a variety of ways, including but not limited to keeping count of return visits to the Site, accumulating and reporting aggregate statistical information regarding the Site, and determining which features Site users prefer. By using the Site, you consent to the processing of data about you by Google.

## **2. How We Use and Share Information**

The Company may use your personal information to:

- (a) Provide you with information, products or services or otherwise respond to your requests.
- (b) Communicate with you about our products or services or other offerings we think may be of interest to you, to promote our products, or to conduct market research.
- (c) Improve our Site, products and services or provide you with technical support.
- (d) Protect the security and integrity of the Site and our internal systems or to prevent fraud or other prohibited or illegal activity.
- (e) Meet legal requirements, establish or defend a legal claim, or otherwise comply with applicable industry standards or laws.

The Company may share your personal information with third parties, including:

- (a) Our subsidiaries and affiliates as necessary for the purposes described above.
- (b) Our service providers or business partners to perform functions on behalf of the Company and facilitate our business operations. These providers have limited access to your information to perform tasks on our behalf, such as Site optimization, and are contractually bound to protect and to use your information only for the purposes for which it was disclosed and consistent with this Privacy Policy.
- (c) In the event of a transfer of ownership, assets, securities, or bankruptcy involving the Company and in connection with Company business transactions such as buying or selling subsidiaries or engaging in joint ventures with third parties, the Company reserves the right to share any information collected pursuant to this Privacy Policy.
- (d) We may disclose your information to courts, law enforcement, governmental authorities, or other third parties as authorized or required by law in order to comply with our legal obligations, to raise or respond to a legal claim, or to protect the rights, property, or personal safety of the Company, its employees, or members of the public.
- (e) The Company may share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

### **3. Third-Party Websites**

The Site may provide links to other websites. These websites operate independently from the Site and may have their own privacy policies or statements. We encourage you to review the privacy policy of any third-party website or resource before using it. We do not have control over these external websites and cannot be responsible for the privacy of any information you provide while visiting such sites, which are not governed by this Privacy Policy.

#### **4. Security and Protection of Personal Information**

The Company does not sell, rent, or trade any personal information you provide to the Company, nor does it disclose any such personal information to any third parties outside the Company except as specified under this Privacy Policy and except in those specific instances when a user gives the Company specific permission to do so. We also do not disclose your information to third parties for third parties to market their products or services to you.

The Company uses physical, technical, and organizational security controls reasonably designed to protect your personal information against accidental or unlawful destruction, loss, alteration, or unauthorized use or disclosure. Although guaranteed security does not exist on the Internet or offline, we make commercially reasonable efforts to handle such information consistent with this Privacy Policy and applicable laws. Due to the design of the Internet and other factors outside our control, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties.

#### **5. Your Rights**

The Company may contact users who have entered personal information in connection with the Site. You may “opt out” of receiving marketing and promotional emails by following the opt-out procedure described in each email the Company sends. However, even if you opt out of receiving marketing and promotional emails, the Company may continue to email you for administrative or informational purposes, including follow-up messages regarding any content you have submitted to the Site.

You also have the right to ask the Company to correct inaccurate or incomplete personal information concerning you.

#### **6. Notification of Changes**

The Company reserves the right, in its sole discretion, to change, modify, add, or remove portions of this Privacy Policy at any time by updating this posting. Please check this Privacy Policy frequently for updates. The date at the top of this Privacy Policy will indicate the effective date of any changes. We will post a prominent notice on the Site to notify you of any significant changes to this Privacy Policy. By continuing to use the Site following the posting of changes to this Privacy Policy, you accept any such changes.

#### **7. Tracking**

At this time, the Site does not respond to web browser “do not track” signals. We may add this functionality in the future, and if we do, we will update this Privacy Policy to let you know. We do not authorize third parties to collect personal information through the Site to tracking you online activities over time and across different websites.

#### **8. Children’s Privacy**

The Site is not directed to or intended for children under the age of 18. We also do not knowingly collect personal information from children under the age of 18. If you are the parent or guardian of a child and you believe we have inadvertently received personal information about that child, please contact us as described in Section 9 below and we will delete the information from our records.

## **9. Contact Us**

If you have any questions, requests related to your personal information, or would like to exercise any of the rights described in Section 5, you may contact us by emailing our designated request email at: [info@sproutpharma.com](mailto:info@sproutpharma.com) or by writing to us at the following address: Sprout Pharmaceuticals, Inc., 4350 Lassiter at North Hills Ave., Suite 260, Raleigh, NC 27609.