

Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE ACCESSING ANY PAGES IN THIS OR ANY OTHER BRAEBURN WEBSITE OR BEFORE ACCESSING, DOWNLOADING, VIEWING, OR USING, IN ANY MANNER, FROM YOUR SMART PHONE OR OTHER MOBILE DEVICE, ANY APPLICATION (OR “APP”), DISTRIBUTED, PRODUCED, DEVELOPED, MARKETED, OR MADE AVAILABLE BY BRAEBURN THROUGH ANY BRAEBURN WEBSITE (COLLECTIVELY, THE “SITE”).

Braeburn Inc. (Braeburn) respects the privacy of visitors to our Site and those who wish to access specific content or services (referred to individually as “User” and collectively as “Users”).

This Privacy Policy describes what information we may collect from you or on your behalf, how we use that information, and what we do to protect it. By using the Site you expressly consent to the collection, use, and disclosure of your personal information as described in this Privacy Policy.

This Privacy Policy is incorporated into and is subject to the Braeburn Terms of Use. Your use of the Site and any personal information you provide on the Site is subject to the Terms of this Privacy Policy and the Braeburn Terms of Use.

THE INFORMATION BRAEBURN COLLECTS:

Personally Identifiable Information: You may provide to Braeburn what is generally called “Personally Identifiable Information” (sometimes “PII”) (such as your name, email address, postal mailing address, home/mobile telephone number, fax number, billing information, personally identifiable Health Information, and the names and email addresses of other

individuals to whom you forward content from the Site) when using the Site. For example, if you use the Site to contact Braeburn, we will ask for your email address so that we can respond to you.

Health Information: You may provide to Braeburn what is generally called “Health Information” (including but not limited to any and all spoken or written information about your health, treatment, medications, insurance benefits, and other data collected and maintained by Braeburn as part of your communication). By contacting Braeburn via the Site, you authorize Braeburn to receive, use, disclose, transmit, and maintain Health Information on your behalf in connection with any ongoing support and services provided to you by Braeburn.

Automatically Collected Information: When you visit the Site, we may automatically record certain information from your web browser by using different types of technology, including “clear gifs” or “web beacons.” This “Automatically Collected Information” may include your internet protocol address (“IP Address”), web browser type, the web pages or sites that you visit just before or just after the Site, the pages you view on the Site, and the dates and times that you visit the Site.

Registration: Some of the services provided on this Site may require registration. When registering with Braeburn, you may need to complete certain data fields as well as provide a username and password. This registration discloses your identity. Please note that in the event you decide to withhold certain requested personal data, it may not be possible for you to access certain parts of the Site or access certain services.

HOW WE USE YOUR PERSONAL INFORMATION

Subject to applicable data protection laws, we may use your personal information for the following purposes: (i) to provide you with the services and information offered through the Site; (ii) to contact you and respond to your requests and inquiries; (iii) for business administration, including statistical analysis; (iv) to personalize your visit to the Site and to assist you while you use the Site; (v) to improve the Site by helping us understand who uses the Site; (vi) to contact you to tell you about products and services offered by us which we believe may interest you; and (vii) for fraud prevention and detection and to comply with applicable laws, regulations or codes of practice.

SHARING OF YOUR PERSONAL INFORMATION

We may use selected third parties to provide us with services, including companies that provide us with technical support and assistance in respect of the Site, who may have access to your personal information while performing services on our behalf. Our affiliates may also have access to your personal information including through or in connection with this Site for the purposes set out in this Privacy Policy.

Similarly, we may share your personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others, including to advisers, law enforcement, judicial and regulatory authorities. We may also transfer your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or shares (including in connection with any bankruptcy or similar proceedings.)

The servers used in the operation of the Site automatically identify a computer by its IP address. If we, in good faith, determine that you have or are attempting to misuse or harm the Site, we may investigate and cooperate with appropriate law enforcement to protect our rights or property.

ONLINE PRIVACY FOR CHILDREN

Braeburn is committed to protecting the privacy of children. We do not intend to collect personally identifiable information from children under 18 years old. If a child has provided us with personally identifiable information, the parent or guardian of that child may [contact us](#).

Notice to California Residents

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of Braeburn Inc. and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

**Personal
information we
collect**

**CCPA categories of
personal information**

**Sources of
personal
information**

**Purposes for which
we may collect and**

	(Definitions are available here)		use personal information
	○ Identifiers		
	○ Personal information categories		
○ Correspondence	○ Professional or employment related		○ To provide services and information
○ Digital Information	○ Protected classification characteristics	○ You	○ To respond to inquiries
○ Demographic information	○ Commercial Information	○ Business partners	○ Hiring
	○ Inferences		
	○ Internet or Network Information	○ You	○ To operate the site
○ Device data	○ Geolocation data	○ Automatic collection	○ To create anonymous data for analytics
○ Online activity data	○ Online Identifiers		

This notice does not apply to the information we collect in connection with clinical trials, or to any health or medical information we collect that is otherwise governed by California’s Confidentiality of Medical Information Act or the Health Insurance Portability and Accountability Act of 1996. This notice also does not apply to information related to our business contacts (including healthcare providers).

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We do not sell personal information.

California Residents' Privacy Rights

The information provided in this section applies only to California residents.

The California Consumer Privacy Act of 2018 ("CCPA") grants California residents the following rights.

You can request information about how we have collected, used and shared and used your Personal Information during the past 12 months.

- **Access.** You can request a copy of the personal information that we maintain about you.
- **Deletion.** You can ask us to delete the personal information that we collected or maintain about you.

You are entitled to exercise the rights described above free from discrimination. Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you.

How to submit a request

- **To request access to or deletion of personal information:**
 - email CCPA@braeburnrx.com
- **Identity verification.** We will need to confirm your identity and California residency to process your requests to exercise your information, access or deletion rights. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

- **Authorized agents.** California residents can empower an “authorized agent” to submit requests on their behalf. We will require the authorized agent to have a written authorization confirming that authority.