

PRIVACY STATEMENT

Noden Pharma DAC is committed to protecting and respecting your privacy. This Privacy Statement sets out how we, as a Data Controller, collect, use, process and disclose the personal data (**Data**) we collect from you or that you provide to us on our website www.nodenpharma.com (**Site**). This Privacy Statement should be read in conjunction with our **Cookie Policy**.

This Site is not intended for children and we do not knowingly collect data relating to children.

Please read the following carefully to understand our use of your Data. You have the right to object to us processing your Data on the basis of our legitimate interests.

1. Information we may collect from you

We only collect Data about you on the Site which you volunteer when you e-mail us or by using our online feedback or other forms. We collect and process the following data about you:

- Your name, email address, and/or any other information that you provide to us by filling in forms on our Site
- Your IP address
- Your browser type
- Your referring URL
- Time and date of your visit

You are not obliged to provide us with your Data, but failure to provide us with your contact details may result in us being unable to respond to any questions or requests you submit to us via our website.

2. How we use information we collect

Any Data collected from visiting our Site will only be used where necessary for the purposes of our legitimate business interests to:

- Improve the content of our Site and the services we offer
- Ensure the Site is presented in the most effective manner for you and for your computer
- Compile statistical data on the use of our Site
- Allow you to participate in interactive features of our service, when you choose to do so

In pursuing these legitimate interests we will respect your right to protection of your Data, and will make no attempt to identify you, or to associate the technical details we collect from your visit, unless required to do so by law.

We will store your Data only for as long as necessary for the purposes of providing access to our Site and related services to you; as required by law, and for the exercise or defence of legal claims.

3. Disclosure of your information

We may disclose your Data to third parties who provide a service to us, including our Internet Service Provider who records data on our behalf and is bound by confidentiality provisions, or in the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets or if we are under a duty to disclose or share your Data in order to comply with any legal obligation, or where necessary for our legitimate business interests to protect the rights, property, or safety of Noden Pharma DAC, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The transmission of information via the Internet is not completely secure and may involve the transfer of Data to a third party outside of the European Economic Area (**EEA**). To the limited extent that it is necessary to transfer your Data outside of the EEA, we will ensure appropriate safeguards are in place to protect the privacy and integrity of such Data, including standard contractual clauses under Article 46.2 of the GDPR. Please contact us if you wish to obtain information concerning such safeguards (see Contact Us below).

4. **Links to other sites**

Our Site may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any Data to those websites.

5. **Your rights**

You have the right to request access to, rectification, or erasure of your Data, or restriction of processing or object to processing of your Data, as well as the right to data portability. The following is a summary of what these rights involve:

- **The right of access** enables you to receive a copy of your Data.
- **The right to rectification** enables you to correct any inaccurate or incomplete Data.
- **The right to erasure** enables you to ask us to delete your Data in certain circumstances, for example where it is no longer necessary for us to process it or if you consider it is being unlawfully processed. Your request can be refused if the processing is necessary to comply with an EU or Irish legal obligation or for the exercise or defence of legal claims.
- **The right to restrict processing** enables you to ask us to halt the processing of your Data in certain circumstances, for example if you want us to verify its accuracy or our legitimate interests in processing it.
- **The right to object** enables you to object to your Data being processed on the basis of our legitimate interests (or those of a third party). We will stop such processing unless there are compelling legitimate grounds for the processing or the processing is necessary for the exercise or defence of legal claims. You also have the right to object to us processing your Data for direct marketing purposes.
- **The right to data portability** enables you to request us to transmit Data, that you provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party.

Any requests to exercise your rights should be addressed to info@nodenpharma.com. We will respond to your request in writing, including by electronic means, or orally if requested, within one month of receipt of your request. We may request proof of identification to verify your request. We have the right to refuse your request if it is manifestly unfounded or excessive, or to the extent necessary for important objectives of general public interest.

You have the right to lodge a complaint with the Data Protection Authority, in particular in the Member State of your residence, place of work or place of an alleged infringement, if you consider that the processing of your Data infringes the GDPR.

6. **Security and where we store your personal data**

We are committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your Data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being

transmitted to us over the Internet. We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation. We will continue to revise policies and implement additional security features as new technologies become available. Where we have given you a password which enables you to access certain parts of our Site, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to our Site. Any transmission of Data is at your own risk. Once we receive your Data, we use appropriate security measures to seek to prevent unauthorised access or disclosure.

7. Changes to this Privacy Statement

We reserve the right to change this Privacy Statement from time to time at our sole discretion. If we make any changes, we will post those changes here and update the "Last Updated" date at the bottom of this Privacy Policy. Please check this Statement periodically for updates.

8. Contact Us

Questions, comments, requests and complaints regarding this Privacy Statement and the Data we hold are welcome and should be addressed to info@nodenpharma.com or sent in writing to D'Olier Chambers, 16A D'Olier Street, Dublin 2, Ireland. All requests will be dealt with promptly and efficiently.

Last Updated: April 2018