

Tolero Pharmaceuticals Inc. Website Privacy Notice Supplemental Notice for California Consumers

[Last Updated January 1, 2020]

Why?

The California Consumer Privacy Act of 2018 (CCPA) gives California residents the right to know what Personal Information Tolero collects about them, including whether it is being sold or disclosed to third parties. The CCPA also grants certain rights to California residents, including the right to delete their Personal Information (subject to certain exceptions) and the right to prevent Tolero from selling their Personal Information. Companies are also prohibited from retaliating or discriminating against consumers for exercising their rights under the CCPA.

All companies need to collect and share consumers' Personal Information for everyday business purposes, marketing, and maintenance of the safety, security, and integrity of their websites and other assets, among other reasons. This Supplemental Notice provides the information required under the CCPA and applies to both Tolero's online and offline activities. For more information about how we collect, use, and share information through our websites and online services, please review our [Privacy Notice](#).

What?

The types of Personal Information we collect, disclose, and sell depends on your relationship and interaction with Tolero. Please review the Consumer Type below that applies to your relationship or interaction with Tolero to learn about the categories of personal information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting or selling the personal information, the categories of third parties with whom we share the personal information, and if we sell the information, the categories of third parties to whom we sell it. If you interact with Tolero in more than one way, please review each Consumer Type below that applies to you in order to learn about the Personal Information we collect and how we use and share it in connection with each particular relationship.

In addition to the purposes for collecting and sharing Personal Information described under each Consumer Type below, Tolero collects and discloses any and all Personal Information (regardless of your relationship or interaction with us) as necessary or appropriate to: comply with laws and regulations; monitor, investigate, and enforce compliance with and potential breaches of Tolero policies and procedures and legal and regulatory requirements; comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and exercise or defend the legal rights of Tolero and its employees, affiliates, customers, contractors, and agents.

Personal Information

In this Supplemental Notice, "Personal Information" (or "PI") means any information that identifies, relates to, describes, or is capable of being associated with you or your household, whether directly or indirectly. In the charts below, we use the following Categories of Personal Information to describe the Personal Information we collect, use, and share about consumers:

Biometric Information

Biometric information, including an individual's physiological, biological, or behavioral characteristics (including DNA) to the extent it can be used to establish individual identity. Biometric information consists of, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template (such as a faceprint, a minutiae template, or a voiceprint) can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

Commercial Information

Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Education Information

An individual's education information, including academic information and records.

Electronic and Sensory Data

Audio, electronic, visual, thermal, olfactory, or similar information (e.g., a recording of a customer service call or profile photograph).

	<p>Financial Information Financial information, including bank account number, credit or debit card number, or other financial information.</p> <p>Identifiers Identifiers, such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p> <p>Inferences Inferences drawn from any of the information listed above to create a profile about an individual reflecting the individual’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. (e.g., predications about an individual’s preferences or tendencies).</p> <p>Health Insurance Information Health insurance information, including an individual’s insurance policy number or subscriber identification number, any unique identifier used by a health insurer to identify the individual, or any information in the individual’s application and claims history.</p> <p>Geolocation Data An individual’s precise geolocation data.</p> <p>Medical Information Medical information, including any information in possession of or derived from a healthcare provider, healthcare service plan, pharmaceutical company, or contractor regarding an individual’s medical history, mental or physical condition, or treatment.</p> <p>Network Activity Data Internet or other electronic network activity information, such as browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p> <p>Professional Information An individual’s professional or employment-related information.</p> <p>Protected Characteristics Characteristics of protected classifications under California or federal law, such as race, gender, physical or mental disability, and religion.</p> <p>Written Signature An individual’s written signature.</p>
Your Rights	<p>If you are a California resident, you have the following rights under the CCPA with respect to your Personal Information:</p> <ul style="list-style-type: none"> • Right to Notice. Before or at the time we collect Personal Information from you, you have the right to receive notice of the Personal Information to be collected and the purposes for which we use it. This Supplemental Notice is intended to satisfy this requirement. You also have the right to request that we disclose to you the categories of personal information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting or selling the personal information, the categories of third parties with whom we shared the personal information, and the categories of third parties with whom we sold the personal information. • Right of Access. You have the right to request that we disclose or provide you with access to the specific pieces of Personal Information we have collected about you in the preceding 12 months. • Right to Deletion. You have the right to request that we delete the Personal Information we collect from you. However, in certain situations we are not required to delete your Personal Information, such as when the information is necessary in order to complete the transaction for which the Personal Information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information. • Right to Opt-Out of the Sale of Personal Information. Tolero does not sell your Personal Information. • Right Not to Be Subject to Discrimination. You have the right to be free from discrimination or retaliation for exercising any of your rights under the CCPA as described above.

	<p>You can exercise your rights by clicking here or calling 888-394-7377 (menu option #5).</p> <p>VERIFICATION: We value the security and confidentiality of your Personal Information. Therefore, if you exercise your right to notice, right of access, or right to deletion, we must first verify your identify to make sure that you are the person about whom we have collected Personal Information. We verify every request carefully. Along with your request, we ask that you provide your email address. We may also ask that you provide us with a scanned copy of you government-issued ID or some other form of identification or residency verification.</p> <p>You may also authorize someone else to submit these requests on your behalf. To do so, you may designate directly with us another person who may act on your behalf by providing us with a notarized copy of power attorney or ask the authorized agent to provide us with a copy of your written permission and a scanned copy of their own government-issued ID.</p>
Contact Us	Submit a form here or call 888-394-7377 (menu option #5) to contact us with questions regarding this Supplemental Notice or to access this Supplemental Notice in an alternative format if you are unable to review or access due to a disability.

Job Applicants: Please click [here](#) for the Job Applicant Privacy Notice

Website Visitors

Categories of PI Collected	Sources of PI	Purposes for Collecting or Sharing PI	Third Parties to Whom We Disclose PI
Identifiers	Directly from you	<ul style="list-style-type: none"> - for our everyday business purposes such as to process your requests, inquiries, or other communications with us - auditing related to current interactions with you including counting ad impressions and unique visitors to our website - to detect security incidents and other fraudulent activity - to monitor and improve our website functionality - to personalize your website experience - to help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business 	<ul style="list-style-type: none"> - Internet service providers - Data analytics providers - Operating systems and platforms - Other service providers
Network Activity Data	Directly from you	<ul style="list-style-type: none"> - for our everyday business purposes such as to process your requests, inquiries, or other communications with us - auditing related to current interactions with you including counting ad impressions and unique visitors to our website - to detect security incidents and other fraudulent activity - to monitor and improve our website functionality - to personalize your website experience - to help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business 	<ul style="list-style-type: none"> - Internet service providers - Data analytics providers - Operating systems and platforms - Other service providers
Protected characteristics	Directly from you	<ul style="list-style-type: none"> - Providing this Privacy Notice and other information forms to you in an accessible format as needed 	We do not disclose this information.

Healthcare Professionals/HCP Staff

Categories of PI Collected	Sources of PI	Purposes for Collecting or Sharing PI	Third Parties to Whom We Disclose PI
Identifiers	Directly from you, government entities, marketing vendors, public records, consumer data resellers	<ul style="list-style-type: none"> - for our everyday business purposes such as to process your requests, inquiries, or other communications with us - Responding to your requests for information about our products and services. - Communicating other information that we think may be of interest to you through our websites, via e-mail, call centers, postal mail and other channels, including communications about our drug development and research programs. - Providing you with a service or taking an action that you request. - Personalizing your website experience or other interactions with Tolero. - Conducting business and marketing research. - Processing and reporting adverse event information and product complaints. - Identifying and engaging scientific experts. - Identifying speakers and invitees to conferences and other scientific and educational programs we host or sponsor. - Determining your potential involvement in future activities with Tolero and contacting you in relation to these activities. - Meeting our contractual obligations to you, if you provide us with services. 	Service Providers (e.g., healthcare agencies, travel and logistics providers, etc.), government entities
Financial information	Directly from you	<ul style="list-style-type: none"> - Meeting our contractual obligations to you, if you provide us with services. - 	We do not disclose this information.
Protected characteristics	Directly from you	<ul style="list-style-type: none"> - Providing this Privacy Notice and other informational forms to you in an accessible format as needed. - Providing reasonable accommodations, as necessary. 	Service Providers (e.g., healthcare agencies, travel and logistics providers, etc.)
Biometric information	Directly from you	<ul style="list-style-type: none"> - Conducting business and marketing research. - Better understanding the market for our existing products and services, and potential new products and services, and to adjust our research, development, and marketing strategies accordingly. - 	Service Providers (e.g., healthcare agencies, etc.)
Electronic and sensory data	Directly from you	<ul style="list-style-type: none"> - Responding to your requests for information about our products and services. - Providing you with a service or taking an action that you request. - Conducting business and marketing research. - Better understanding the market for our existing products and services, and potential new products and services, and to adjust our research, development, and marketing strategies accordingly. 	Service Providers (e.g., healthcare agencies, etc.)
Professional Information	Directly from you, government entities, marketing vendors, public records,	<ul style="list-style-type: none"> - Responding to your requests for information about our products and services. - Communicating other information that we think may be of interest to you through our websites, via e-mail, call centers, postal mail and other channels, including 	Service Providers (e.g., healthcare agencies, travel and logistics providers, etc.), government entities

Categories of PI Collected	Sources of PI	Purposes for Collecting or Sharing PI	Third Parties to Whom We Disclose PI
	consumer data resellers, and other third parties	<p>communications about our drug development and research programs.</p> <ul style="list-style-type: none"> - Providing you with a service or taking an action that you request. - Conducting business and marketing research. - Identifying and engaging scientific experts. - Identifying speakers and invitees to conferences and other scientific and educational programs we host or sponsor. - Determining your potential involvement in future activities with Tolero and contacting you in relation to these activities. - Better understanding the market for our existing products and services, and potential new products and services, and to adjust our research, development, and marketing strategies accordingly. 	
Education Information	Directly from you, government entities, or other third parties -	<ul style="list-style-type: none"> - Identifying and engaging scientific experts. - Identifying speakers and invitees to conferences and other scientific and educational programs we host or sponsor. - Determining your potential involvement in future activities with Tolero and contacting you in relation to these activities. 	Service Providers (e.g., healthcare agencies, travel and logistics providers, etc.), government entities
Written signatures.	Directly from you	<ul style="list-style-type: none"> - Processing contracts and other written agreements into which we may enter with you. - Meeting our contractual obligations to you, if you provide us with services. 	Service Providers (e.g., agency partners, etc.); government entities
Inferences	Directly from you and other third parties	<ul style="list-style-type: none"> - Responding to your requests for information about our products and services. - Conducting business and marketing research. - Identifying and engaging scientific experts. - Identifying speakers and invitees to conferences and other scientific and educational programs we host or sponsor. - Determining your potential involvement in future activities with Tolero and contacting you in relation to these activities. - Personalizing your interactions with Tolero. 	Service Providers (e.g., healthcare agencies, etc.)

Conference/Event/Meeting Attendees

Categories of PI Collected	Sources of PI	Purposes for Collecting or Sharing PI	Third Parties to Whom We Disclose PI
Identifiers	Directly from you and Service Providers on our behalf	<ul style="list-style-type: none"> - Identifying speakers and invitees to conferences and scientific, educational or other programs we host or sponsor. - Determining your potential involvement in future activities with Tolero and contacting you in relation to these activities. - Providing necessary travel and logistical arrangements 	Service Providers (e.g., travel agencies, meeting logistics providers, etc.)
Medical Information	Directly from you and Service	<ul style="list-style-type: none"> - Providing reasonable accommodations as necessary 	Service Providers (e.g., travel agencies,

Categories of PI Collected	Sources of PI	Purposes for Collecting or Sharing PI	Third Parties to Whom We Disclose PI
	Providers on our behalf		meeting logistics providers, etc.)
Protected Characteristics	Directly from you and Service Providers on our behalf	<ul style="list-style-type: none"> - Providing reasonable accommodations as necessary - Providing this Privacy Notice and other informational forms to you in an accessible format as needed. 	Service Providers (e.g., travel agencies, meeting logistics providers, etc.)
Professional Information	Directly from you and Service Providers on our behalf	<ul style="list-style-type: none"> - Identifying speakers and invitees to conferences and scientific, educational or other programs we host or sponsor. - Determining your potential involvement in future activities with Tolero and contacting you in relation to these activities. 	Service Providers (e.g., travel agencies, meeting logistics providers, etc.)