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Privacy Policy ^[1]

Effective December 1, 2017

Thank you for your trust in Navigate BioPharma Services, Inc. ("Navigate BioPharma" "we", "our", or "us"). We are a United States-based affiliate of the Novartis global group (<http://www.novartis.com/> ^[2]), a world leader in healthcare. This Privacy Policy describes how we use and disclose the information we collect from you through our U.S. websites, mobile applications, social media forums, and other services, both offline and online, that link to, incorporate, or for which you are provided a copy of this Privacy Policy (collectively, the "Services"), and the choices you have about how we use that information.

What Information Do We Collect?

- **Information You Provide:** We collect information that identifies you ("Personal Information") when you voluntarily provide it to us when you use the Services. For example, when you register for or use a Navigate BioPharma program or service, participate in a survey, provide a testimonial, order a product, participate in an interactive feature or forum (such as chat features), or contact us with a question, comment, or request. The types of Personal Information that you provide are based on the specific function of the Services that you use or the Navigate BioPharma program or service for which you register, and might include, for instance, your name, address, age, birth date, gender, email address, phone number, photo, social media account number, zip code, education, professional experience, demographic information, information about health and/or medical conditions and specialties. If you submit Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.
- **Information We Receive From Third Parties:** We may combine the Personal Information we collect from you with information that we receive about you from other sources, such as public databases, providers of demographic information, joint marketing partners, social media platforms, people with whom you are connected on social media platforms, and other third parties.

What Information Do We Collect Automatically From Your Device and How Do We Use It?

We and our third party service providers may collect information automatically from your device in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services you are using. We use this information to ensure that the Services function properly.
- **Through your use of an app:** When you download and use one of our apps, we may track

and collect app usage data, such as the date and time the app on your device accesses our servers and the information and files that have been downloaded to the app.

- Using cookies: Cookies are small text files stored directly on your device. We use cookies to collect information such as time spent on the Services, pages visited, the pages you view immediately before and after you access the Services, the search terms you enter, and other anonymous traffic data. Cookies allow us to recognize you and personalize your experience, to facilitate navigation, and to display information more effectively. We also use cookies to gather statistical information about the use of the Services in order to understand how they are used, improve them, and resolve questions about them. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or to be given the choice of declining or accepting cookies from a particular site. You may wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html> ^[3] (link is external). If you do not accept our cookies, you may experience some inconvenience in your use of the Services.

- Using pixel tags and other similar technologies: We may use pixel tags (also known as web beacons and clear GIFs) to, among other things, track the actions of users of the Services and our email recipients, measure the success of our marketing campaigns and compile statistics about usage of the Services and response rates.

- Using Adobe Flash technology (including Flash Local Shared Objects ("Flash LSOs")) and other similar technologies: We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel (link is external). You can also control Flash LSOs by going to the Global Storage Settings Panel (link is external) and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to "information" on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

- IP Address: Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) visited. Collecting IP Addresses is standard practice and is done automatically by many websites, applications and other services. We use IP Addresses for purposes such as calculating usage levels of the Services, helping diagnose server problems, and administering the Services.

- Precise Real-Time Location Information: We may collect precise, real-time information about the location of your mobile device. We may use your device's location to provide you with personalized location-based services and content, including marketing communications. You may be permitted to allow or deny the use of your device's location by managing your location services preferences through your device settings.

How Do We Use Your Information?

In addition to using your Personal Information to deliver the programs, services, products, or information you request, and for the purposes described above, we may also use it:

- to provide customer support;
- to provide you with information about the Services, our other products, programs, or services, your accounts, and notices;

- to deliver marketing communications that may be of interest to you;
- to permit you to participate in polls, surveys, promotions, or other interactive features, such as chat features;
- to personalize your experience and better tailor content to you;
- to facilitate social sharing functionality;
- to allow you to send messages to another person through the Services;
- to help us, our subsidiaries, affiliates, and business partners better understand our audiences, evaluate user interest in the Services, improve the Services, and perform other market research activities;
- for our business purposes, such as data analysis; audits; monitoring and prevention of fraud, infringement, and other potential misuse of the Services; modifying the Services; determining the effectiveness of our promotional campaigns; and operating and expanding our business activities; and
- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use information that does not personally identify you for any purpose, except where we are required to do otherwise under applicable law. We may combine, aggregate, or anonymize any of the information we collect from you with information we may collect from or about you from any other online or offline source.

When and to Whom Do We Disclose Your Information?

The Personal Information we collect from and about you may be disclosed:

- to other subsidiaries and affiliates within the Novartis global group (link is external), for the purposes described in this Privacy Policy;
- to third parties that provide services to us, such as fulfilling requests for information, answering calls, administering programs or projects, assisting in research and development, or delivering advertisements or other communications;
- to business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- to permit a third-party business partner to deliver marketing communications or products that may be of interest to you, subject to any choices you have expressed;
- to identify you to any person to whom you send messages;
- to any person you direct us to contact, such as your designated caregiver(s);
- by you, on message boards, chat, profile pages, blogs, and other services to which you post information and materials. Because any information you post may become public, we urge you to be very careful when deciding to disclose any information on or through the Services;
- to your friends associated with your social media account, to other Services users, and to your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to your Services account or log into your Services account from your social media account. By connecting your accounts, you authorize us to share information with your social media account provider, and you understand that the use of the information we share will be governed by the social media site's own privacy policy;
- as required by law, such as to law enforcement, to health authorities to report possible adverse events, during government inspections or audits, as ordered or directed by courts or

other governmental agencies, or in order to comply with a subpoena or other legal process;

- when we believe in good faith that disclosure is necessary to protect legal rights or the security or integrity of the Services; protect your safety or the safety of others; investigate fraud, a breach of contract, or a violation of law; or respond to a government request; and
- to third parties, advisors, and other entities to the extent reasonably necessary for development of or to proceed with the negotiation or completion of a corporate or commercial transaction, including a reorganization, merger, acquisition, joint venture, sale or other disposition of all or a portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We may disclose information that does not personally identify you for any purpose, except where we are required to do otherwise under applicable law.

Your Choices

Where you have elected to participate in one of our programs or services or to receive marketing communications from us, we may offer you the ability to discontinue your participation or to opt out of receiving those communications in the communication itself, or you can visit our Contact Us page, write to us at Navigate BioPharma Services, Inc., 1890 Rutherford Road, Carlsbad, CA 92008, attention Privacy Office, or email us at Privacy.Officer@navigatebp.com [4].

We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services.

California Residents

If you are a resident of California, under 18 and a registered user of the Services, you may ask us to remove content or information, including your Personal Information, that you have posted to the Services by emailing Privacy.Officer@navigatebp.com [4]. Please note that your request does not ensure complete or comprehensive removal of the content or any information, as, for example, some of your content may have been reposted by another user.

Texas Residents

Pursuant to the Texas Health and Safety Code, Sec. 181.154, please be advised that if Navigate BioPharma receives any information that identifies you and relates to your past, present or future physical or mental health, healthcare or payment for your healthcare, such Personal Information may be subject to electronic disclosure by such means as file transfers or email.

Information Security

We use appropriate technical, administrative, and physical safeguards to protect all information collected through the Services. Unfortunately, no organization can guarantee the absolute security of information, especially information transmitted over the Internet.

Children's Information

We do not knowingly collect Personal Information online from a child under the age of 13 without obtaining prior parental consent, other than to inform the child that we must have parental consent before collecting Personal Information.

Accessing and Updating Your Information

We encourage you to update the Personal Information you provide to us to help us continue to provide information that best meets your needs. You may be able to update this information

through Services, or visit our Contact Us page, write to us at Navigate BioPharma Services, Inc., 1890 Rutherford Road, Carlsbad, CA 92008, attention Privacy Office, or email us at Privacy.Officer@navigatebp.com [4]. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

Links to Third Party Websites

The Services may contain links to third-party services that are not under our control. We are not responsible for the collection and use of your information, including any Personal Information, by such services, and we encourage you to review their privacy policies. In addition, we are not responsible for the information collection, use, disclosure, or security practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including in connection with any information you disclose to such other organizations through or in connection with the Services.

Business Transfer

In the event that all or a substantial portion of the assets, business or stock of Navigate BioPharma are acquired by, merged with or transferred to another party, or in the event that Navigate BioPharma goes out of business or enters bankruptcy, your Personal Information may be one of the assets that is transferred to or acquired by the third party. You acknowledge that such transfers may occur, and that any acquirer of Navigate BioPharma or its assets may continue to use your Personal Information as set forth in this Privacy Policy. If any acquirer of Navigate BioPharma or its assets will use your Personal Information contrary to this Privacy Policy, you will receive prior notice.

Transfer Across Jurisdictions

We are a US-based company so the Personal Information that we collect from you may be transferred to, and stored at, a destination outside of your country and the European Economic Area (“EEA”) and, in particular, the United States, which may have different or less protective privacy laws than those in your country. Personal Information may also be processed by any service providers appointed by us who operate outside the EEA and their staff, and/or our own staff based outside of the EEA. By using the Services and providing Personal Information to us, you consent to such transfer to, and processing in, the United States.

If you have a complaint or dispute regarding this Privacy Policy or our processing of your Personal Information, and you are not satisfied by our response, you have the right to lodge a complaint with a supervisory authority.

Changes to This Privacy Policy

This Privacy Policy became effective on November 30, 2017. We may update it from time to time by posting a new Privacy Policy on our website. You are advised to consult our website regularly for any changes, and your continued use of the Services after such changes have been made constitutes acceptance of those changes.

How to Contact Us

If you have any questions about our Privacy Policy, please visit our Contact Us page, write to us at Navigate BioPharma Services, Inc., 1890 Rutherford Road, Carlsbad, CA 92008, attention Privacy Office, or email us at Privacy.Officer@navigatebp.com [4].

Source URL: <https://www.navigatebp.com/privacy-policy>

Links

[1] <https://www.navigatebp.com/privacy-policy>

[2] <http://www.novartis.com/>

[3] <http://www.allaboutcookies.org/manage-cookies/index.html>

[4] <mailto:Privacy.Officer@navigatebp.com>