

## **Introduction**

This privacy policy (“Policy”) is designed to inform users of the Port Therapeutics web site (the “Site”) about how Port Therapeutics gathers and uses personal information collected by visitors to the Site. BY ACCESSING OR USING THE SITE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND BY THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THESE TERMS, DO NOT USE THE SITE.

We will take reasonable steps to protect user privacy consistent with the guidelines set forth in this policy and with applicable U.S. laws. In this policy, “user” or “you” means any person using or otherwise benefiting from the Site or otherwise submitting personal information to Port Therapeutics.

## **What Information Do We Collect?**

### **Limited Personal Information:**

The website utilizes Google Analytics to collect limited information regarding visitors’ usage of the site. All of this information is referred to in this Policy as “Personal Information”.

Apart from the limited personal information described above, Port Therapeutics does not collect and does not wish to receive any personally identifying information, nor does Port Therapeutics collect or wish to collect any data from individuals under the age of 18.

### **What are the Legal Bases for Our Collection and Use of Personal Information?**

We rely on the following legal grounds to collect and process your Personal Information:

- Performance of a contract – We need to collect and use your Personal Information to perform our agreement with you to deliver the Site as described in this Privacy Policy.
- Consent – We may use or disclose some of your Personal Information as described in this Privacy Policy subject to your consent.
- Legitimate interests – We may use your Personal Information for our legitimate interests to improve our products and services and the Site. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use technical information as described in this Privacy Policy.

## **How Do We Use the Information We Collect?**

### **Personal Information from Google Analytics:**

We use personal information from Google Analytics to administer the Site and to understand how well our Site is working, to store your user preferences, and to develop statistical information on usage of the Site. This allows us to determine which features and content users like best to help us improve our Site, to personalize your user experience, and to measure overall effectiveness.

### **Aggregate Information:**

We will also create statistical, aggregated data relating to our users and the Site for analytical purposes. Aggregated data is derived from Personal Information and User Data but in its aggregated form it does not duplicate or reveal any User Data or relate to or identify any individual.

### **What Information Do We Disclose to Third Parties?**

#### **Personal Information and User Data:**

We will not disclose your Personal Information or User Data to any third parties except as follows:

(i) to third party contractors engaged to provide services on our behalf (“Contractors”), such as performing marketing, analyzing data and usage of the Site, hosting and operating the Site or providing support and maintenance services for the Site, or providing customer service. We enter into agreements with all Contractors that require Contractors to use the Personal Information they receive only to perform services for us; or

(ii) when we have your consent to share the information.

#### **Email Communications:**

If you register and provide your email address, we will send you administrative and promotional emails. If you wish to opt out of these emails, you may do so by emailing [hr@porttherapeutics.com](mailto:hr@porttherapeutics.com).

#### **Network Operators:**

Use of the Site may involve use of the services of third party internet or telecommunications providers. Such providers are not our contractors, and any information that a provider collects in connection with your use of the Site is not “Personal Information” and is not subject to this Privacy Policy. We are not responsible for the acts or omissions of these third parties.

#### **Legal Exception:**

Notwithstanding the above, we may in any event use Personal Information and other information collected through the Site to the extent required by law or legal process, to resolve disputes, to enforce our agreements (including this Privacy Policy), or if in our reasonable discretion use is necessary to protect our legal rights or to protect third parties.

#### **Additional Disclosures:**

We reserve the right to disclose any information we collect in connection with the Site, including Personal Information, (a) to any successor to our business as a result of any merger, acquisition, asset sale or similar transaction; and (b) to any law enforcement, judicial authority, or governmental or regulatory authority, to the extent required by law or if in our reasonable discretion disclosure is necessary to enforce or protect our legal rights or to protect third parties.

## **Your Choices About Your Information**

You have the right to:

- request an accounting of all Personal Information that we possess that pertains to you in an electronically portable format (e.g., electronic copies of information attached to an email).
- request that we change any Personal Information that pertains to you.
- request that we delete any Personal Information that pertains to you.

To request an accounting of your Personal Information, a change to your Personal Information, or deletion of your Personal Information, contact [hr@porttherapeutics.com](mailto:hr@porttherapeutics.com).

If you are a resident of the European Union and have a complaint about our use or processing of your Personal Information, you have a right to lodge a complaint with a national Data Protection Authority. Each European Union member nation has established its own Data Protection Authority; you can find out about the Data Protection Authority in your country here:

[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

If you have consented to the collection, processing, and/or transfer of your Personal Information, you have the right fully or partially to withdraw your consent. To withdraw your consent, please contact [hr@porttherapeutics.com](mailto:hr@porttherapeutics.com). Once we have received notification that you withdraw your consent, we will no longer process your information for the purposes to which you consented unless there are compelling legitimate grounds for further processing or for the establishment, exercise, or defense of legal claims.

## **General**

### **Security:**

We use reasonable security precautions to protect the security and integrity of your Personal Information in accordance with this policy and applicable law. However, no Internet transmission is completely secure, and we cannot guarantee that security breaches will not occur. Without limitation of the foregoing, we are not responsible for the actions of hackers and other unauthorized third parties that breach our reasonable security procedures.

### **Links:**

During the course of using our Site you may encounter links to other websites or services. Port Therapeutics is not responsible for the privacy practices or the content of those websites. Users should be aware of this when they leave our Site and review the privacy statements of each third party website. This Privacy Policy applies solely to information collected by the Site.

### **Amendments:**

Port Therapeutics may modify or amend this policy from time to time. If we make any material changes in the way in which Personal Information is collected, used or transferred, we will notify you of these changes by modification of this Privacy Policy, which will be available for review by you at the Site.

## Geographic Location

We offer the Site in several geographic regions. We define a geographic region as the location where a user is located.

### *Users Within the United States*

For users within the United States, we process data in data centers located in the United States. We have adopted reasonable physical, technical, and organizational safeguards against accidental, unauthorized, or unlawful destruction, loss, alteration, disclosure, access, use, or processing of user data in our possession. We comply with state and federal laws governing the protection of personal information.

### *Users Within the European Union*

For users within the European Union, we transfer data from the European Union to data centers located in the United States for processing. Such processing is performed in accordance with Regulation 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and free movement of such data, known as the General Data Protection Regulation (“GDPR”). This includes the imposition of required safeguards with respect to accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of data. Transfers of European Union user data to processors in the United States are made in accordance with the GDPR.

### *Users in Other Regions*

For users not within the United States or the European Union, we transfer data from such regions to the United States for processing. For such users, we have adopted reasonable physical, technical, and organizational safeguards against accidental, unauthorized, or unlawful destruction, loss, alteration, disclosure, access, use, or processing of user data in our possession that substantially mirror protections available to users located within the United States.

## **Retention and Deletion**

We will only retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

In some circumstances, we may anonymize your Personal Information so that it can no longer be associated with you, at which point it will no longer be treated as Personal Information.

It is our policy to retain Personal Information for until such personal information is no longer necessary to deliver the Site and to delete such personal information thereafter.

## **About Us**

We are based in the United States of America at 1927 Paseo Rancho Castilla, Los Angeles CA 90032. Users in the United States and regions other than the European Union can contact us at the above address.

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