The Healthcare Report, a digital news platform of Marwood Group Advisory, LLC, (collectively "HCR" or "we") are committed to safeguarding your privacy. By using this website, including by providing us with any personally identifiable information, you are accepting and consenting to the practices described in this privacy policy ("Privacy Policy").

HCR operates the following website: healthcarereport.com (the "Site"), which is hosted in the United States. We provide a daily, curated newsletter and website platform that aggregates the top healthcare news and market updates. We also provide digital media placements for companies looking to distribute relevant ad content. Any information received by us through this Site, including personally identifiable information, may be transferred to or shared across our integrated computer networks with one or more of our affiliated offices in other countries that may not be subject to data protections laws similar to those prevailing in the jurisdiction in which such information is provided to or received by us. However, all of our offices adhere to the same procedures with respect to your personally identifiable information, including this Privacy Policy.

This Privacy Policy describes how we collect and use information about visitors to this Site. By using this Site, you acknowledge and consent to our practices described below. The purpose of this Privacy Policy is for you, the user, to understand how we collect and use data related to your Site visit.

In addition, we have updated this Privacy Policy effective as of January 1, , 2020 to adhere to the requirements of the California Consumer Privacy Act of 2018 ("CCPA") and the General Data Protection Regulation ("GDPR") and provide you with further clarification on what personal information we collect and how we use it, the legal basis for our processing of your data, and your corresponding rights under the GDPR and CCPA. Some of the provisions herein relate solely to the requirements under the GDPR and CCPA, and depending upon country of residence, citizen or your location when accessing this Site, may or may not be relevant to you.

### **INFORMATION WE COLLECT**

You may use our Site without disclosing to us any personally identifiable information, such as your name, address, email address, phone number, and certain other information. We collect personally identifiable information about you when you voluntarily sign up for our daily newsletter. Although our web server does log certain technical information automatically, such as the identity of your Internet Service Provider and your computer's IP address, none of this technical information reveals your identity to us, and it is not associated with any personally identifiable information you may choose to provide. Email messages, including associated information contained in attachments to e-mail messages that you send to addresses published on our Site, are not governed by this Privacy Policy. HCR may also collect certain personally identifiable information about you, such as your name, address, email address and phone number, when you communicate with us in person, over the phone, through email or otherwise.

## COOKIES

Cookies are small bits of data cached or stored on your computer based on internet activity. We use cookies and similar technologies to monitor individual activity in aggregate to improve the Site. The information we gather includes IP address, user language, operating system, browser type, presence/absence of "flash" plugins, screen resolution, connection type, and information that identifies the cookie. Our third-party service providers may also use technologies like cookies or usage data to record how you interact with our products and services. However, no other user information is generally collected.

### **USE AND DISCLOSURE OF INFORMATION**

HCR uses personal information: (i) to maintain contact lists for the purposes of sharing our daily newsletter; (ii) to provide goods and services and deliver invoices to clients pursuant to executed agreements; (iii) to communicate with and respond to requests, inquiries and complaints (v) to collect data that analyzes how our users interact with our site and our services; (vi) to comply with applicable laws and regulations and Marwood Group Advisory, LLC's internal policies and procedures; and (vii) for any other relevant purposes relating to HCR's business. We may share information with our affiliated parent company for the purposes described in this policy. We may also share voluntarily collected personal information with our advertising partners for purposes relevant to our business relationship with them. We may use third-party software and services to assist us with collecting, storing and analyzing information for HCR 's purposes listed above. Third-party services include data analytics on how current and prospective clients engage with our marketing and our products and services based on tracking technology that records, on an individual and aggregated basis, email delivery status, email open rates, the products clicked on and the number of times such products are accessed, and geographic location. Third-party service providers

utilized by HCR agree not to disclose or sell any personally identifiable information without HCR's permission, or to use such information for any purpose other than its intended purposes. We may disclose your personally identifiable information if we reasonably believe, in our sole discretion, we are required by applicable law, regulation, legal process or governmental request to do so.

# **OUR LEGAL BASIS FOR PROCESSING DATA**

Depending on the purposes for which HCR uses your personal information, we may collect and process your personal information pursuant to each of the following legal bases described in Article 6 of the GDPR:

**1) Legitimate Interests**: We have a legitimate interest in: (i) marketing, promoting and sharing our products and services that may be of interest to you; (ii) developing, supporting and improving our business, including expanding our client base; and (iii) communicating with prospective and current clients to address and respond to any requests, inquiries and complaints; provided that such interests are not overridden by your interests or fundamental rights and freedoms.

**2) Contract Performance**: We must perform our contractual obligations to clients, including, but not limited to, providing products and services, delivering invoices, and processing payments.

**3) Consent**: You have expressly given us consent to process your personal information for one or more specific purposes, in which case you may withdraw such consent at any time. Withdrawing your consent does not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**4) Legal Obligations**: We must comply with laws, regulators, court orders, or other legal obligations, or pursuant to legal process.

# DATA RETENTION

HCR aims to retain your personal information for only as long as it is necessary for us to do so for the purposes for which we are using it and in line with our internal policies and procedures. In some circumstances, it may be necessary to keep your information for a longer time period for purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal information, HCR considers the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## For European Economic Area (EEA) AND SIWTZERLAND RESIDENTS YOUR RIGHTS UNDER THE GDPR

The GDPR sets forth a number of rights that you may exercise with respect to the processing of your personal information, subject to certain limitations and exceptions, which include, but are not necessarily limited to:

**1) Right of access**: You have the right to confirm whether your personal information is being processed, to receive information about that processing and to have a copy of the personal information provided to you.

2) **Right to rectification**: You may correct or revise any of your personal information that is incorrect or incomplete.

**3) Right to erasure/Right to be forgotten**: Under certain circumstances, you may request the deletion or removal of your personal information.

**4) Right to restrict processing**: Under certain circumstances, you may request limited use of your personal information.

**5) Right of portability**: Under certain circumstances, you may receive your personal information in a structured, commonly used and machine-readable format.

**6) Right to object**: You may object to your personal information being used for direct marketing or certain other purposes.

Pursuant to this Privacy Policy, you may opt out of receiving emails from HCRat any time by unsubscribing, changing your email preferences or requesting removal from our contact lists.

# FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act of 2018 ("CCPA") sets forth a number of rights that you may exercise with respect to the processing of your personal information, subject to certain limitations and exceptions, which include but are not necessarily limited to:

**1) Right of access:** you have a right to request disclosure of the categories and specific pieces of personal information we have collected about you. If you would like to submit a request, please contact our data protection officer whose contact information is listed below.

**2) Right to request deletion**: you have the right to request we delete personal information that we have collected about you, subject to certain limitations and exceptions as noted in the CCPA.

**3) Right to request disclosure of information collected or shared**: you have the right to request details relating to (i) the categories of personal information collected about you, (ii) the categories of sources from which the Personal Information is collected, (iii) the business purpose for collecting and selling personal information, (iv) the categories of third parties with whom we share personal information with, and (v) specific pieces of personal information collected about you.

**4) Right to Disclosure of Categories of Information Sold:** you have the right to request that if we sell your personal information or disclose it for a business purpose, we must provide an itemized list of the categories of the personal information (i) collected, (ii) sold about you, and (iii) disclosed about you for a business purpose.

**5) Right to opt out of the sale of Personal Information:** you have a right at any time to opt out the sale of your Personal Information. If you would like to opt-out please click here: <u>Do Not Sell My Personal Information</u> or please contact our data protection officer whose contact information is below.

**6) Right to Nondiscrimination:** we will not discriminate against you if you exercise your rights under the CCPA.

### **CHANGES TO THIS POLICY**

This Privacy Policy is effective as of January 15, 2020. We reserve the right to modify this Privacy Policy at any time. Any material changes to this Privacy Policy will be published on our Site. By your continued use of the Site, you consent to the terms of any revised Privacy Policy.

## LINKS TO OTHER WEBSITES

Our Site contains links to websites maintained by outside organizations. Please be aware that these third-party websites are governed by their own privacy policies and do not fall within this Privacy Policy. Our firm is not responsible for the content or policies maintained by these websites. Please familiarize yourself with the privacy policy of any third-party website you visit, as it will govern any information you submit through that website.

### SECURITY

HCR will take reasonable steps to protect personal information from loss, misuse and unauthorized access, disclosure, alteration, and destruction. Marwood has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information from loss, misuse, unauthorized access or disclosure, alteration, or destruction. Please do not disclose any private or confidential information to us via email or this Site. Third-party service providers utilized by HCR are also required to employ reasonable industry-recognized technical, administrative and physical safeguards, such as firewalls, to protect the confidentiality and security of your personal information, and to adopt and implement security procedures to protect your information from loss, misuse or unauthorized alteration. HCR cannot guarantee the security of information on or transmitted via the Internet.

### DATA INTEGRITY

HCR will only process personal information in a way that is compatible with and relevant to the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, Marwood will take reasonable steps to ensure that personal information is accurate, complete, current, and reliable for its intended use.

### **NO CONTRACT**

Nothing contained in this Privacy Policy creates or is intended to create a contract or agreement between us and any candidate visiting this Site or providing identifying information of any kind.

## **CONTACT INFORMATION**

HCR has appointed a Data Protection Officer to oversee compliance with its data protection obligations. If you have questions or comments about this Privacy Policy or our use of your personal information, please contact the Data Protection Officer at privacy@marwoodgroup.com.

You also have the right to lodge a complaint with your national data protection supervisory authority at any time if you believe that Marwood is using your information in a way that breaches data protection law, including the GDPR. The United Kingdom supervisory authority for data protection issues is the Information Commissioner's Office.