

Privacy Policy

Last Updated May 2023

Purpose of Global Privacy Policy Marco Growth Partners, Inc. (“Marco Growth Partners”, “Conquering Health”, “Conquering Psoriasis”, “Conquering Rheumatoid Arthritis”, “we,” or “us”)

is committed to protecting your information. To that end, we want you to be familiar with how we process your information. Our Global Privacy Policy (“Privacy Policy”) outlines how we collect, use, and disclose information through: our website, located at <https://www.conqueringhealth.org> clinical trials; social media pages that we control, from which you are accessing this Privacy Policy (“Social Media Pages”); HTML-formatted email messages that we send to you that link to this Privacy Policy or other communications with you; and other offline interactions you have with us. Collectively, we refer to the website, Social Media Pages, emails, and offline business interactions as the “Services.”

Table of Contents

Personal and Other Information We Collect and How We Collect It

How We Use and Process Your Information

Disclosure of Your Information

Interest-Based and Third-Party Advertising

Transfer and Storage of Your Information

Data Retention

Security

Sensitive Information

Children

Your Choices Regarding Direct Marketing

Your Rights

External or Third-Party Links

Changes to the Privacy Policy

How to Contact Us

Additional Information Regarding EEA and UK

Additional Information Regarding California

Personal and Other Information We Collect and How We Collect It

Personal Information

As used in this Privacy Policy, “Personal Information” means any information that can be used to identify you as an individual or is reasonably linkable, directly or indirectly, to a specific natural person. The Services collect the following kinds of Personal Information: name, address, telephone number, email address, other contact information, resume and cv information provided in a job application, health-related information and IP address.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any 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.

We and our service providers collect Personal Information in a variety of ways, including through the services generally; through the job application process; and from other sources.

Through the Services and Registering Interest in a Clinical Trial

We collect Personal Information through the Services, for example, when you register interest in or sign up for a clinical trial, register an account to access the Services, attend one of our events, or sign up for a newsletter.

If you enroll in a Conquering Psoriasis clinical trial, you will receive detailed information about data processing – including the collection of Personal Information – during the initiation of the clinical trial process.

Job Opportunities

If you apply for jobs through our website, your application and any additional information that you provide may be used to assess your skills and interests against career opportunities, and for reporting purposes that may be required by country-specific laws. We may also use your information to communicate with you and to inform you of career opportunities.

Other Sources

We receive your Personal Information from other sources, for example publicly available databases, clinical trial recruiting partners and joint marketing partners, when they share the information with us.

Other Information

“Other Information” refers to any information that does not reveal your specific identity or does not directly relate to an identifiable individual, and includes information such as the type of Internet browser and operating system used; domain name of the website from which you came; number of visits; average time spent on the site; and pages viewed. We may use Other Information, for example, to monitor the relevancy of our website and improve its performance or content.

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

We collect Other Information in a variety of ways, including from your browser or device; cookies; clear gifs/ web beacons; analytics; software development kits (“SDKs”) and mobile advertising IDs; third-party plugins; third-party online tracking; Adobe Flash technology; physical location.

From 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 Mac), 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.

Cookies (Information Stored Automatically on Your Computer)

We use cookies on our website. Cookies are small files that are stored on your computer by your web browser. A cookie allows our website to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect or store information about your use of our website during your current session and over time (including the pages you view and the files you download), your computer's operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before the website, and the link you used to leave our website. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the website may not operate correctly.

For detailed information regarding use of cookies, please refer to the Cookie Policy.

Clear Gifs

We employ a software technology called clear gifs (also known as web beacons, web bugs, or pixel tags) along with other technologies such as e-tags and JavaScript that help us better manage content on our site by

informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies that are used to track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs, which are about the size of a period, are embedded invisibly on web pages. We do not tie the information gathered by clear gifs, e-tags, or JavaScript to our users' Personal Information. For detailed information regarding our use of clear gifs and other technologies, please refer to the Cookie Policy.

Analytics

We partner with certain third parties to obtain the automatically collected information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device. In particular, the website uses Google Analytics to help collect and analyze certain information for the purposes discussed above. You may opt out of the use of cookies by Google Analytics.

SDKs and Mobile Advertising IDs

Our Services may include third-party SDKs that allow us and our service providers to collect information about your activity. In addition, some mobile devices come with a resettable advertising ID (such as Apple's IDFA and Google's Advertising ID) that, like cookies and pixel tags, allow us and our service providers to identify your mobile device over time for advertising purposes.

Third-Party Plugins

Our website may include plugins from other companies, including social media companies (e.g., the Facebook “Like” button). These plugins may collect information, such as information about the pages you visit, and share it with the company that created the plugin even if you do not click on the plugin. These third-party plugins are governed by the privacy policies and terms of the companies that created them.

Third-Party Online Tracking

We also may partner with certain third parties to collect, analyze, and use some of the information described in this section. For example, we may allow third parties to set cookies or use web beacons on the website or in email communications from us. This information may be used for a variety of purposes, including online website analytics and interest-based advertising. Please see the section below titled “Analytics and Interest-Based Advertising” to learn more about this use.

Aggregated and Deidentified Information

From time to time, we may also collect and share aggregated or deidentified information about users of the Services. Such aggregated or deidentified information will not identify you personally.

How We Use and Process Your Information

We and our service providers use the Personal Information that we collect for the following purposes:

- Providing the functionality of the Services and fulfilling your requests.

- To provide the Services' functionality to you, such as arranging access to your registered account; conducting clinical trials; responding to your questions or requests concerning the Services; or to provide customer service.
- To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints about our Services.
- To complete your transactions, verify your information, and provide you with related benefits, or customer service.
- To send administrative information to you, such as changes to our terms, conditions, and policies, and to fulfill the terms of any agreement you have with us.
- To deliver confirmations, account information, notifications, and similar operational communications.
- To allow you to send messages to another person through the Services if you choose to do so.

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- Providing you with our newsletter and/or other marketing materials and facilitating social sharing.
 - To send you marketing-related emails, with information about our Services and other topics that are likely to be of interest to you, including newsletters, updates, or other communications, including emails.
 - To facilitate social sharing functionality that you choose to use.

We will engage in this activity with your consent or where we have a legitimate interest.

- Analyzing Personal Information for business reporting and providing personalized services.
 - To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our Services.
 - To improve the user experience and quality of our products and Services generally, including by improving the website and enhancing users' experiences with the website.
 - To better understand your interests and preferences, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
 - To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.

We will provide personalized services based on our legitimate interests, and with your consent to the extent required by applicable law.

- Aggregating and/or anonymizing Personal Information.
 - We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual.
- Accomplishing our business purposes.
 - For data analysis, for example, to improve the efficiency of our Services (e.g., enabling additional website analytics and research concerning the Services).
 - For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements.

- For fraud prevention and fraud security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.
- For developing new products and services or improving our existing Services.
- For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures.
- For identifying usage trends, for example, understanding which parts of our Services are of most interest to users (e.g., to count and recognize visitors to the website and to analyze how visitors use the website and various website features).
- For determining the effectiveness of our recruiting campaigns, so that we can adapt our campaigns to the needs and interests of our users.
- For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.
- To comply with legal and/or regulatory requirements.
- To manage our business.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

We may link information gathered through the website with information that we collect in other contexts. But in that event, we will handle the combined information in a manner consistent with this Privacy Policy.

Disclosure of Your Information

We disclose Personal Information to third parties who support our clinical trials; other third-party service providers; and via other means. You also may disclose your Personal Information yourself.

Clinical Trials

We may disclose Personal Information that we collect or that you provide to us to third parties we use to support our clinical trials or other services as described in the Privacy Policy. Any such third party is bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.

Third-Party Service Providers

We uses third-party service providers that perform services on our behalf, including webhosting companies, mailing vendors, and analytics providers. These service providers may collect and/or use your information, including information that identifies you personally, to assist us in achieving the purposes discussed above.

We may share your information with other third parties when necessary to fulfill your requests for services; to complete a transaction that you initiate; to meet the terms of any agreement that you have with us or our partners; or to manage our business.

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, in particular when we have a legal obligation or legitimate interest to do so, including:

- To comply with a court order, law, or legal process, including to respond to a government or regulatory request, which could include laws outside of your country of residence.
- To cooperate with public and government authorities, including to respond to a request or to provide information we believe is necessary or appropriate (these can include authorities outside of your country of residence).
- To cooperate with law enforcement, including, for example, when we respond to law enforcement requests and orders or provide information we believe is important.
- For other legal reasons, including to enforce our terms and conditions or to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- In connection with a sale or business transaction. We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Your Own Disclosures

By using the Services, you may elect to disclose Personal Information. This includes disclosure via message boards, chat, profile pages, blogs, and other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public. This also includes disclosure through your social sharing activity.

Interest-Based and Third-Party Advertising

The website also enables third-party tracking mechanisms to collect information about you and your computing devices for use in online interest-based advertising. For example, third parties, such as Facebook, may use the fact that you visited our website to target online ads to you. In addition, our third-party advertising networks might use information about your use of our website to help target advertisements based on your online activity in general. For information about interest-based advertising practices, including privacy and confidentiality, visit the Network Advertising Initiative website or the Digital Advertising Alliance website.

The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies, and not this Privacy Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer or other device, you may set your browser to block cookies. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by opting out, or of companies participating in the Digital Advertising Alliance by opting out. Although our website currently does not respond to "do not track" browser headers, you can limit tracking through these third-party programs and by taking the other steps discussed above.

You may also visit our Cookie Policy to learn more about how we use cookies and about how you can adjust your cookie preferences.

Transfer and Storage of Your Information

We are headquartered in Indian Rocks Beach, Florida, in the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

If you have any privacy-related questions about the transfer or storage of your Personal Information please contact us at Connect@Conqueringpsoriasis.org.

Data Retention

We retain your personal information for the length of time needed or permitted in light of the purpose(s) for which it was obtained, as outlined in this Privacy Policy, and/or in accordance with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or

- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Security

We are committed to protecting the Personal Information you share with us.

We seek to utilize a combination of reasonable security technologies, procedures, and organizational measures to help protect your Personal Information from unauthorized access, use, or disclosure. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “How to Contact Us” section below.

Sensitive Information

Except where we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Services or otherwise to us.

Children

Our Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Information from individuals under 16 without seeking and acquiring consent from the minor's parent or legal guardian, if required by applicable law.

Your Choices Regarding Direct Marketing

We give you choices regarding our use and disclosure of your Personal Information, including for marketing purposes.

If you do not want to receive emails from us in the future, you may unsubscribe at any time by clicking on the "unsubscribe".

We do not share Personal Information with third parties for their direct marketing purposes without your consent.

We will try to comply with your request(s) as soon as reasonably practicable and consistent with applicable law. Please note that if you opt out of receiving marketing related emails from us, we may still send you important administrative messages, from which you cannot opt out.

Your Rights

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to or opt out of the processing of Personal Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), please contact us using the contact information at the end of this Privacy Policy. We will respond to your request consistent with applicable law. If you are a California resident, please refer to the “Additional Information Regarding California” section at the end of this Privacy Policy for more information about the requests you may make under the CCPA .

In your request, please make clear what Personal Information you would like to have changed or whether you would like to have your Personal Information suppressed from our database. 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. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes.

If you withdraw or are withdrawn from a clinical trial, we will not collect or receive any new information from the Services. However, information already collected, processed, and stored up to the time that your withdrawal request is received may not be deleted, and may continue to be used for the clinical

trial's purpose, including compliance with regulatory requirements, unless applicable law requires otherwise.

External or Third-Party Links

This website may contain links to third-party websites. If you use these links, you will leave the website. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply our endorsement of the linked site or service.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or 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 with respect to any Personal Information you disclose to other organizations through or in connection with our Social Media Pages. If you decide to access any of the third-party sites listed on our website, you do so at your own risk.

Changes to the Privacy Policy

We may make changes to the website in the future and, as a consequence, we will need to revise this Privacy Policy to reflect those changes. We will

post all such changes on the website, so you should review this page periodically. Any changes will become effective when we post the revised Privacy Policy on the Services.

How to Contact Us

If you have any questions or comments about the Marco Growth Partners Global Privacy Policy, please contact us at enroll@conqueringhealth.org.

Additional Information Regarding California

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), we are providing the following additional details regarding the categories of Personal Information that we collect, use, and disclose about California residents.

Collection, Disclosure of Personal Information

The following chart includes: (1) the categories of Personal Information, as listed in the CCPA, that we plan to collect and have collected and disclosed within the preceding 12 months; and (2) the categories of third parties to which we disclosed Personal Information for our operational business purposes within the preceding 12 months.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
Identifiers, such as name, alias, contact information, unique personal identifiers, online identifiers	service providers; business partners; legal authorities
Internet or network activity information, such as browsing history, search history and interactions with our online properties or ads	service providers

Sales of Personal Information

Under the CCPA, if a business sells Personal Information, it must allow California residents to opt out of the sale of their Personal Information. We do not “sell” Personal Information. We do not sell the Personal Information of minors under 16 years of age.

Sources of Personal Information

We collect this Personal Information as described above, including from you when you contact us through the Services.

Use of Personal Information

We may use this Personal Information to operate, manage, and maintain our

business, to provide our products and services, and to accomplish our business purposes and objectives, including, as described above.

CCPA Rights and Requests

Subject to certain limitations and exceptions, California residents may make the following requests:

1. Request Correction: The right to correct inaccurate Personal Information that we have about You.
2. Request Limitation: The right to limit the use and disclosure of Sensitive Personal Information collected about You.
3. Request to Know: You may request that we disclose to you the following information covering the 12 months preceding your request:
 1. The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 2. The specific pieces of Personal Information we collected about you;
 3. The business or commercial purpose for collecting (if applicable) Personal Information about you; and
 4. The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).
4. Request to Delete: You may request that we delete Personal Information we collected from you.

To make a request, please contact us at [888-307-2116](tel:888-307-2116)

or in accordance with the “How to Contact Us” section above. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you,

such as your name, email address or phone number, in order to verify your identity and protect against fraudulent requests. You may make a request on behalf of a child who is under 13 years old if you are the child's parent or legal guardian. If you make a Request to Delete, we may ask you to confirm your request before we delete your Personal Information.

If you want to make a Request to Know or a Request to Delete as an authorized agent on behalf of a California resident, you may use the submission methods noted above. As part of our verification process, we may request that you provide, as applicable, proof concerning your status as an authorized agent, which also may include:

1. Proof of your registration with the California Secretary of State to conduct business in California;
2. Proof of a power of attorney from the resident pursuant to Probate Code sections 4121-4130.

If you are an authorized agent and have not provided us with a power of attorney from the resident pursuant to Probate Code sections 4121-4130, we may also require the resident to:

1. Verify the resident's own identity directly with us; or
2. Directly confirm with us that the resident provided you permission to make the request.

Right to Non-Discrimination

You have the right to be free from unlawful discriminatory treatment for exercising your rights under the CCPA.

Marco Growth Partners Study Information Terms & Conditions for SMS/Texting Services

Marco Growth Partners, Inc. (“Marco Growth Partners”, “Conquering Health”, “Conquering Psoriasis”, “Conquering Rheumatoid Arthritis”, “we,” or “us”)

You do not need to agree to receive marketing text messages in order to participate our clinical study. If you do agree, you can revoke such consent at any time and by any reasonable means, as described below.

A. Consent for SMS/Texting Services

If you consent to receive information about clinical studies which may include information about how to participate, and/or other information via text and/or SMS to your mobile device, you may receive up to 5 text and/or SMS messages per month if you sign up for a specific study; otherwise text

messages will be sent periodically when new studies are available and may be of interest to you.

While we do not charge to send or receive text messages, messages and data rates may apply. Please consult with your wireless carrier for applicable text messaging fees.

Supported mobile service providers include: Verizon Wireless, Sprint, Nextel, Boost, T-Mobile®, AT&T, MetroPCS, CellCom, C-Spire Wireless, Carolina West Wireless, U.S. Cellular, Google Voice, Cellular One of ECI, Golden State Cellular, Northwest Missouri Cellular, SRT Wireless, Chariton Valley Cellular, IOWA Wireless, Panhandle TelecomS Systems, Texas RSA 3 Ltd, Chat Mobility USA, Illinois Valley Cellular, Peoples Wireless, Thumb Cellular, Copper Valley, Immix, Pine Belt Wireless, Union Telephone Co., Coral Wireless (Mobi PCS), Inland Cellular Telephone Co., Pine Cellular, United Wireless, Cross Telephone Company, Leaco, Revol Wireless USA, Viaero Wireless, Duet IP, Mosaic, RINA, West Central Wireless, Element Mobile (Flat Wireless), MTA Communications, Sagebrush Cellular (Nemont), Epic Touch (Elkhart Telephone), MTPCS, SI Wireless/Mobile Nation, GCI Communications Corp, Nex-Tech Wireless, SouthernLinc. Please note T-Mobile is not liable for delayed or undelivered messages.

Alerts sent via text/SMS may not be delivered if the mobile phone is not in range of a transmission site, or if sufficient network capacity is not available at a particular time. Even within a coverage area, factors beyond the control of the wireless operator may interfere with message delivery, including the

customer's equipment, terrain, proximity to buildings, foliage, and weather. Wireless operators do not guarantee message delivery and will not be held liable for delayed or undelivered messages.

We will not be liable for any delays in the receipt of any SMS message as delivery is subject to effective transmission from your network operator.

We may modify or terminate our messaging services from time to time, for any reason and without notice, including the right to terminate text messaging without notice, without liability to you, any other user or a third party.

B. SMS Opt-In and Opt-Out

When you opt-in to our Info text alerts, we will send you a message to confirm your signup. You may receive up to 5 messages per month. By opting-in, you consent to the receipt of recurring messages from us and/or its service provider and such messages may be sent using an automatic telephone dialing system. Standard message and data rates apply.

To cancel such text messaging, text "STOP" to cancel/opt-out. You expressly consent to receipt of a text message to confirm your "STOP" request.

For help or information regarding text messaging, contact our Customer Service at [888-307-2116](tel:888-307-2116)

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Data Collection and Privacy Policy

Text messaging originator opt-in data and consent will not be shared with any third parties. For information on other data collection practices, please read our Privacy Policy.

Web-based and Mobile Application Platform Privacy Policy

Introduction

Marco Growth Partners, Inc. (“Marco Growth Partners”, “Conquering Health”, “Conquering Psoriasis”, “Conquering Rheumatoid Arthritis”, “we,” or “us”) is committed to protecting your information. To that end, we want you to be familiar with how we process your information on our Web-based and/or Mobile Application Platform (“Platform”), which we provide to facilitate participation in clinical trials. This Platform Privacy Policy (“Privacy Policy”) outlines how we collect, use, and disclose information that you provide during your interactions with the Platform. This is separate from the data handling practices outlined by the sponsor in the Informed Consent Form.

Sponsors make important decisions on what Personal Information is collected and how your Personal Information is used and disclosed as part of a clinical trial. For more information about how your Personal Information is handled in the clinical trial, your data protection rights, and whom to contact with any

questions about the clinical trial, please refer to the confidentiality section of the relevant Informed Consent Form.

As used in this Privacy Policy, “Personal Information” means any information that can be used to identify or is reasonably linkable, directly or indirectly, to a specific natural person.

Information We Collect About You

We collect the following Personal Information when requested by the sponsor to create Platform user accounts:

- Your name and email address
- Your language preference and time zone

How We Collect Your Personal Information

We will collect information from you when you complete forms on the Platform. We may also collect information when you correspond with us (for example, by email) and when you report a problem with the Platform.

We need to collect Personal Information to provide the requested Platform services to you. If you do not provide the information requested, we may not be able to provide the Platform services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Platform, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

How We Use and Disclose Personal Information

Use

We use the Personal Information that we collect for the legal, contractual, and

business purposes associated with your participation in the clinical trial. This includes, for example, the collection of Personal Information for service-related purposes (such as optimizing your user experience and maintaining the security of the Platform), supporting compliance (your location can determine what laws or regulations apply to you), and providing language preference customizations.

We and our service providers use Personal Information for the following purposes:

- Providing the Platform functionality and fulfilling your requests.
- To provide the Platform's functionality to you, such as arranging access to your registered account, and providing you with related customer service.
- To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise; for example when you send us questions, suggestions, compliments, or complaints.
- To send administrative information to you, such as changes to our terms, conditions, policies, and changes to the Platform.

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- Accomplishing our business purposes.
- To administer and protect the security of the Platform, including troubleshooting, data analysis, and system testing.
- For data analysis; for example, to assess trends about Platform use, to improve the efficiency of the Platform.
- For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements.
- For fraud prevention and fraud security monitoring purposes; for example, to detect and prevent cyberattacks or attempts to commit identity theft.
- For developing new products and services.

- For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

- Aggregating and/or anonymizing Personal Information.
- We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual. For example, we may aggregate overall usage data to identify trends about how Platform users access a specific Platform feature to inform future improvements.

Disclosure

Personal Information may be disclosed to our third-party service providers, to facilitate the services they provide to us. These can include providers of services such as website hosting, data analysis, fraud prevention, information technology, and related infrastructure provision, customer service, email delivery, auditing, and other services.

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, and without your specific consent, in particular when we have a legal obligation or legitimate interest to do so, including:

- To comply with a court order, law, regulation, or legal process, including to respond to a government or regulatory request, which could include laws outside of your country of residence.

- To cooperate with public and government authorities, including to respond to a request or to provide the information we believe is necessary or appropriate (these can include authorities outside of your country of residence).
- To cooperate with law enforcement, including, for example, when we respond to law enforcement requests and orders or provide the information we believe is important.
- For other legal reasons, including to enforce our terms and conditions or to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- In connection with a sale or business transaction. We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Other Information

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. The Platform collects Other Information such as:

- Browser and device information
- App usage data
- Information collected through pixel tags and other technologies
- Information that has been aggregated in a manner such that it no longer reveals your specific identity

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Policy. In some instances, we may combine Other Information with Personal Information. If we do, we will treat

the combined information as Personal Information.

Transfer and Storage of Personal Information

We are headquartered in Indian Rocks Beach, Florida, in the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Platform you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your Personal Information.

Additional Information Regarding the EEA, Switzerland, and UK

Some non-EEA countries are recognized by the European Commission, Switzerland, and the UK as providing an adequate level of data protection according to their standards (the full list of countries with adequate protection is available [here](#)). For transfers from the EEA, Switzerland, and the UK to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your Personal Information. You may obtain a copy of these measures by contacting us in accordance with the “How to Contact Us” section below.

If you have any privacy-related questions about the transfer or storage of your

Personal Information please contact us at Connect@conqueringpsoriasis.org

Data Security

We are committed to protecting the Personal Information you share with us. We seek to utilize a combination of reasonable security technologies, procedures, and organizational measures to help protect your Personal Information from unauthorized access, use, or disclosure. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the *“How to Contact Us”* section below.

Data Retention

We retain your personal information for the length of time needed or permitted in light of the purpose(s) for which it was obtained, as outlined in this Privacy Policy, and/or in accordance with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Platform to you (for example, for the length of the study in which you are participating);
- Whether there is a legal obligation to which we are subject; or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

Your Rights

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to or opt-out of the processing of Personal

Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), please contact us using the contact information at the end of this Privacy Policy. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed or whether you would like to have your Personal Information suppressed from our database. 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. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

If you withdraw or are withdrawn from a clinical trial, we will not collect or receive any new information from the Platform. However, information already collected, processed, and stored up to the time that your withdrawal request is received and processed may not be deleted, and may continue to be used for the clinical trial's purpose, including compliance with regulatory requirements, unless applicable law requires otherwise.

Changes to the Privacy Policy

We may make changes to the Platform and, as a consequence, we will need to revise this Privacy Policy to reflect those changes. We will post all such changes to this Privacy Policy on our website, so you should review this page periodically. Any changes will become effective when we post the revised Privacy Policy on our website.

How to Contact Us

enroll@conqueringhealth.org or 888-307-2116

Cookie Policy

Marco Growth Partners, Inc. (“MGP,” “Conquering Health”, “Conquering Psoriasis”, “Conquering Rheumatoid Arthritis”, “we,” “us”, “the company”)

- How we uses Cookies
- What are Cookies?
- How we collect and use other information?
- How long do Cookies stay on devices?
- Who puts the Cookies on devices?
- How do we use online and mobile advertising?
- How do I manage Cookies?
- Our Compliance with Cookie laws and regulations
- Privacy with uo
- How to contact us

How we Uses Cookies

This Cookie Policy describes how we use cookies or similar technologies (such as pixel tags, web beacons, clear GIFs, JavaScript, and local storage). We refer to these cookies and similar technologies simply as “Cookies” throughout this Policy. We also describe what options you may have regarding those Cookies. This Policy covers our use of Cookies that may be used in connection with the websites (including mobile websites and apps) owned and controlled by our (the “Sites”).

In some cases, we may use Cookies to collect information that is defined as personal data, or that can become personal data if we combine it with other information. In such cases, our Global Data Privacy Policy will apply in addition to this our Cookie Policy.

What are Cookies?

Cookies are small files, usually consisting of letters and numbers, placed on your computer, tablet, phone, or similar device, when you use that device to visit a website. Cookies are widely used by website owners to make their websites operate more efficiently and provide analytical information.

These are the different types of Cookies we and our service providers may use on our Sites:

- **Strictly necessary Cookies.** These Cookies are required for the operation of our Sites (for example, to enable you to log into secure areas of our website). These Cookies enable you to move around the Sites and use their features. Disabling these Cookies will encumber the Sites’ performance and may make some of the features and services unavailable.

- Analytical and performance Cookies. These Cookies allow us to analyze activities on our Sites and on other sites where we post content in order to improve and optimize the way our Sites work. For example, we may use these types of Cookies to ensure that visitors can easily find the information they are looking for on our Sites. One way we do this is to recognize and count the number of visitors and see how they move around our Sites when they are using it. Analytics Cookies also help us measure the performance of our advertising campaigns in order to help us improve our advertising campaigns and to optimize our Sites' content for those who engage with our advertising.
- Functionality Cookies. These Cookies are used to recognize you when you return to our Sites. This enables us to personalize our content for you, greet you by name, and remember your preferences (for example, your choice of language or region).
- Targeting Cookies. These Cookies record your online activities, including your visits to our Sites, the pages you have visited, and the links and advertisements you have clicked. One purpose of this is to help make the content displayed on our Sites more relevant to you. Another purpose is to allow us to deliver advertisements or other communications to you that are designed to be more relevant to your apparent interests. (When we do so, this also involves partners such as publishers, data management platforms, and demand side platforms that help to manage the data). For example, if you look at one page on one of our Sites, we may cause an advertisement to be delivered to you, on our Sites or on other sites, for products referenced on that page or for similar products and services. We may also append other data to information collected by these Cookies, including information obtained from third parties, and share this information with third parties for the purpose of delivering ads to you.

How do we Collect and Use Other Information?

We may use Cookies for a variety of purposes, including to:

- Help us obtain information about your visits to the Sites;
- Process your interest in our clinical trials;

- Analyze your visiting patterns to improve our Sites;
- Deliver advertising, communications, social features, and content from us and third parties, on our Sites and those of third parties, specific to your interests;
- Remember your language and other preferences;
- Help you obtain information you are looking for;
- Provide a safe and secure service for online interaction;
- Measure how many people use our Sites, and how they use them, to keep our Sites running efficiently and to better understand our Sites' audiences.
- If you register on one of our Sites or otherwise provide us with your personal information, we may associate that information with other information we collect from or about you or that you provide, information regarding your use of our Sites, or information we receive from or about you from third parties. We will use this combined data for marketing and analytics purposes.

How long do Cookies stay on devices?

Some of our Cookies operate from the time you visit one of our Sites to the end of that particular web-browsing session. These Cookies expire and are automatically deleted when you close your internet browser. These Cookies are called “session” Cookies.

Some Cookies will stay on your device between browsing sessions. They do not expire when you close your browser. These Cookies are called “persistent” Cookies. The length of time a persistent cookie stays on your device varies from cookie to cookie. We and others use persistent Cookies for a variety of purposes, such as to store your preferences so that they are available for the next visit, and to keep a more accurate account of how often you visit our Sites, how often you return, how your use of the Sites may vary over time, and the effectiveness of advertising efforts.

Who puts the Cookies on devices?

Cookies may be placed on your device by us as the Site operator. These Cookies are called “first party” Cookies. Some Cookies may be placed on your device by a party other than us. These Cookies are called “third party” Cookies. For example, we or sponsor may place a third-party cookie to enable relevant information exchange.

Cookies may also be used that allow us to know when you visit our Sites, and to understand how you interact with emails, advertisements, or other content. Through Cookies, aggregate and other information not considered to be personal data (such as your operating system, browser version, and the URL you came from, including from emails and advertisements) may be obtained and used to enhance your experience and understand traffic patterns. This technology counts the number of users who visit a particular service from specific banner advertisements outside our Site or who clicked on links or graphics included in email newsletters received from us. It is also used as a tool to compile aggregated statistics about how our Sites are used, to perform analytics and help us to optimize our Sites, and to help serve you advertising based on your interests, as described in further detail below.

How do we Use Online and Mobile Advertising?

We engage in interest-based advertising to deliver advertisements and personalized content that we believe will be of interest to you. To the extent third party vendors are using Cookies to perform these services for us, we do not control the use of this technology or the resulting information and are not responsible for any actions or policies of such third parties.

Ads may be delivered to you based on your online or mobile behavior (on our Sites and others not ours), your search activity, your responses to one of our advertisements or emails, the pages you visit, your general geographic location, or other information. These ads may appear on our Sites or on third party websites.

How do I Manage Cookies?

You can decide whether or not to accept Cookies from us that complies with all applicable data protection laws, including but not limited to the EU GDPR, and all applicable global regulations related to the use of Cookies. Where applicable by local law, visitors to our Sites are asked whether or not they want Cookies placed on their browsers. If you choose not to have Cookies placed on your device, we will comply with your opt out and no Cookies that we personally control will be placed on your device. In countries where an explicit opt in is not required, we offer you the opportunity to opt out at any time; otherwise, we will place Cookies on your device for the purposes stated above. You can learn more about how to manage your cookies by visiting www.aboutcookies.org, which provides detailed information on managing cookies on popular browsers.

It is important to know that we adhere to all applicable Cookie regulations and data protection laws. As data protection laws change around the world, we change our policies, procedures and processes to ensure compliance with all relevant laws, regulations and directives.

Compliance with Cookie Laws and Regulations

We are committed to compliance with all applicable country-specific laws regardless where our corporate headquarters is located. We take the privacy of our employees, customers, prospects, participants, suppliers, partners, sponsors, and any other visitor to our Sites very seriously and ensure that we have put in place the necessary policies, procedures and processes to ensure we meet our legal obligations and protect the privacy of all data subjects.

Where required by law, we require an explicit opt-in from you before placing any Cookies on your devices. If local law does not require an explicit opt-in, we offer you the opportunity to opt-out.

Privacy

We are committed to privacy. For more information about our approach to privacy see our [Global Data Privacy Policy](#).

How to Contact Us

If you have any questions about how we use Cookies, you can contact us by emailing us at enroll@conqueringhealth.org. Please include your contact information, the name of the Site or service, and a detailed description of your request or Cookie concern.

We may change this Policy at any time. Any changes to this Policy will become effective when we make the revised Policy available on or through the Sites.