

# STAR THERAPEUTICS

## PRIVACY POLICY

**Effective date:** February 16, 2022.

Thank you for visiting [www.star-therapeutics.com](http://www.star-therapeutics.com) (the “Site”), owned and operated by Star Therapeutics, Inc. (“we,” or “us”). We respect your privacy and, whether you are visiting the Site as a job applicant, customer, or member of the general public, you are entitled to the protection of your personal information. Please read this Privacy Policy to learn how we treat your personal information.

**By using or accessing our Site in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of our Site is at all times subject to our Terms of Use, which incorporates this Privacy Policy. Any terms we that use in this Privacy Policy without defining them shall have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by **clicking here**. If you have a disability, you may access this Privacy Policy in an alternative format by contacting [info@star-therapeutics.com](mailto:info@star-therapeutics.com).

### **Privacy Policy Table of Contents**

#### **What this Privacy Policy Covers**

##### **Personal Data**

- *Categories of Personal Data We Collect*
- *Categories of Sources of Personal Data*
- *Our Commercial or Business Purposes for Collecting Personal Data*

##### **How We Share Your Personal Data**

##### **Tracking Tools and Opt-Out**

##### **Data Security and Retention**

##### **Personal Data of Children**

##### **California Resident Rights**

##### **Other State Law Privacy Rights**

##### **European Union Data Subject Rights**

##### **Changes to this Privacy Policy**

##### **Contact Information**

## 1. WHAT THIS PRIVACY POLICY COVERS.

This Privacy Policy covers important information and disclosures relating to how we treat Personal Data that we gather when you access or use our Site, but does not cover the practices of companies we don't own or control or people we don't manage.

Use of the term "Personal Data" herein means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations.

## 2. PERSONAL DATA.

### Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
<b>Profile or Contact Data</b>	<ul style="list-style-type: none"> <li>• First and last name</li> <li>• Email</li> <li>• Phone number</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Device ID</li> <li>• Domain server</li> <li>• Type of device/operating system/browser used to access the Site</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"> <li>• Web page interactions</li> <li>• Referring webpage/source through which you accessed the Site</li> <li>• Non-identifiable request IDs</li> <li>• Statistics associated with the interaction between device or browser and the Site</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Professional or Employment-Related Data</b>	<ul style="list-style-type: none"> <li>• Resume</li> <li>• Job title</li> <li>• Job history</li> <li>• Performance evaluations</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Geolocation Data</b>	<ul style="list-style-type: none"> <li>• IP-address-based location information</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> <li>• Business Partners</li> </ul>

		<ul style="list-style-type: none"> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Other Identifying Information that You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"> <li>• Identifying information in emails or letters you send us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
    - When you use our Site.
    - When you voluntarily provide information in free-form text boxes through the Site or through responses to surveys or questionnaires.
    - When you send us an email or otherwise contact us.
  - When you use the Site and such information is collected automatically.
    - Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).
    - If you use a location-enabled browser, we may receive information about your location.
- **Third Parties**
  - Vendors
    - We may use analytics providers to analyze how you interact and engage with the Site, or third parties may help us provide you with customer support.
    - We may work with third party partners to perform background checks on job applicants, and receive publicly available information such as criminal history and education verification.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Site**
  - Providing you with the products, services or information you request.
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Site.
  - Improving the Site, including testing, research, internal analytics and product development.
  - Personalizing the Site, website content and communications based on your preferences.
  - Doing fraud protection, security and debugging.
  - Evaluating and processing your job application, if you choose to apply for a job with us.
  - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).

- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about us or the Site.
  - Sending emails and other communications according to your preferences or that display content that we think will interest you.
  
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - Protecting the rights, property or safety of you, us or another party.
  - Enforcing any agreements with you.
  - Responding to claims that any posting or other content violates third-party rights.
  - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

### 3. HOW WE SHARE YOUR PERSONAL DATA.

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide our services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Security and fraud prevention consultants.
  - Background and reference check screening services and hiring process management tools, if you choose to apply for a job with us.
  
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Site. They include:
  - Companies that track how users found or were referred to the Site.
  - Companies that track how users interact with the Site.
  
- **Business Partners.** These parties partner with us in offering various services. They include:
  - Businesses that you have a relationship with, including our affiliates
  
- **Parties You Authorize, Access or Authenticate**
  - Third parties you access through the services.
  - Other users.

#### Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

#### Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

#### Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Site and promote our business, provided that we will not share such data in a manner that could identify you.

#### **4. TRACKING TOOLS AND OPT OUT.**

The Site use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser and tell us how and when you visit and use our Site, to analyze trends, learn about our user base and operate and improve our Site. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Site. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Site does not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Site. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Site, maintain your preferences over time and recognize you when you return to our Site. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Site such as by collecting information about the number of visitors to the Site, what pages visitors view on our Site and how long visitors are viewing pages on the Site. For example, Google Inc. (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Site and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit or <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

## **5. DATA SECURITY AND RETENTION.**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, and administrative security measures and storage and processing practices based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the Internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide our Site and/or services to you. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

## **6. PERSONAL DATA OF CHILDREN.**

We do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Site or send us any Personal Data. If we learn that we have collected personal information from an individual under 16 years of age, we will delete such information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com).

## **7. CALIFORNIA RESIDENT RIGHTS.**

If you are a resident of California, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights.

If there are any conflicts between this section and any other provision of this Privacy Policy, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com).

### **Access**

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we

have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

### **Deletion**

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Site or services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

### **Exercising Your CCPA Rights**

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information (first and last name, email address, phone number) to allow us to verify that you are either the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request by emailing us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com).

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

### **Personal Data Sales Opt-Out and Opt-In**

We will not “sell” your Personal Data, as that term is defined in the CCPA, and have not done so over the last 12 months. To our knowledge, we also do not sell the Personal Data of minors under 16 years of age.

### **We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA**

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you access to our Site or provide you a lower quality of services if you exercise your rights under the CCPA. If you have any questions about this section or whether any of the above rights apply to you, please contact us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com).

## **8. OTHER STATE LAW PRIVACY RIGHTS**

### **California Resident Rights**

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes. If you would like to submit such a request, please contact us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com).

## **Nevada Resident Rights**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. If you are a Nevada Resident, you can exercise this right by contacting us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com) with the subject line “Nevada Do Not Sell Request” and providing us with your name. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

## **9. EUROPEAN UNION DATA SUBJECT RIGHTS**

### **EU Residents**

If you are a resident of the European Union (“EU”), United Kingdom, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. We will be the controller of your Personal Data processed in connection with your use of the Site.

If there are any conflicts between this this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com).

### **Personal Data We Collect**

The “Categories of Personal Data We Collect” subsection above of this Privacy Policy above details the Personal Data that we collect from you.

### **Personal Data Use and Processing Grounds**

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- **Contractual Necessity:** We may process Personal Data as a matter of “contractual necessity”, meaning that we may need to process the data to perform under our Terms of Use with you, which enables us to provide you with the Site and our services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Site that require such data.
  - Profile or Contact Data
  - Device/IP Data
  - Web Analytics
  - Other Identifying Information You Choose to Provide

- **Legitimate Interest:** We process the following categories of Personal Data when we believe it furthers the legitimate interests of us or third parties:
  - Profile or Contact Data
  - Device/IP Data
  - Web Analytics
  - Professional or Employment-Related Data
  - Geolocation Data
  - Other Identifying Information You Choose to Provide
  - We may also de-identify or anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include (as described in more detail above):

- Providing, customizing and improving the Site.
  - Corresponding with you.
  - Meeting legal requirements and enforcing legal terms.
  - Completing corporate transactions.
- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
  - **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

### Sharing Personal Data

The “How We Share Your Personal Data” section above details how we share your Personal Data with third parties.

### **EU Data Subject Rights**

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at [info@star-therapeutics.com](mailto:info@star-therapeutics.com). Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

***Access:*** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.

- ***Rectification:*** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- ***Erasure:*** You can request that we erase some or all of your Personal Data from our systems.
- ***Withdrawal of Consent:*** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Site.

- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about our practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## **Transfers of Personal Data**

The Site is hosted and operated in the United States (“U.S.”) by us and through our service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Site, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to us in the U.S. and will be hosted on U.S. servers, and you authorize us to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. pursuant to: (i) a data processing agreement incorporating standard data protection clauses promulgated by the European Commission, (ii) binding corporate rules for data protection that align with the GDPR’s requirements, or (iii) adherence to an industry- or technology-specific approved code of conduct blessed by the European Commission.

## **10. CHANGES TO THIS PRIVACY POLICY.**

We’re constantly trying to improve our Site and services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on our website, by sending you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Site and/or services, and you are still responsible for reading and understanding them. If you use the Site and/or services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

## **11. CONTACT INFORMATION.**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, or your choices and rights regarding such collection and use, please do not hesitate to contact us at: [info@star-therapeutics.com](mailto:info@star-therapeutics.com).