



MYTRUS PRIVACY POLICY
(last updated: March 24, 2017)

Mytrus, Inc. (“Mytrus,” “we,” “us,” or “our”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the personal information we collect from users of our websites and mobile applications (collectively, the “Site”) and online services (“Services”).

THE INFORMATION WE COLLECT

Mytrus does not collect personal information via the Site unless you submit personal information to us in connection with using the Site or Services.

The Services may collect and store certain personal information from you, including contact information, so we can communicate with you in regard to your use of the Services. At a minimum, we may collect and store your first name and last (family) name. If you create an account on the Site, we may also collect and store your email address, which will serve as your account’s “user name.” As may be required for the research in which you are participating that is being carried out by a third party (the “Sponsor”), we may ask for you to provide additional personal information. Such personal information can include your date of birth, residential address, and phone numbers (e.g., home, work, mobile). For Services that obtain your consent to participate in research, this personal information may also include a digitized image of your handwritten signature.

Depending on the research study in which you are participating via the Site, we may collect and store information related to your health and medical condition (“Medical Data”) as required for the research in which you are participating that is being carried out by the Sponsor. The type of Medical Data collected will necessarily vary according to the research in which you are participating. The Medical Data may be collected directly from you via online forms that you complete and submit to the Site or from researchers who may use the Site to submit your Medical Data on your behalf. Typically, we collect this information from you via a computer or tablet at the time you enroll as a participant in the research and subsequently during your continued participation in the research.

Prior to asking you to provide your Medical Data via the Services, the Sponsor will inform you in detail regarding the types of data that you may be asked to provide during your participation in the research. Moreover, the Sponsor will require you to agree to one or more additional consents and privacy authorizations before asking you to submit any Medical Data. We do not collect and

store Medical Data from you unless you agree to the terms of a privacy authorization provided by the Sponsor during the process of enrolling in the Sponsor's research using the Services. If you do not agree to the additional privacy authorization, none of your Medical Data will be collected and stored on the Site. However, some minimal personal information that you submitted to the Site (such as your first name, last name, and email address) may continue to be stored, unless you contact us to request that we delete your personal information (see the following section "Changing or Deleting Your Personal Information").

We may also collect certain usage and/or aggregate information as a result of your use of, and interaction with, the Site or Services ("Indirect Information"), including using certain standard web measurement and tracking technologies such as "cookies," web server logs, or other statistics and analytics services to track and record how you use the Site. Indirect Information helps us to measure the success of the Site and its features or pages and to improve your online experience. Your browser may have an option that allows you to accept cookies, reject cookies, or receive notification when a cookie is sent, but you should note that the use of such restrictive browser settings can limit your use of the Site.

The Site may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help Mytrus analyze how users use the Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Site, compiling reports on website activity for website operators and providing other services relating to website activity and Internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Site. By using the Site, you consent to the processing of data about you by Google in the manner and for the purposes set out above. You can opt-out of Google Analytics at any time by installing the opt-out plugin, available at the following web page:

<http://tools.google.com/dlpage/gaoptout?hl=en-GB>

The Site does not currently respond to "do not track" signals from web browsers.

The Site may use Adobe's Typekit WebFont service. For information regarding privacy and Typekit, please view the Typekit privacy policy at the following web page:

<http://www.adobe.com/privacy/policies/typekit.html>

USE OF INFORMATION COLLECTED

We only use Medical Data for the specific purposes described in the privacy authorization that is provided by the Sponsor and to which you must agree before participating in the research being conducted by the Sponsor. We do not share or use Medical Data for any other reason and we securely destroy all Medical Data after use.

We use your Indirect Information for the following business purposes:

- to determine the number of users accessing our Content;
- to analyze, manage, and improve the Services;
- to send you requested information; and
- for any other specific business purpose stated at the time you provide your information.

SHARING OF YOUR INFORMATION

We will provide your personal information to the Sponsor and partners of the Sponsor who are authorized to receive such information for the purpose of conducting and supporting the research in which you are participating.

We do not provide any of your information to other Mytrus employees or to any unaffiliated third parties. If this practice changes in the future, we will update this policy and provide individuals with opt-out or opt-in choice prior to sharing their data.

We may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

Regardless of any choices you make regarding your personal information, Mytrus may disclose personal information if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on Mytrus; (c) to protect or defend the rights or property of Mytrus or users of the Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law or this Privacy Policy and in response to lawful requests by public authorities including to meet national security and law enforcement requirements.

INTERNATIONAL VISITORS

The Services are hosted in the United States and is intended solely for visitors located within the United States and Canada. If you nonetheless choose to use the Services from the European Union or other regions of the world whose laws governing data collection and use may differ from U.S. law, then please note that by submitting any personal information, you are transferring your personal information outside of those regions to the United States and that you consent to such transfer.

EU-U.S. PRIVACY SHIELD

Mytrus complies with the EU-US Privacy Shield Framework as set forth by the U.S. Department

of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Mytrus has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit the following website:

<http://www.privacyshield.gov>

Mytrus is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC) and the U.S. Food and Drug Administration (FDA).

As described in the Privacy Shield Principles, Mytrus is accountable for personal data that it receives under the Privacy Shield Framework and subsequently transfers to third parties. If third parties that process personal data on our behalf do so in a manner that does not comply with the Privacy Shield Principles, we are accountable, unless we prove that we are not responsible for the event giving rise to the damage.

To review the Privacy Shield Principles, please visit the following web page:

<https://www.privacyshield.gov/article?id=Requirements-of-Participation>

In compliance with the EU-US Privacy Shield Principles, Mytrus commits to resolving complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact Mytrus at:

Mytrus, Inc.
105 E Street, Suite 2B
Davis, CA 95616
USA

Phone: (530) 564-4600

Email: privacy@mytrus.com

Mytrus has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please contact BBB EU Privacy Shield using the following web page:

<https://www.bbb.org/EU-privacy-shield/for-eu-consumers/>

Finally, as a last resort and in limited circumstances, unresolved privacy complaints from EU individuals can be addressed before a Privacy Shield Panel, a binding arbitration mechanism.

A NOTE ABOUT CHILDREN

We do not intentionally gather personal information from visitors who are under 13 years of age. If a child under 13 years of age submits personal information to us and we learn that the personal information is the information of a child under 13 years of age, we will attempt to delete the information as soon as possible. If you believe that we might have any personal information from a child under 13 years of age, please contact us at the following e-mail address:

privacy@mytrus.com

YOUR CHOICES

You have several choices regarding the use of information on our Services:

Email Communications. If you are a medical practitioner or bioscience professional and you contact us via email, we may use your email address to send you email communications about Mytrus and Mytrus products that are related to your practice, specialty and interests. In the event that you choose not to receive any future communications, you may opt-out by clicking on the link provided at the bottom of each email communication. Despite your indicated e-mail preferences, we may send you service-related communications, including notices of any updates to our Privacy Policy.

Changing or Deleting Your Personal Information. Mytrus acknowledges the individual's right to access, modify, and delete his or her personal information. If the Site does not already provide you with the ability to access, modify, or delete your personal information, you may request access to or changes to be made to any of the personal information you submitted to us by sending your request in e-mail to us at the e-mail address set forth below. You may request deletion of your personal information by us, and we will use reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). For example, applicable laws and regulations may prevent your personal data from being deleted if that data was captured for the purpose of your participation in a clinical research trial. When we delete any information, it will be deleted from the active database but it may remain in our archives. We may also retain your information for fraud-prevention or similar purposes.

SECURITY

Mytrus is committed to protecting the security of your personal information. We use a variety of industry-standard security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while Mytrus uses reasonable efforts to protect your personal information, Mytrus cannot guarantee its absolute security.

THIRD-PARTY WEBSITES

Our Site may contain links to third-party websites. When you click on a link to any other website or location, you will leave our Site and go to another site, and another entity may collect information from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your personal information after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

CHANGES AND UPDATES TO THE PRIVACY POLICY

From time to time, we may revise this Privacy Policy. To help you stay informed of any changes, we note the date that the Privacy Policy was last updated on the first page of this document and in the header of each subsequent page. Your use of the Services following the posting of any revised Privacy Policy shall be deemed acceptance of the revised policy. If you disagree with the provisions of this Privacy Policy, your sole remedy is to terminate your use of the Services.

CONTACT

If you have any questions regarding privacy while using the Services, or have questions about Mytrus's practices, or wish to review or update your information, please contact Mytrus at:

Mytrus, Inc.
105 E Street, Suite 2B
Davis, CA 95616
USA

Phone: (530) 564-4600

Email: privacy@mytrus.com