

# PROQURE PRIVACY POLICY

*Effective January 1, 2022*

This is the ProQ Australia Pty. Ltd. and/or ProQure Inc. (collectively “us” or “we” or “ProQure”) Privacy Policy (“Privacy Policy”). This Privacy Policy relates to the processing of personal information of any person (collectively “you” or “your” or “user”), that we may collect from our website, platform, progressive web applications, mobile applications, or any other product or services we offer. This Privacy Policy is written to explain what information we collect, how we use it, whom we share it with, and the choices you have to access, update and control your information. This Privacy Policy does not apply to the information that you may provide to third parties, and others with whom you may share information about yourself.

ProQure complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. ProQure 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 U.S. Department of Commerce’s [Privacy Shield List](#).

## **1. What Information do we collect?**

When ordering a product or service from ProQure or registering on our site or platform, as appropriate, you may be asked to enter your name, email address, phone number, information relating to the business you represent or other details to help you with your experience. Also, we may collect your payment information (e.g., credit card number and related verification information) and billing and shipping addresses when you purchase a product or service.

When you visit or use our website or platform, we may collect information from your computer, phone, or other mobile device from which you access the site or platform, including but not limited to your browser type, operating system, IP address, domain name, type of mobile device from which you gain access, and your mobile advertising identifier. We may collect information about your browsing behavior, such as the date and time of your visit, the areas or pages you visit, the amount of time you spend on our site or platform, the number of times you return and other click-stream data in order to analyze trends in the aggregate and to administer the site and/or platform. Our mobile application does not require an account and will not ask you for any personal information.

## **2. When do we collect information?**

We collect information from you when you register on our site, subscribe to a newsletter, respond to a survey, fill out a form or enter information on our site or platform. In addition, our site, platform and mobile applications may collect certain information automatically, including, but not limited to, the type of device you use, your device's unique device ID, the IP address of your device, your operating system, the type of internet browser you use, and information about the way you use our site, platform and mobile applications. This applies to all types of devices including, but not limited to desktops, laptops, mobile devices or tablets.

## **3. How do we use your information?**

We may use your information to support our products and services, as well as to deliver the best possible experience to our users. This includes the following uses:

- Respond to a survey or marketing communication;
- Personalize user's experience and to allow us to deliver the type of content and product offerings in which you are most interested;
- Improve our website in order to better serve you;
- To allow us to better service you in responding to your customer service requests;
- Contextualize the content we deliver through our site, platform or mobile application based on your location;
- Administer a contest, promotion, survey or other site feature.
- Notify you of relevant company updates, events, promotions or other education content;
- Verify your identity, only as applicable, to prevent fraud or other unauthorized activity;
- Monitor and analyze aggregate trends and usage;
- Process and ship orders for ProQure products and/or services; and
- And any other use that we describe at the time when we collect data or information from you with your consent.

#### **4. How do we protect visitor information?**

We are concerned about safeguarding the confidentiality of your information. We use vulnerability scanning and/or scanning to PCI standards. We use regular Malware Scanning. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our products and services. Please be aware that, although we endeavor to provide reasonable security for

information we process and maintain, no security system can prevent all potential security breaches.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

All payment transactions are processed through a gateway provider and are not stored or processed on our servers.

## **5. Do we use Cookies?**

Yes. Cookies are small files that a site or its service provider transfers to your device through your web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information about your device and/or activity on our site or platform.

For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your device warn you each time a cookie is being sent, or you can choose to turn off all cookies. You decide whether cookies are stored on your device and can choose to delete them. By doing so, you may not be able to use certain features on the ProQure site or platform, or take full advantage of all of the ProQure products and services.

Each browser is a little different, so look at your browser's help menu to learn the correct way to modify your cookies.

## **6. How do we share your information?**

We do not sell, trade, or otherwise transfer to outside parties your information, except as listed below:

We may share your information with certain trusted third-party services to help us provide, improve, promote, or protect ProQure's products or services (like when we partner with payment processors). When we share data with third-party services that support our delivery of the ProQure products or services, we require that they use your information only for the purposes we've authorized, and that they protect your personal information at least to the same standards we do. We may also share information that's aggregated and anonymized in a way that it doesn't directly identify you.

Our products or services may include third party links, integrations, or third party-branded services that are being provided jointly with or by another company. By going to those links, using the third-party integration, or using a third party-branded service, you may be providing information (including personal information) directly to the third party. You acknowledge and agree that we are not responsible for how those third parties collect or use your information. We encourage you to review the privacy policies of every third-party website or service

that you visit or use, including those third parties you interact with through our services.

If ProQure is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

We do reserve the right to disclose personal information when we believe that doing so is reasonably necessary to comply with the law or law enforcement, to prevent fraud or abuse, or to protect ProQure's legal rights, property, or the safety of ProQure, its employees, users, or others.

We may also disclose your personal information to any other third party but only with your prior consent.

## **7. Third party links**

We include links to third party products and services on our website and mobile applications. We are not responsible for the accuracy of the information and content provided by third parties. Please be sure to read any privacy policies provided by those third parties to understand how they collect and store your information as it may be different from ours. When you use a link to an external site or service, the privacy policy and data processing disclosures for that site or service governs.

## **8. Data retention**

We retain certain information that we collect from you while you are a user of the site, platform, or mobile application and in certain cases where you have deleted your account, for the following reasons:

- So you can use our site, platform, mobile applications or other product or service;
- To ensure that we do not communicate with you if you have asked us not to;
- To provide you with a refund, if entitled;
- To better understand the traffic to our site or platform so we can provide all users with the best possible experience;
- To detect and prevent abuse of our site, platform, or mobile applications, illegal activities and breaches of our Terms of Use; and
- To comply with applicable legal, tax or accounting requirements.

When we have no ongoing legitimate business need to process your information, we will either delete or anonymize it.

## **9. Data rights**

*Note to Residents of the European Union and California: In order to comply with the requirements of the European General Data Protection Regulation (GDPR) for our European users, and California Consumer Privacy Act (CCPA), this section of our Privacy Policy outlines the rights you have pertaining to your personal data and provides other information required by the GDPR & CCPA.*

You may have the right to exercise your data protection rights, including to request that ProQure deletes, amends, or provides you access to your information. You have the right to opt out of receiving ProQure's promotional messages, but you may still receive other communications. You can complain to your local data protection authority about the use of your information.

With regards to third-party applications, ProQure has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to our Client (the data controller).

We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us by sending an email to [info@proquire.io](mailto:info@proquire.io).

Rights that you may have, depending on the country in which you live, include:

- Accessing, correcting, updating, or requesting deletion of your information;
- Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information;
- Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the “unsubscribe” or “opt-out” link in the marketing emails we send you;
- Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent; and
- Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available below.

## **California Privacy Rights**

This section provides additional details about California consumers and the rights afforded to them under the California Consumer Privacy Act or (“CCPA”).

Under CCPA “Personal Information” is defined as anything that identifies, relates to, describes or is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular California consumer of household. For more details about the Personal Information we have collected over the last 12 months,



including the categories of sources, please see Sections 1 and 2 above. We collect this information for the business and commercial purposes described in Section 3 above. We share this information with the categories of third parties described in Section 6 above. ProQure does not sell (as such term is defined in the CCPA) the personal information we collect (and will not sell it without providing a right to opt out). Please note that we may use third-party cookies for our advertising purposes as further described in Section 5 above.

The CCPA requires opt-in consent to information use for minors under the age of 16 and verified parental consent for children under the age of 13. We do not knowingly collect or process the information of children.

Subject to certain limitations, the CCPA provides California consumers the right to request, free of charge, to know more details about the categories or specific pieces of personal information we collect (including how we use and disclose this information), to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at [info@proquire.io](mailto:info@proquire.io). We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

## **10. Information of minors**

We do not knowingly solicit or collect personal information from or about children under 13 years of age, and we do not knowingly market ProQure products or services to children.

## 11. EU-US Privacy Shield Framework

### Privacy Shield principles

**Notice.** Any personal information received by ProQure in connection with its business is provided voluntarily by persons having “ownership” of such information. ProQure provides persons with an explanation about the types of information collected or maintained, how such information is maintained and protected, and how to contact ProQure to request review, correction or deletion of such information. Personal information is never disclosed to a third party without consent of the affected individual(s). In certain limited cases and only where authorized by Privacy Shield principles, ProQure may be unable to provide notice of disclosure of personal information to affected person(s). For example, Privacy Shield principles do not require notice where disclosure of personal information is required to comply with a court or other valid government order or inquiry, where applicable laws or regulations waive notice requirements, or where protection of legitimate ProQure legal interests would be compromised by notice.

**Choice.** ProQure will not use any personal information collected from or about covered individuals for any purpose not authorized by the individual. For the purpose of this section, voluntary provision of personal information in connection with the performance of certain activities will constitute authorization as will a written statement granting permission to use or disclose information for certain stated purposes. Individuals may contact ProQure via the information below at any time to inquire about the types of personal information ProQure currently maintains and to request either changes in authorized uses or deletion of their personal information from ProQure’s records.

**Data Integrity.** ProQure strives to ensure that any personal information collected or maintained about covered individuals is complete, accurate and reliable for the purposes for which the information was obtained or authorized.

**Transfers to Third Parties.** ProQure does not share personal information collected with any third parties without consent. If we ever were to engage in any onward transfers of your data with third parties other than our agents, we would provide you with an opt-out choice to limit the use and disclosure of your personal data. ProQure also may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, ProQure is potentially liable.

**Access and Correction.** ProQure acknowledges that EU individuals have the right to access the personal information that we maintain about them. Covered individuals may contact ProQure in writing via the information below to request reasonable access to their personal information. ProQure will take reasonable steps to allow such individuals to review, correct or request deletion of their personal information.

**Security.** ProQure has implemented a variety of commercially reasonable physical security and information technology measures to protect personal information. Such security measures are supplemented by operational procedures and staff training. ProQure safeguards information according to established security standards and periodically assesses new technology for methods of protecting information. However, the Company cannot guarantee the security of personal information.

**Enforcement.** ProQure has established internal management practices and policies to support the Privacy Shield principles. ProQure encourages covered individuals with concerns about its information management practices to contact ProQure at the address below. ProQure is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

## **Privacy Shield Complaint Resolution**

In compliance with the US-EU Privacy Shield Principles, ProQure commits to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this Privacy Policy should first contact ProQure:

**By Mail:**

Privacy Shield

ProQue

L2, 456 Fitzgerald Street,

North Perth, WA 10010

**By e-Mail:**

[info@proquire.io](mailto:info@proquire.io)

ProQure has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints/> for more information and to file a complaint. This service is provided free of charge to you.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

## **Changes to this Privacy Shield statement**

This privacy statement may be amended consistent with the requirements of Privacy Shield. If you would like a copy of this Privacy Shield Statement in a permanent form please print a copy for your records. When we do update the Privacy Shield Statement, we will also revise the “Last Updated” date.

## **Learn more**

To learn more about the Privacy Shield program, please visit <http://www.privacyshield.gov>.