



Alosetron REMS Privacy Policy

In order to meet the U.S. Food and Drug Administration (FDA) requirements, one component of the Alosetron REMS involves the creation of a website (hereinafter, the "Website") that allows healthcare providers to submit personally identifiable information ("Personal Information"). Protecting your privacy is very important for the Alosetron REMS. Please read this Privacy Policy before submitting your Personal Information. As used herein, the term "Alosetron REMS" collectively refers to the sponsors and affiliated vendors of the program.

What This Privacy Policy Covers

- This policy covers how the Alosetron REMS treats the Personal Information it collects and receives from healthcare providers. Personal Information is information about you like your name, address, email address, or phone number.
- This policy does not apply to the practices of companies that the Alosetron REMS does not own or control, or to people that the Alosetron REMS does not employ or contract with.

Your Consent

- By using the Website you agree to the terms of this Privacy Policy. Whenever you submit information to us through the Website, you consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy, including agreeing that we may contact you through a variety of means such as email, postal mail, phone, or fax. By submitting information to Alosetron REMS related to the REMS program, you are consenting to Alosetron REMS using and sharing this information for any purpose consistent with the goals of the REMS program and to effectuate operation and administration of the REMS program.

Information Collection and General Use

- If you are a healthcare provider, the Alosetron REMS collects Personal Information when you train in the Alosetron REMS, when you use services or products of the Alosetron REMS, and when you visit the Website at www.AlosetronREMS.com. The Alosetron REMS will then have Personal Information about you such as your name, address, phone number, and email address. Once the Alosetron REMS has this Personal Information, you are no longer anonymous to the Alosetron REMS.
- The Alosetron REMS collects information about your transactions within the Alosetron REMS.
- The Alosetron REMS automatically receives and records information on our server logs from your computer, including your Internet Protocol (IP) address, the Alosetron REMS cookie information and the pages you visit, but only with regard to your interactions with the Alosetron REMS.
 - An IP address is a number assigned to your computer for access to the Internet. All computer identification on the Internet is conducted with IP addresses, which allow computers and servers to recognize and communicate with each other.

- The Alosetron REMS uses your Personal Information to fulfill your requests for services and products, to contact you on Program related matters, and to conduct follow-up research. We use aggregated (non-personally identifiable) information to help us understand trends, Website performance, and healthcare provider needs. For example, we may conduct geographic analyze of visitors to the Website, and we may use that analysis of aggregate data internally or share it with others, such as the sponsors of the Alosetron REMS or the FDA.

Information Sharing and Disclosure

- The Alosetron REMS does not rent or sell Personal Information about you to other people or to nonaffiliated companies for any reason. Furthermore, the Alosetron REMS does not share personally identifiable information about you with other people or with affiliated or nonaffiliated companies, except to provide products or services you have requested, when the Alosetron REMS has your permission or under the following circumstances:
 - We provide information to companies who work on behalf of or with the Alosetron REMS under confidentiality agreements. These companies may use Personal Information to help the Alosetron REMS communicate with you about matters only as it relates to the Alosetron REMS. These companies do not have any independent right to share or use this information.
 - We respond to subpoenas, court orders, or legal process or to establish or exercise our legal rights or defend against legal claims.
 - We believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of the Alosetron REMS's terms of use or as otherwise required by law.
 - We transfer information about you if the Alosetron REMS is acquired by or merged with another company. In this event, the Alosetron REMS will post the change notification before information about you is transferred and/or becomes subject to a different privacy policy.

Cookies

- The Alosetron REMS may set and access the Alosetron REMS non-persistent cookies on your computer.
 - A cookie is a piece of information that is placed on your computer when you access certain websites. The cookie uniquely identifies your computer to the Alosetron REMS server. Cookies allow us to store information on the server to help make the Website experience better for you and to conduct site analyses and Website performance reviews. Most internet browsers are set up to accept cookies, although you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of our site may not work properly if you refuse cookies. Check the "Help" menu of your browser to learn how to change your cookie preferences. To find out more about cookies, visit www.aboutcookies.org.

Tracking Pixels / Web Beacons

- The Alosetron REMS may embed tracking pixels within various Website pages to enable use of site analytics. Site analytics enable us to determine the usage frequency of various areas of the Website and identify areas of the Website for enhancement.
- On certain Website pages or e-mails, the Alosetron REMS may utilize a common Internet technology called a "Web beacon" (also known as an "action tag" or "clear GIF technology.") Web beacons help analyze the effectiveness of websites by measuring, for example, the number of visitors to a website or how many visitors clicked on key elements of a website.
- Web beacons, cookies and other tracking technologies do not automatically obtain Personal Information about you. Only if you voluntarily submit Personal Information can these automatic tracking technologies be used to provide further information about your use of the websites and/or interactive e-mails to improve their usefulness to you.
- Certain tracking pixels and web beacons may be cleared or reset through configuration of your web browser such as by clearing your cache.
- The Website does not track users over time and across the third party site to provide targeted advertising, and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such websites and do not want to be tracked, please adjust your web browser settings so third parties know you do not want to be tracked.

Confidentiality and Security

- We limit access to Personal Information about you to employees of the Alosetron REMS services provider(s) whom we believe reasonably need to come in contact with that information to provide services or products to you or in order to do their jobs. Personal Information is never used for marketing or sales purposes.
- We have physical, electronic and procedural safeguards that comply with federal and state regulations to protect Personal Information about you.

Information from Children

- The Program and the Website are not intended for any user under the age of 13 and we do not knowingly collect Personal Information from children under the age of 13. We request that children under the age of 13 not submit any Personal Information through the Site. If we determine that such information has been inadvertently collected on anyone under the age of 13, we will take the necessary steps to ensure that such Personal Information is deleted from our systems. If you are a parent or guardian and become aware that your child has provided us with information, please contact us using one of the methods specified below.

Information Retention

- We retain information collected through the Website for as long as it is necessary to provide you with the services and comply with applicable laws, regulations, and court orders. For ease of use, the Website temporarily stores some user provided information, such as username and password, until the browser is closed.

Your Rights – California Residents

Access to Specific Information and Personal Information Portability Rights

- You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that companies disclose certain information to you about their collection and use of your Personal Information over the past 12 months. This right of access includes information about:
 - The categories of Personal Information we collected about you.
 - The categories of sources for the Personal Information we collected about you.
 - Our business or commercial purpose for collecting that Personal Information.
 - The categories of third parties with whom we share that Personal Information.
 - The categories of Personal Information that each recipient received.
 - The specific pieces of Personal Information we collected about you.

Deletion Request Rights

- You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that a company delete any of your Personal Information that it has collected from you and retained, subject to certain exceptions.

Non-Discrimination

- California consumers also have the right not to receive discriminatory treatment if they exercise the rights list above.

Exercising Access, Personal Information Portability, and Deletion Rights

- When you make a request, we may require that you provide information and follow procedures so that we can verify the request and your jurisdiction before responding to it. The verification steps we take may differ depending on the request you make. We will match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it. If we cannot verify your request, we may ask you for additional information to help us verify your request.
- Consumers will be required to submit their first and last name and email address and may also be asked to provide their telephone number or address so that we can verify the request. Please provide as much of the requested information as possible to help us verify the request. We will only use the information received in a request for the purposes of responding to the request.
- We are not required to respond to a consumer's requests for access or disclosure of Personal Information more than twice in a 12-month period.

Authorized Agent

The CCPA permits California consumers to use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of the California consumer's written permission (for example, a power



of attorney) that shows the authorized agent has the authority to submit a request for the California consumer. An authorized agent must follow the process described above to make a request. The authorized agent must also verify his/her own identity. We will confirm the agent's authority with the California consumer about whom the request was made.

No Sale of Personal Information

We are not currently selling your Personal Information.

Information Exempt from the CCPA

Note that certain information that is governed by the California Confidentiality of Medical Information Act (CMIA), HIPAA, or is subject to the Federal Policy for the Protection of Human Subjects, also known as the Common Rule, pursuant to good clinical practice guidelines issued by the International Council for Harmonisation or pursuant to human subject protection requirements of the FDA, is not considered Personal Information with respect to the rights of California residents noted above. However, additional rights might be available under those laws and standards.

Your Rights – How to Exercise

To exercise any of the rights described above, you can get in touch with us by contacting the Alosetron REMS at 1-844-267-8675.

Changes to This Privacy Policy

- From time to time, the Alosetron REMS may update this Privacy Policy. We will notify you about significant changes in the way we treat Personal Information by sending you a notice or by placing a prominent notice on the Website. Continued use of our Website following any changes in our Privacy Policy indicates your consent to the use of newly submitted information in accordance with the amended/updated Privacy Policy. The effective date of this Privacy Policy is June 7, 2021.

Questions and Suggestions

- If you have questions, please contact the Alosetron REMS Contact Center at 1-844-267-8675.

Refer to the Alosetron REMS Terms of Use for additional information.