**Privacy Policy**

Effective date: January 1, 2022

At Pipeline, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Website in any manner, you acknowledge that you accept the practices and policies outlined below, and you understand the collection, use and share of your information as described in this Privacy Policy.**

Remember that your use of Pipeline's Website is at all times subject to our [Terms of Use](https://pipelinetherap.wpengine.com/terms-of-use/), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

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**What this Privacy Policy Covers**

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Website. “Personal Data” 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.

Pipeline Therapeutics wants to make sure that you understand what personal information is collected about you, how your personal information is used and how it is kept safe.

This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

**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:

|  |  |  |
| --- | --- | --- |
| **Category of Personal Data**  | **Examples of Personal Data We Collect** | **Categories of Third Parties With Whom We Share this Personal Data:** |
| **Profile or Contact Data** | * First and last name
* Email
 | * Service Providers
 |
| **Web Analytics** | * Web page interactions (including with ads)
 | * Analytics Partners
 |
| **Device/IP Data** | * IP address
* Device ID
* Domain server
* Type of device/operating system/browser used to access the Services
 | * Service Providers
* Analytics Partners
 |

*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 the interactive tools on the Website.
		- When you voluntarily provide information in free-form text boxes through the Website or through responses to surveys or questionnaires.When you send us an email or otherwise contact us.
	+ When you use the Website 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.

*Our Commercial or Business Purposes for Collecting Personal Data*

* **Providing, Customizing and Improving the Website**
	+ Providing you with the information you request.
	+ Meeting or fulfilling the reason you provided the information to us.
	+ Providing support and assistance for the Website.
	+ Improving the Website, including testing, research, and internal analytics.
	+ Doing security, prevent and detection of malicious activities and debugging.
* **Marketing the Website**
* **Corresponding with You**
	+ Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Pipeline or the Website.
	+ 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.
	+ Protecting the rights, property or safety of you, Pipeline 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.

**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 the Website or perform business functions on our behalf. They include:
	+ Hosting, technology and communication providers.
	+ Internal resource consultants.
	+ Press release distribution agencies that work on our behalf.
	+ Security consultants.
* **Analytics Partners.** These parties provide analytics on web traffic or usage of the Website. They include:
	+ Companies that track how users found or were referred to the Website.
	+ Companies that track how users interact with the Website.

*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 Website and promote our business, provided that we will not share such data in a manner that could identify you.

**Use of cookies, Tracking Tools and Opt-Out**

The Website uses 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, tell us how and when you visit and use our Website, analyze trends, learn about our user base and operate and improve our Website. 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 Website.

Cookies can be classified as follows, depending on the owner:

* First-party cookies: They are created, sent to your computer and stored by the website you are visiting directly. They allow Pipeline to collect customer analytics data, remember language settings, and carry out other useful functions that help provide a good user experience.
* Third-party cookies: They are created and placed by third parties other than the website you are visiting directly. They are not managed by Pipeline, but by the third party that processes data obtained from the cookies.

Cookies may also be separate in two categories in relation to the period for which they are stored:

* Session cookies. Session cookies allow Pipeline to recognize and link your actions during a browsing session. When you go to the login page, these temporary cookies will be created to determine whether or not your browser accepts cookies.
* Persistent cookies. Persistent cookies are placed on your device between sessions. They can be used to remember your preferences or actions on Pipeline‘s website.

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 Website does not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

* Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Website. They do this by collecting information about the number of visitors to the Website, what pages visitors view on our Website and how long visitors are viewing pages on the Website. For example, Google LLC (“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 Website 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 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 Website 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 <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union or United Kingdom.

**Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures 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 you with information you request and to operate our Website. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, 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.

**Personal Data of Children**

As noted in the Terms of Use, 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 use the Website or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that 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 ir@pipeline-tx.com.

**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; in order to submit such a request, please contact us at ir@pipeline-tx.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. We do not engage in such activity; however, if you are a Nevada resident who has used our Website, you can submit an opt out of any potential future sale under Nevada Law by contacting us at ir@pipeline-tx.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and email address. Please note we will take reasonable steps to verify your identity and the authenticity of the request. Once verified, we will maintain your request in the event our practices change.

**European Economic Area and United Kingdom Data Subject Rights**

*EEA/UK 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. Pipeline will be the controller of your Personal Data processed in connection with the Website.

If there are any conflicts between 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 ir@pipeline-tx.com.

*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 our “legitimate interests” or the legitimate interest of others, as further described below.

* Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
	+ 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 Website.
	+ Marketing the Website.
	+ Corresponding with you.
	+ Meeting legal requirements and enforcing legal terms.
	+ Completing corporate transactions.

*EEA/UK 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 ir@pipeline-tx.com . Please note that each request will be evaluated on a case-by-case basis and in some circumstances, we may not be able to fully comply with your request. Even 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 Website.
* **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 Pipeline's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. If you would like to exercise your rights, please let us know by contacting our Data Protection Officer: pipeline.DPO@mydata-trust.info. You also have the right to lodge a complaint with your local Data Protection Authority or to the Data Protection Authority where the alleged infringement took place. A list of Supervisory Authorities is available here: <https://edpb.europa.eu/about-edpb/board/members_en>.

*Transfers of Personal Data*

The Website is hosted and operated in the United States (“U.S.”) through Pipeline and its 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 Website, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Pipeline in the U.S. and will be hosted on U.S. servers, and you authorize Pipeline to transfer, store and process your information to and in the U.S., and possibly other countries. You understand the transfer of your data to the U.S. pursuant to: a data processing agreement incorporating standard data protection clauses promulgated by the European Commission, a copy of which can be obtained at <https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj>.

**Changes to this Privacy Policy**

We’re constantly trying to improve our Website, 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 the Pipeline 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 Website, and you are still responsible for reading and understanding them. If you use the Website 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.

**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:

* https://www.pipelinetherapeutics.com/
* ir@pipeline-tx.com
* 10578 Science Center Drive Ste. 200, San Diego, CA 92121

If you are located in the European Economic Area or the United Kingdom, you may use the following information to contact our European Union and United Kingdom-Based Data Protection Representative:

* MyData-TRUST LTD
* Waldeck House, Lyne Lane, Chertsey, KT16 0AW (UNITED KINGDOM)
* +44 56 0375 0073
* pipeline.dpr.UK@mydata-trust.info

You may use the following information to contact our European Union and United Kingdom-based Data Protection Officer: pipeline.dpo@mydata-trust.info