

PRIVACY POLICY

Your privacy is important to us. As part of our efforts to facilitate and make your experience with the Acrotech Biopharma Inc. (“Acrotech”) Website as user-friendly and enjoyable as possible, we may collect and use certain information you provide to us. This Privacy Policy addresses the collection, use, and disclosure of information that Acrotech may gather during your use of the Website. UNLESS OTHERWISE DEFINED IN THIS PRIVACY POLICY, TERMS USED IN THIS PRIVACY POLICY HAVE THE SAME MEANINGS AS IN THE WEBSITE TERMS OF USE <https://adquey.com/terms-of-use.pdf>.

The Acrotech Website is intended for U.S. use only. Please review the entire Privacy Policy to learn the types of End User information Acrotech gathers, how Acrotech uses that End User information, what End User information is disclosed and to what third parties, and how Acrotech safeguards your End User information.

Please also check back periodically as this Privacy Policy may change from time to time. We will notify you of any material changes by publishing the new Privacy Policy on the Website. The End User information Acrotech gathers is and will be subject to the Privacy Policy in effect at the time the information is gathered. Should you have any questions or concerns at any time, please feel free to contact us.

This Privacy Policy applies only to the Acrotech Website. This Privacy Policy does not apply to any websites managed, maintained, and/or hosted by third parties not directly affiliated with Acrotech that you may visit, e.g., via a link provided through the Website or on a website maintained by any third party. Acrotech does not control the privacy policies of other websites to which we may provide hyperlinks. We encourage you to learn more about the online privacy and data security policies of third-party websites directly from such third parties, as their policies may differ from ours.

By submitting your information to us and by using the Website, Acrotech will assume that you have read, understood, and consent to the Agreement, which includes this Privacy Policy, the Website Terms of Use, and all other applicable Acrotech rules and policies. We also assume that you consent to Acrotech’s use of your information as described in the Agreement. If you do not consent, you should not access or use the Website.

I. Information Acrotech Collects

A. Personal Information and Non-Identifying Information

We may ask you for personally identifiable information if, for example, you contact us requesting information. This refers to information about you that can be used to contact or identify you (“Personal Information”). Personal Information includes, but is not limited to, your full name, email address, and any other information that could be used to personally identify you.

We also collect other information that you provide as part of registration and the administration and personalization of your account with us that does not identify you (“Non-

Identifying Information”). Non-Identifying Information includes, but is not limited to, your zip code (on its own) and individual preferences. Certain Non-Identifying Information would be considered a part of your Personal Information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other non-identifying information (for example, your gender only or your viewing preferences).

We use your Personal Information (in some cases, in conjunction with your Non-Identifying Information) mainly to respond to correspondence from you. We may also use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications or update your account information.

We may also combine your Personal Information with Non-Identifying Information and aggregate it with information collected from other users to attempt to provide you with a better experience, to improve the quality and value of the Website, and to analyze and understand how the Website is used.

B. Usage Data

When you visit the Website, our servers automatically record information that your browser sends whenever you visit a website. The information sent automatically by your browser is referred to as “Usage Data.” This Usage Data may include information such as the manufacturer and model of your device; your Internet Service Provider (ISP); your device’s Internet Protocol (“IP”) address (or other device identifier), browser type, and operating system; referring/exit pages; clickstream data; Website access times and dates, pages of the Website that you visit, the time spent on those pages, and information you search for on the Website; and other statistics.

We use this information for technical administration of the Website, including to monitor and analyze use of the Website, to increase the functionality and user-friendliness of the Website, and to better tailor the Website to End Users’ needs.

Usage Data may be non-identifying or it may be associated with you. Whenever we associate Usage Data with Personal Information, we will treat it as Personal Information.

C. Third-Party Tracking Tools

We use Google Analytics and cookies to collect data on user activity, including IP addresses, browsing behavior, and interactions with the website. This helps us analyze and improve user experience. Additionally, third-party tracking tools may be used for website functionality and analytics.

II. Collection of Information

Acrotech may use a number of different techniques and technologies to collect Personal Information, Non-Identifying Information, and Usage Data. For example, Acrotech may use log files, clear gifs, pixel tags, embedded scripts, and/or other technology used to monitor your use of the Website.

A. Forms

We request certain information from you through the use of forms when you send us correspondence through the Website. The Contact Us form on the Website requests an End User's name and email address.

B. Tracking Technologies

We may use tracking technologies such as cookies, pixel tags, and analytics services to gather insights on user behavior. Users can control cookie settings through their browser preferences.

C. Usage Data

Usage Data are collected automatically by the Website's servers and software. For example, because the Website automatically collects Usage Data for all End Users that visit the Website, your Website session will be tracked. You agree that we may collect and use technical data and related information, including technical information about your device, system and application software, and peripherals, to maintain and support the Website generally.

Additionally, in some of our email messages, Acrotech may use a "click-through URL" linked to content on the Website. When an End User clicks onto one of these URLs, the End User will pass through our server before arriving at the destination Web page. Acrotech tracks this click-through data to help us determine End User interest in certain subject matter and measure the effectiveness of these End User communications. You can avoid being tracked in this way by not clicking text or graphic links in emails from Acrotech.

Finally, we may use clear gifs or pixel tags, which are tiny graphic images, in order: (i) to advise us of what parts of the Website End Users have visited, (ii) to measure the effectiveness of any searches End Users perform, and (iii) to enable us to send emails in a format that End Users can read and tell us whether such emails have been opened in order to ensure us that we are sending messages that are of interest to End Users.

D. Tracking

Some Web browsers may be configured to send Do Not Track signals to websites, or users may use similar mechanisms, to indicate a user's preference that certain web technologies not be used to track the user's online activity.

III. Use and Sharing of Information by Acrotech

The End User information that Acrotech collects may be added to our databases and used for business purposes, including for marketing and promotional purposes, for a statistical analysis of End Users' behavior, for product development, for content improvement, or to customize the content and layout of the Website. In addition, Acrotech will, on occasion, send emails to you about the Website or third-party products. If you do not want to receive email from us, visit the "Opt Out" or "Unsubscribe" link at the bottom of any Acrotech email to remove yourself from continued receipt of such email messages.

Acrotech's policy is not to share the End User information it collects with third parties other than as specified below, or where an End User expressly consents to our sharing of certain information with a third party. We may share End User information with third parties under the following circumstances:

A. Business Partners and Vendors

We may employ third-party companies and individuals for any of the following: to facilitate the Website; to provide the Website or portions of the Website on our behalf; to perform related services, including without limitation, maintenance services, database management, fulfillment, web analytics, and improvement of the features or functionality; or to assist us in analyzing how the Website is being used.

Under certain circumstances, you may avoid having Acrotech share your information with its business partners and vendors by not granting Acrotech permission to share your information. Not granting Acrotech permission to share your information with its business partners or vendors may limit your access to their services through the Website.

B. Business Transfers

As we continue to develop our business, we may buy, sell, or share assets in connection with, for example, a merger, acquisition, reorganization, sale of assets, or bankruptcy. In such transactions, information about End Users generally is often a transferred business asset. In the event that Acrotech itself or substantially all of Acrotech's assets are acquired, information about our End Users may be one of the transferred assets.

C. Compliance with Law and Protection of Acrotech and Others

We may release End User information when we believe, in our sole discretion, that release is appropriate: to comply with the law, including but not limited to, in response to a subpoena served on Acrotech; to enforce or apply the Agreement, including the Website Terms of Use and other applicable agreements, rules, and policies; to protect the rights, property, or safety of Acrotech, our End Users, or others; or to prevent activity that we believe, in our sole discretion, may be or may become illegal, unethical, or legally actionable (including exchanging End User information with other companies and organizations for fraud protection).

D. Aggregate Site Use Information

We may release aggregate End User information (without revealing any Personal Information about you) to advertisers and other third parties in order to promote or describe use of the Website.

E. Opt-Out Options

Users can manage cookie preferences through their browser settings or opt out of Google Analytics tracking by visiting [Google Analytics Opt-Out](#).

IV. International Transfer

By accessing and using the Website, you acknowledge and agree that Acrotech controls and operates all parts of the Website from its offices in the United States of America and that the Website is intended for use by End Users located in the United States of America. Unless expressly stated to the contrary, Acrotech makes no representation that the Website is appropriate or will be available for use in other locations.

If you access the Website from outside the United States of America, you acknowledge and agree that your information may be transferred to and maintained on computers and servers located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. Your consent to the Agreement followed by your submission of such information represents your agreement to the transfer of such information to the United States and the collection, use, and disclosure of your information in accordance with United States law and our Privacy Policy.

A. Additional Rights for California Users

If you are located in California, you may have additional rights regarding your data. A cookie consent banner will be displayed upon visiting the website.

V. Security

We and/or our online web hosting company employ administrative, physical, and electronic measures designed to protect your information from unauthorized access. For example, we and/or our online web hosting company use commercially reasonable security measures through multiple layers of security, including encryption, firewalls, 24/7 monitoring, and daily backups to protect End User information.

Please note that no security system is impenetrable. Accordingly, we do not guarantee the security of our databases, nor that information you supply won't be intercepted while being transmitted to us over the Internet or other network. Any information you transmit to Acrotech, you do at your own risk. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting through the Website in the most expedient time possible and without

unreasonable delay, as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

VI. Children's Privacy

We are committed to protecting the privacy of children. End Users must be at least thirteen (13) years of age to access and use the Website. Any access to or use of the Website by anyone under the age of thirteen (13) is unauthorized, unlicensed, and in violation of the Agreement. By using the Website, you represent and warrant that you are thirteen (13) years of age or older and that you agree to and agree to abide by all of the terms and conditions of the Agreement. If Acrotech believes that you are under the age of thirteen (13) or that you are not old enough to consent to and be legally bound by the Agreement, Acrotech may, at any time, in its sole discretion, and with or without notice: (i) terminate your access to or use of the Website (or any portion, aspect, or feature of them), or (ii) delete any content or information that you have posted through the Website.

VII. Contacting Us

If you have any questions about this Privacy Policy, please contact us at: ITDepartment@aurobindousa.com.