

PRIVACY POLICY

The privacy of your personal information (in some countries referred to as "personal data") is important to Aurora.

To better protect your privacy, we provide you with our Privacy Policy so that you will understand our commitment to privacy. This Privacy Policy describes what information we may collect about you; how we use, disclose, and store your information; how we protect it; and what choices you have on how that information is used. At Aurora we want you to feel as comfortable as possible visiting our various websites and using their respective services.

As our Privacy Policy changes in significant ways, we will make every effort to notify you of the changes. Minor changes to the policy may occur that will not affect our use of individually identifiable or personal information. As new features and functionalities are added to our websites or services, we may need to update or review the Privacy Policy and reserve the right to do so at any time, without prior notice and by posting the revised version and providing a notification of the document. In case we modify the policy in a way that your awareness of the changes shall be required, we will provide notice at the top of the Privacy Policy for at least 30 days after the new effective date so that you can see at a glance that the Privacy Policy has changed. In other cases, we may specifically ask for your consent, as required. We will post privacy policy changes on our website in a timely manner. You may choose to opt-out from the various services we offer, and we will respect your request.

The following articles make up our Privacy Policy. We hope that reading them gives you a clear idea of how we manage information regarding you.

- **Personal information we collect**
- **How we use and disclose your information**
- **How Aurora handles privacy internally**
- **Your privacy choices**
- **Updating your personal data and contacting Aurora**
- **Children's privacy**
- **California privacy rights**

When we refer to ourselves as "we" or "Aurora Pharmaceutical Inc." (company incorporated under the laws of the US, Minnesota, with address at: 1196 Hwy 3 South, Northfield, MN 55057 is the data controller for the personal information collected via www.Aurorapharmaceutical.com, or other Aurora

controlled sites, including any subsidiary or affiliated company that we control directly or indirectly. We may share information among companies that we own or control, and we may share information with our co-promotion partners, and companies working with Aurora but all information we share will always be protected under privacy terms compatible with the principle of this Privacy Policy and the law. Aurora has multiple services and websites each with their own content, features, and functionality and with different purposes, so the privacy policies may be specific to the service/site where they are posted.

You should read the relevant Privacy Policy at each website that you visit after you leave one of our sites. Aurora is not responsible for how other websites treat your privacy once you leave an Aurora site.

Personal Information We Collect

Information We Collect from Visitors

Personal information that we collect is only for specified, explicit and legitimate purposes. We will not further use personal information in any manner incompatible with the purposes outlined in this policy without notifying you. Personal information that we collect, and process must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is used.

We may collect information directly from visitors to each of our websites, as well as indirectly, through the use of cookies and other technologies. We might track information provided to us by your browser, including the website you came from (known as the referring URL), the type of browser you use, the time and date of access, and other information collected via/used by cookies. We may also collect data about the location of your PC, any logging information, information about your device, your browser and similar type of information. On some of our websites and where required, you must register to access portions of the site, and you may receive a notification regarding the purpose of the collection of your personal information.

In addition, we might gather information about you that is automatically collected by our web server, such as your IP address and domain name. Aurora may use web server and browser information to individually customize its offerings and presentations if you submit your personal information. Such customization shall be performed upon your prior consent and/or notification as required.

Information We Collect When You Register

Visitors registering for services on our websites are asked to provide identifying information, such as name, gender, and contact information. On the registration screen, we clearly label which information is

required for registration, and which information is optional and may be given at your discretion. In certain jurisdictions Aurora obtains visitors' consent before collecting personal information.

Information From Outside Sources

We may also collect information about veterinarians or other animal health care professionals who register on our websites from other sources in order to verify their licensure status and identity. In some cases, we ask customers for information after they register, such as credit card information. Where necessary (for example, to process an order for a purchase), our websites may contact financial or credit organizations to confirm customer credit card information.

From time to time, we may augment our existing user databases with legally obtained information from third parties. Some of this information may be personally identifiable, such as national change of address information. We do this to better target our information offerings and promotional campaigns and to provide pertinent offers that may be of interest to you. In certain jurisdictions, we collect your consent and/or provide you with the option to unsubscribe to any such communications at any time either by a specific link or by sending an email to: info@aurorapharmaceutical.com

Other Information

We also collect information that you voluntarily provide to us through responses to surveys, search functions, questionnaires, feedback, Tell Your Story forms and the like. We may also ask you to provide additional information such as your e-mail address if you want to obtain additional services or information or to resolve complaints or concerns. Personal information collected by us shall include a notice explaining the purpose of the collection of your personal information and include other information as required.

Use of Cookies and Other Tracking Systems

Cookies, log files, and pixel-tags (web beacons) are technologies used by Aurora websites to identify a user as the user moves through our websites. Your browser allows us to place some information (session-based IDs and/or persistent cookies) on your computer's hard drive that identifies the computer you are using. We may use cookies to personalize our websites and to track your usage across other Aurora websites.

How We Use and Disclose Your Information

Aggregate Data

We gather aggregate data about visitors to our websites for product and service development and improvement activities. We also use it for market analysis. We may provide information from our websites in aggregate form, with personal information removed, to third parties.

Marketing

We may target our marketing messaging depending on information we have about you. We may also personalize our website based on your interests. For example, you may see different articles in different places on our website based on information you have shared with us, or information we have gained by reviewing your previous visits, or information we may have gained from your interactions with a third party that shares information with us. This functionality may be possible if you either provide your consent, or if we notify you about it.

When we share information with third parties working on behalf of Aurora, we use our best efforts to assure that they agree in writing to abide by Aurora principles of the privacy policies.

If we discover that a third party working on behalf of Aurora inappropriately disclosed personal information about any of our visitors, we will take immediate action to prevent further occurrences.

Other than as described above, Aurora will not release personal information to a third party without your consent.

Tell-A-Friend (only applicable in the United States)

You are free to tell your friends about our products and services. If you choose to use our referral function to tell a friend about our site and unless your friend has asked us not to send them marketing emails already, our site will ask you for your friend's name and e-mail address as well as your information. The form automatically sends your friend a one-time e-mail inviting him or her to visit the site. We do not access or store this information, except to send this invitation. We will only do this where we have suitable permissions or you have provided appropriate permissions (for instance, you are reasonably certain that your family and / or friends would consent to receiving the marketing material in question) as are required by privacy and data protection laws. We assume that you have obtained consent from your friends to make such referral. We will ask you to provide your consent where appropriate.

Protection of Information: How Aurora Handles Privacy Internally

Our Commitment to Security

We have put in place appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect online. Please note that there is risk involved in using the internet. Thus, our goal is to provide a reasonable level of security based on general industry standards. We therefore recommend that you use every precaution to protect your information when using the internet and any other links.

General Policies

We have implemented technology and security policies, rules, and other measures to protect the personal information that we have under our control from unauthorized access, improper use, alteration, unlawful or accidental destruction, and accidental loss. We also protect your information by requiring that all our employees and others who have access to or are associated with the processing of your data respect your confidentiality.

Aurora uses security methods to determine the identity of each registered user, so that appropriate rights and restrictions can be enforced for that user. Reliable verification of user identity is called authentication. Aurora uses both passwords and usernames to authenticate users. Users are responsible for maintaining their own passwords.

Storage of Information

Personal information you share with us is transferred and stored on our database servers at Aurora data centers located in countries outside of the European Economic Area or hosted by third parties that transfer and store information on database servers located in countries outside of the European Economic Area and that have entered into agreements with us that require them to observe the principles of the Privacy Policy. We have a firewall and other technology to prevent individuals from accessing information without authorization. Data centers are designed to be physically secure and protected from unauthorized access by unauthorized persons.

Information in our data centers is backed up routinely, in order to aid in the recovery of information in the event of accidental damage of information or due to a natural disaster.

Aurora will not keep personal information in an identifiable form for longer than is necessary and for the purpose or purposes for which the data is processed, including for the purpose of satisfying any legal, accounting or reporting requirements.

Third Parties

In addition to aggregate information (discussed previously), we may share some types of information with third parties as described below. We will share information with third parties where we believe it is necessary for a legitimate purpose connected with the service we offer. In other cases, we will not share information with third parties without notifying you, and, if necessary, without, obtaining your approval.

- **Companies and people who work for us:** Because we are a large company, we contract with other companies and individuals to help us provide services. For example, we may host some of our websites on another company's computers, hire technical consultants to maintain our websites, or work with companies to remove repetitive information from customer lists, analyze data, provide marketing assistance, and provide customer service. In addition, if you are an animal health care professional, we may validate your licensure status and other information against available databases that list licensed animal health care professionals. In order to perform their jobs, these other companies may have limited access to some of the personal information we maintain about our users. Other companies may collect information on our behalf through their sites. This occasionally incorporates the use of frames on the site that will not show the URL you are visiting in the browser address window. We require such companies to comply with the terms of our privacy policies, to limit their access to any personal information to the minimum necessary to perform their obligations, and not to use the information they may access for purposes other than fulfilling their responsibilities to us. We use our best efforts to limit other companies' use of personal information.
- **Promotional and informational offers:** Sometimes we send offers to selected groups of customers. To accomplish that we may use third parties working on behalf of Aurora. We provide a variety of mechanisms for you to tell us you do not want to receive such promotional and/or informational offers. For example, we may provide an opt-in box for customers to receive information that is sent by a third-party fulfillment house, and we make clear that, by opting in, you are submitting your data to a third-party. You can elect not to receive or unsubscribe from any promotional or informational material from us by following the instructions to opt-out as mentioned or included in each of our programs we send to you.
- **Business transfers:** If we transfer a business unit (such as a subsidiary) or an asset (such as a website) to another company, we will require it to honor the terms of this Privacy Policy.

- **Legal requirements:** We may release account and other personal information when we believe release is required to comply with law.

Your Privacy Choices

You may be given the option of receiving recurring informational/promotional e-mail from Aurora and third parties working with Aurora. You may opt-out from receiving this e-mail when you provide the information or follow the instructions as mentioned in the e-mail or included in each program, we send to you. Aurora will unsubscribe you from that newsletter or other programs within ten business days.

Updating Your Personal Information and Contacting Aurora

You can always contact us in order to (i) request access to your personal information (ii) request removal of or request to restrict the processing of, the personal information that you have provided to us, (iii) update or rectify the personal information that you have provided to us, (iii) change your preferences with respect to marketing contacts, (iv) withdraw your consent, and (v) request the right to data portability, by e-mailing us at info@Aurorapharmaceutical.com. For California residents, please refer to the California Privacy Rights section below.

Filing a Complaint

You have the right to file a complaint about the processing of your data by Aurora with the relevant competent privacy supervisory authority at your country location.

Children's Privacy

We are committed to protecting the privacy of children. We do not collect personal information from any person we actually know is a child under the age of 13.

California Privacy Rights

Certain California privacy laws, including the California Consumer Privacy Act (“CCPA”), require that we provide California residents with specific information about how we use their personal information.

Categories of Personal Information that We Collect and/or Disclose

Below please find the categories of personal information about California residents that we may collect and/or disclose to third parties or service providers for a business purpose:

- **NAME, CONTACT INFORMATION AND IDENTIFIERS:** Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, or other similar identifiers.

- CUSTOMER RECORDS: Paper and electronic customer records containing personal information, such as name, signature, address, telephone number, bank account number, credit card number, debit card number, or any other financial information.
- PURCHASE HISTORY AND TENDENCIES: Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- USAGE DATA: Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a resident's interaction with an internet website, application, or advertisement.
- AUDIO/VISUAL: Photographs and videos.
- PROFILES AND INFERENCES: Inferences drawn from any of the information identified above to create a profile about a resident reflecting the resident's preferences, characteristics, and predispositions.

California Consumer Rights

If you are a resident of California, California law gives you the right to make the following requests, up to twice every 12 months:

- The right to request a copy of the personal information that we have collected about you in the prior 12 months.
- The right to request details about the categories of personal information we collect, the categories of sources, the business or commercial purposes for collecting information, and the categories of third parties with which we share information.
- The right to request deletion of the personal information that we have collected about you, subject to certain exemptions.
- The right to opt-out of sale of your personal information, in the event Aurora ever decides to sell your personal information.

You can submit a request by emailing us or by calling.

The CCPA prohibits discrimination against California consumers for exercising their rights under the CCPA and imposes requirements on any financial incentives offered to California consumers related to their personal information, unless the different prices, rates, or quality of goods or services are reasonably related to the value of the consumer's data. We do not discriminate against any consumers who elect to exercise their CCPA rights.

