

Privacy Policy

May 12, 2024

Introduction

Welcome. You have arrived at a website provided by Altoida, Inc. a Delaware corporation, (“**Altoida**,” “**Company**” or “**we**,” “**our**” or “**us**”). This Site is operated by Altoida and has been created to provide information about our Company to our visitors (“you”, “your”). We understand that privacy is important to you and want you to know that we are committed to safeguarding your Personal Information (defined below).

This Privacy Policy governs the Company’s website (including www.altoida.com), (the “**Site**”) and applies to all personally identifiable information (“**Personal Information**”) that we may collect from you. We refer to all the above as our “**Services**.”

PLEASE READ CAREFULLY PRIOR TO CONTINUING TO VIEW OUR SITE. BY ACCESSING THE SITE AND/OR USING OUR SERVICES, YOU AFFIRM THAT YOU HAVE READ, UNDERSTOOD, AND AGREE TO ABIDE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO ABIDE BY THIS PRIVACY POLICY, YOU MAY NOT ENTER, ACCESS, OR OTHERWISE USE OUR SERVICES.

DISCLAIMER

THE SITE IS NOT INTENDED TO BE A SUBSTITUTE FOR PROFESSIONAL ADVICE. THE SERVICES AND ANY CONTENT HEREIN ARE NOT INTENDED TO BE A SUBSTITUTE, NOR A REPLACEMENT, FOR PROFESSIONAL MEDICAL ADVICE, DIAGNOSIS, OR TREATMENT, AND IS NOT INTENDED TO BE, AND SHOULD NOT BE RELIED UPON OR CONSTRUED AS, THE PRACTICE OF PROFESSIONAL HEALTHCARE OR MEDICAL ADVICE OR THE PROVISION OF MEDICAL CARE.

ALTOIDA DOES NOT RECOMMEND, ENDORSE OR MAKE ANY REPRESENTATION ABOUT THE EFFICACY, APPROPRIATENESS OR SUITABILITY OF ANY SPECIFIC TESTS, PRODUCTS, PROCEDURES, TREATMENTS, SERVICES, OPINIONS, HEALTH CARE PROVIDERS OR OTHER INFORMATION THAT MAY BE CONTAINED ON OR AVAILABLE THROUGH THE SERVICE. ALTOIDA IS NOT RESPONSIBLE NOR LIABLE FOR ANY ADVICE, COURSE OF TREATMENT, DIAGNOSIS OR ANY OTHER INFORMATION, SERVICES OR PRODUCTS THAT YOU OBTAIN THROUGH THE SERVICE.

UNDER NO CIRCUMSTANCES WILL WE BE LIABLE FOR ANY LOSS OR DAMAGE CAUSED BY YOUR RELIANCE ON INFORMATION OBTAINED THROUGH THE SITE. NOTHING ON THIS SITE HAS BEEN REVIEWED BY THE FDA AND IS NOT INTENDED TO REPLACE THE ADVICE OF A LICENSED MEDICAL PROFESSIONAL. IT IS YOUR RESPONSIBILITY TO EVALUATE THE ACCURACY, COMPLETENESS OR USEFULNESS OF ANY INFORMATION, OPINION, ADVICE OR OTHER CONTENT AVAILABLE THROUGH THE SITE. PLEASE SEEK THE ADVICE OF MEDICAL PROFESSIONALS, AS APPROPRIATE, REGARDING THE EVALUATION OF ANY SPECIFIC INFORMATION, OPINION, ADVICE

OR OTHER CONTENT. NEVER DISREGARD PROFESSIONAL ADVICE, INCLUDING MEDICAL ADVICE, OR DELAY IN SEEKING IT, BECAUSE OF SOMETHING YOU HAVE READ ON THIS SITE.

What Information We Collect

a) Information You Provide to Us

We do not ask for Personal Information from you when you access the Site to visit for informational purposes.

From General Visitors to the Site:

If you choose to contact us using the Contact Us button, we will collect the following information:

- First and Last Name
- Email address
- Company Name
- Position

b) Information Collected Automatically:

However, we and/or our service providers may automatically collect and/or store certain information when you visit or interact with the Site (“Usage Information”). We may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors’ Internet service providers. It is important to note that no Personal Information is available or used in this process. This Usage Information may be stored and/or accessed from your personal computer, laptop, tablet, mobile phone or other device (a “Device”) whenever you visit or interact with our Site. Usage Information may include:

- Your IP address, IDFA, Android/Google Advertising ID, IMEI, or another unique Your Device functionality (including browser, browser language, operating system, hardware, mobile network information).
- Referring and exit web pages and URLs;
- The areas within our Site that you visit and your activities there, including remembering you and your preferences;
- Your Device location or other geolocation information, including the postal code, province / state or country from which you accessed the Services;
- Your Device characteristics; and
- Certain other Device data, including the time of day you visit our Site.

FROM JOB APPLICANTS:

If you apply for a job with us by clicking on the link on <https://jobs.lever.co/Altoida> we may ask you to provide the following information:

- Your First and Last Name,
- Email Address,
- Mailing Address
- Telephone / mobile number,
- Employment History,
- References as necessary to consider your application for open positions.

In all instances, your decision to provide us with information is voluntary. If you choose not to provide any requested information, you may not be able to take advantage of all the Site's features or our Services or obtain employment.

Cookie Policy

We may use cookies, flash cookies, local shared objects, web beacons, pixels, single pixel GIFs, clear GIFs, and/or other technologies ("Tracking Technologies") along with your information to enhance and personalize your experience and gather information that helps us optimize our Services. You can choose to accept or decline some cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, it is important to remember that some of our Services may not function properly if your cookies are disabled.

We may use Tracking Technologies for a variety of purposes, including:

- To assess the performance of the Site, including as part of our analytic practices or otherwise to improve the content, products or services offered through the Site;
- To offer you enhanced functionality when accessing the Site, including identifying you when you visit our Site or keeping track of your specified preferences or to track your online activities over time and across third-party sites; and
- To deliver content relevant to your interests on our Site and third party sites based on how you interact with our content.

To learn more about how to opt out of Google's use of the Google analytics cookies, visit <https://tools.google.com/dlpage/gaoptout>. To learn about your choices in connection with these practices on the particular device on which you are accessing this Privacy Policy, please visit <http://www.networkadvertising.org/choices> and <http://www.aboutads.info/choices>. You may also click on the informational icon contained within each interest-based ad. We do not control these opt-out links or whether any particular company chooses to participate in these

opt-out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

Please note that even if you exercise the opt-out choices above, you may continue to receive advertisements, for example, ads based on the particular website you are viewing (e.g., contextually based ads). Also, if your browser (like some Safari browsers) is configured to reject opt-out cookies when you opt out on the DAA or NAI websites, your opt-out may not be effective.

Why We Collect Personal Information

We do not collect Personal Information when you access the Site or Services for informational purposes. If you do provide us with your Personal Information when accessing our Site, we may use your Personal Information for various purposes, including:

- Responding to requests for information,
- Evaluating your employment application if you have applied for a position with us,
- Providing you with updates and information about services we provide,
- Creating user preferences regarding emails and other correspondence,
- Improving the effectiveness of our Site, our marketing endeavors, and our product offerings,
- Helping us address problems with and improve our Site and our products,
- Protecting the security and integrity of the Site, including understanding, and resolving any technical and security issues reported on our Site,
- Engaging in analysis, research, and reports regarding the use of our Site,
- For internal business purposes and our legitimate interests.
- Complying with the law and protecting the safety, rights, property, or security of Altoida, the Services, and the general public, and
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy.

When We Disclose Information

We do not sell your Personal Information to anyone. We may disclose your Personal Information in the following circumstances:

(a) **To Third Parties Providing Services to Altoida.** We may use third-party service providers to perform certain services on behalf of us or the Site or Services, such as: (i) creating and updating Site functionality; (ii) assisting us in Site operations; (iii) hosting the Site and improving performance of the Site; (iv) designing and/or operating the Site's features; (v) tracking the

Site's activities and analytics, including marketing and market research; (vi) data enhancement (to learn more about our visitors); and (viii) other services designed to assist us in maximizing our business potential.

We may provide these vendors with access to user information to carry out the services they are performing for us. Those vendors may have additional or different privacy policies and/or privacy notices. You should be sure that you read and agree to those policies and Terms.

(b) To Protect the Rights of Altoida and Others. To the fullest extent permitted by applicable law, we may also disclose your information when required to by law or if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend the rights, safety or property of Altoida, its affiliates, third parties or the general public; (ii) comply with legal and regulatory obligations (e.g., pursuant to law enforcement inquiries, subpoenas or court orders); or (iii) to respond to claims that any content violates the rights of a third party. This includes exchanging information with other companies and organizations for fraud prevention, spam/malware protection, and other similar purposes. To the fullest extent permitted by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest any requests for such disclosures, all without notice to you.

(c) In connection with a Business Transfer. We also reserve the right to disclose and transfer all information: (i) to a subsequent owner, co-owner, or operator of the Site and/or our Services; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all our interests and/or assets or other corporate change, including during any due diligence process.

(d) To Affiliates of Altoida. We may provide information to affiliates of Altoida and nonaffiliated third parties who perform services or functions for us in conjunction with our services, but only if we have a contractual agreement with the other party which prohibits them from disclosing or using the information other than for the purposes for which it was disclosed.

(e) On the Basis of Consent. Where you provide consent, we share your information as described at the time of consent, such as participating in promotional activities by Altoida partners or third parties.

(g) For Internal Business Processes and Promotion. Where permissible under applicable law, we may use certain de-identified information about you to generate leads, drive traffic to Altoida's website, or otherwise promote our products and services.

Aggregated Information

We may aggregate, de-identify, and/or anonymize any information collected through the Site or Services such that such information is no longer linked to your personally identifiable information. We may use and share this aggregated and anonymized information (non-Personal

Information) for any purpose, including without limitation, for research and marketing purposes, and may also share such data with our affiliates and third parties, including advertisers, promotional partners, and others.

Your Choices About the Personal Information We Collect

You may choose to restrict the collection or use of your Personal Information In the following ways:

- Whenever or if you are asked to fill in a form on the Site, consider what information to include and exclude.
- Some of our Services may provide you with additional information and choices about your privacy, which you should review.
- If you have previously agreed to our using your Personal Information for direct marketing purposes, you may change your mind at any time by writing to us using the contact information below.
- You can also request this by filling out a web form via our [Data Subject Access Request \(DSAR\) Portal](#).

We will try to comply with your request(s) as soon as reasonably practicable.

Administrative Correspondence. Please also note that if you do opt-out of receiving marketing-related emails from us, we may still send you messages for administrative or other purposes directly relating to your use of the Services, and you cannot opt-out from receiving those messages.

Retention of Personal Information

Altoida will retain Your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Altoida will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of the Service, or we are legally obligated to retain this data for longer time periods.

Children's Privacy

Protecting children's privacy is important to us. For that reason, no part of our Site is targeted to attract anyone under the age of 13.

Do Not Track Disclosures

Do Not Track ("**DNT**") is a web browser setting that requests that a web application disable its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites, analytics companies, ad networks, plug in providers, and other web services you encounter while browsing to stop tracking your activity. Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party websites or online services (e.g., browser do not track signals), but there is no universally agreed upon standard for what a company should do when it detects a DNT signal. Currently, we do not monitor or take any action with respect to these signals or other mechanisms.

Global Privacy Control

We recognize and honor Global Privacy Control ("**GPC**") for U.S.- based users; if GPC is enabled, we recognize this as an "opt out of the sale or sharing of personal information" or as an "opt out of targeted advertising and the sale of personal data" request (non-California U.S. residents).

Visitors to the Site Outside of the United States

If you are visiting the Site from a location outside of the U.S., your connection will be through and to servers located in the U.S. All information you receive from the Site will be created on servers located in the U.S., and all information you provide will be maintained on web servers and systems located within the U.S. The data protection laws in the United States may differ from those of the country in which you are located, and your information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Site or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information in the United States and in other countries, as set forth in this Privacy Policy.

Updating Personal Information

We prefer to keep your Personal Information accurate and up to date. If you would like to change your contact information, please contact us at contact@altoida.com

If so, we will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable (but we may retain prior information such as business records). Please note that it is not always possible to completely remove or delete all your information from our databases and that residual data may remain on backup media or for other legitimate business reasons.

In addition, please note that if you implement a deletion request but later sign up for information, your most recent request will control our information relationship with you.

Links

For your convenience, the Site(s) and this Privacy Policy may contain links to other third-party websites and to social media sites such as Facebook, Instagram, X and LinkedIn. Altoida is not responsible for the privacy practices, advertising, products, services, or the content of such other websites. None of the links on the Site(s) should be deemed to imply that Altoida endorses or has any affiliation with the links.

Because we use social media plugins, if you visit our Site while logged in to a social networking account, personally identifiable information about your browsing activities on this Website may be transferred to the third party who operates that account. See the third party's terms of service and privacy policy for more information on what information may be transferred and what you can do to avoid or limit the transfer of information.

Security

We incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission, or electronic storage of information can be guaranteed 100% secure. As a result, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you provide us with your information at your own risk.

International Data Transfers

Because Altoida works with global companies and technologies, we may transfer your Personal Information outside of the country in which it was originally provided. This may include transfers to third parties, such as developers, service providers or affiliated entities who are located outside the United States where data protection laws may not offer the same level of protection as those in the United States. When we transfer personal data outside of the United States, we take steps to make sure that appropriate safeguards are in place to protect your Personal Information.

Questions / Changes in Privacy Policy

If you have questions or concerns with respect to our Privacy Policy, you may contact us contact@altoida.com. We may elect to change or amend our Privacy Policy; in such event, we will post the policy changes in our Privacy Policy on the Site and send you an email indicating that the terms have changed. Changes will be effective on the date posted. If you are concerned about how your Personal Information is used, please visit our Site often for this and other important announcements and updates.

Contact Us

If you have any questions or comments about this Privacy Policy, or if you would like to review, delete, or update information we have about you or your preferences, requests should be submitted through our [Data Subject Access Request \(DSAR\) Portal](#).

If the Altoida DSAR portal is unavailable, requests can be sent to contact@altoida.com or to:

Altoida, Inc
80 M Street SE, Suite 100,
Washington, DC 20003 – USA

GDPR Privacy Rights

If you are a resident of or located within the EU or European Economic Area (“EEA”) or the United Kingdom, you have certain additional data protection rights under the General Data Protection Regulation (“EU GDPR”) or the UK GDPR (collectively “GDPR”). These rights include:

- The right to access, update or delete the information we have on you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Information.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine- readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where we relied on your consent to process your personal information.

Legal Basis for Processing Personal Information under GDPR

Altoida’s legal basis for collecting and using the Personal Information described in this Privacy Policy depends on the Personal Information we collect and the specific context in which we collect it.

Altoida may process your Personal Information because:

- We need to perform a contract with you;
- You have given us permission to do so;
- The processing is in our legitimate interests, and it is not overridden by your rights; or
- To comply with the law.

Disclosure of Personal Information under GDPR

Legal Requirements

Altoida may disclose your Personal Information in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of Altoida;
- To prevent or investigate possible wrongdoing in connection with the Service;
- To protect the personal safety of users of the Service or the public; or
- To protect against legal liability.

Disclosure for Law Enforcement

Under certain circumstances, Altoida may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

As specified above, to exercise any of these rights, you can submit your request by contacting the Data Subject Access Request (DSAR) Portal or by mail to Altoida, Inc., 80 M Street SE, Suite 100, Washington, DC 20003 – USA

We will respond to your privacy requests within 30 days and notify you of the action(s) we have taken or required steps to fulfill the request.

Please note that the above individual rights are not absolute, and we may be entitled to refuse requests where certain exceptions apply. Please note that where our processing of your Personal Information relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services. Should you wish to raise a concern about our use of information (without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority.