

## Privacy Policy

Last Updated April 4, 2025

ASPN Pharmacies, LLC (“**Company**” or “**we**”) respects your privacy, and we are committed to protecting it.

This policy describes the types of information we may collect that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“**Personal Information**”), which we may collect from you through this website (our “**Website**”) and as otherwise set forth below and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information.

Please read this policy carefully to understand our policies and practices regarding your Personal Information and how we will treat it. By accessing or using this Website, you acknowledge this privacy policy.

If you are a resident of California, please review the “California-Specific Privacy Information” section below for information on additional privacy rights that may apply to you.

This policy applies to Personal Information we collect about you, as set forth below. This policy does not apply to:

- De-identified or anonymized information.
- Public information or information that is not considered Personal Information.
- Employee, applicant, or contractor information.
- Information that we collect and process in providing our pharmacy services, which constitutes protected health information (“**PHI**”) as defined by the Health Insurance Portability and Accountability Act and its subsequent laws and regulations (“**HIPAA**”), which PHI is subject to our **Notice of Privacy Practices (“NPP”)** that we maintain as a covered entity under HIPAA.

### Changes to this Policy

This policy may change from time to time. All changes will be effective immediately upon posting to this Website. Material changes will be conspicuously posted on the Website or otherwise communicated to you.

### Children’s Personal Information

Our website is not intended for children under 18 years of age. No one under the age of 18 may access or use the Website. We do not knowingly collect Personal Information from children under 18. If we learn we have collected or received Personal Information from a child under 18 without parental consent, we will make a commercially reasonable effort to delete that Personal Information.

### Personal Information We Collect

We collect Personal Information directly from you, from third parties, as well as through automatic data collection technologies. We retain this Personal Information, including records and copies of your phone calls, chats, and correspondence (including email addresses) if you contact us, for as long as permitted by law.

#### Information You Provide

We collect several types of Personal Information directly from you. We collect Personal Information that you provide in your interactions with us, online or via phone. This includes:

- filling out our forms that request Personal Information;
- providing information at the time of registering for an account or registering for events,
- requesting further services, information, or customer service, such as when you report an issue on the Website, chat with us, or call us.
- contacting us via phone, chat, or other correspondence
- other Information you elect to provide, including any Personal Information provided when you contact us or provide us feedback, including responses to surveys that we might ask you to complete for research and marketing purposes.

#### Information We Collect from Other Sources

We may collect Personal Information from social media platforms. We are active on social media platforms such as Facebook, Instagram, LinkedIn, X (formerly Twitter), and YouTube. Anything you post on such public sites is public information and will not be treated confidentially. We may post (or re-post) on our website and our social media pages any comments or content that you post on social media platforms. Your use of third-party websites is governed by the privacy policies and terms of the providers that own and operate those websites and not by this Policy. We encourage you to review those policies and terms.

#### Information We Collect Through Automatic Data Collection Technologies

With the exception of tracking technologies that are strictly necessary for the Website to function, all tracking technologies are disabled on this Website unless you opt-in. For additional information on your options for tracking technologies, please [click here](#).

As you navigate through and interact with our website, we may use automatic data collection and tracking technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our website which include traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.

- Information about your computer and internet connection, including your IP address, operating system, and browser type.
- The information we collect automatically may be only statistical data and does not include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways, including Personal Information we receive from third parties.

## How We Use Your Information

We use Personal Information for the following purposes:

- To present our website and its contents to you.
- For administrative purposes, such as managing accounts.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account and respond to your inquiries about our services.
- To conduct our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.
- To notify you about changes to our Website, this Policy or our Terms of User or other terms and any products or services you receive or that we offer or provide through our website.
- To provide, improve and create new services.
- To send you electronic messages and personalized emails pertaining to the transactions and services we are providing to you.
- To statistically analyze trends and user behavior and activity including how frequently areas of the Website are visited and being used.
- To detect and defend against fraud and other threats to our services and our users.
- To identify issues with the services, maintenance and administration of our websites and your account.
- To protect our legal rights or interests, or those of other parties, including bringing legal action against you or anyone who may be causing harm to us, our website, or to other users of the Website.
- In any other way as described or obvious when you provide the Personal Information.
- For any other purpose with your consent.

Automatic data collecting and tracking technologies help us to improve our website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.

- Store information about your preferences, allowing us to customize our website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our website.

If you turn on or enable additional tracking technologies, we will use those technologies for the purposes disclosed to you.

California's "Do-Not-Track" Requirement. We currently do not respond to "do not track" requests.

#### Disclosure of Your Personal Information

We may disclose Personal Information to the following categories of third parties:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Company is among the assets transferred.
- To third parties to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep Personal Information confidential and use it only for the purposes for which we disclose it to them. For more information, see Choices About How We Use and Disclose Your Information below.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us or obvious when you provide the Personal Information.
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce or apply our **terms of use** and other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company and its affiliates, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

#### Choices About How We Use and Disclose Your Personal Information

We strive to provide you with choices regarding the Personal Information you provide for us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** The Website is configured only for cookies that are strictly necessary for the Website to function. You can change your settings to allow for additional tracking technologies. If you turn on those additional tracking technologies, you can change your settings at a later time. You can also set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function as intended.
- **Disclosure of Your Personal Information for Third-Party Advertising.** We do not disclose your Personal Information to third party advertisers unless you have provided explicit consent to do so.

### **Accessing and Correcting Your Personal Information**

If you have an account with us, you may review and change certain Personal Information associated with your account by logging into the Website and visiting your account profile page.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

### **Data Security**

We have implemented measures designed to help secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our website, which is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

### **Access Outside the United States**

If you access the Website from outside the United States, please be aware that Personal Information may be transferred to, stored in, and processed in the United States. Certain governmental authorities may not consider the level of protection of Personal Information in the United States to be equivalent to that required by the in other jurisdictions.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

200 Park Avenue  
Suite 300  
Florham Park, NJ 07932  
Attn. Compliance Department  
OR  
(973) 564-8004  
ComplianceReview@asembia.com

## **California**

Under the CCPA, California consumers have the right to receive certain disclosures regarding our information practices related to “Personal Information,” as defined under the CCPA. To the extent you are a resident of California, and we collect Personal Information subject to CCPA, the following applies:

### **Categories of Personal Information**

In the last twelve (12) months, we have collected the following categories of Personal Information under CCPA:

- Identifiers consisting of real name, postal address, unique personal identifier, internet protocol address (“IP Address”), email address, account name, and mobile phone numbers.
- Consumer information under Cal. Civ. Code 1798.80(e) consisting of: credit card number, debit card number, signature, physical characteristics, or descriptions (i.e., sex, height and weight, race, and ethnicity), telephone number, health insurance number, insurance policy number, and medical information.
- Protected Classifications consisting of: Age, race, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), and genetic information (including familial genetic information).
- Commercial Information consisting of: Commercial information, including records of customer billing information, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies with respect to the services.
- Internet Activity consists of information regarding a consumer’s interaction with an internet website.

### **Categories of Sources from which Personal Information is Collected**

We collect Personal Information from the categories listed in the “Personal Information We Collect” section above.

### **Purposes for Collecting Personal Information**

We collect Personal Information for the purposes listed in the “How We Use Your Information” section above.

### **Disclosures to Third Parties**

In the last 12 months, we have disclosed all categories of the Personal Information to the categories of third parties identified in the section titled “Disclosure of Your Personal Information”.

### **Categories of Personal Information Sold or Shared**

We do not “sell” or “share” Personal Information. As a result, we do not have actual knowledge that we sell or share any Personal Information about individuals that are under sixteen (16) years old.

### **Sensitive Personal Information**

We do not collect any Sensitive Personal Information. As a result, we do not use or disclose any Sensitive Personal Information for any purpose beyond the purpose for which we collect it.

### **Retention**

We retain Personal Information only for the minimum amount of time for which we need it for the purpose for which it was collected or as required by law.

### **California Privacy Rights**

California consumers have the following rights regarding Personal Information:

- **Right to Know:** You have the right to request from us information on : (i) the categories of Personal Information about you we have collected; (ii) the categories of sources from which we have collected that Personal Information; (iii) our business or commercial purposes for collecting, selling, or sharing, that Personal Information; (iv) the categories of third parties to whom we have disclosed that Personal Information.; and (v) the specific pieces of Personal Information we have collected.
- **Right to Correct:** You have the right to request that we correct inaccuracies in your Personal Information.
- **Right to Delete:** You have the right to request the deletion of Personal Information that we have collected from you.
- **Right to Non-Discrimination:** You have the right to non-discrimination, and we will not discriminate against you for exercising any of the rights described in this section.

To make a request for the rights described above, please contact us at ComplianceReview@asembia.com, by telephone at (973) 564-8004, or at Asembia Compliance, 200 Park Ave, Suite 300, Florham Park, NJ 07932. Please indicate you are making a request pursuant to your “California Privacy Rights.” You must provide us with the following information: (1) first and last name; (2) email address; and (3) physical address. We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your request or, where necessary, to process your request. If we are unable to adequately verify a request, we will notify the requestor.

You may only make a request on behalf of yourself unless you are a parent or legal guardian in which case you may make a request on behalf of the data subject you represent in that capacity. You also have the right to subject requests through an authorized agent. If an authorized agent contacts us on your behalf, we will need to verify their identity, as well as your identity. We will also require proof of their authorization to act on your behalf to make the specific request submitted, unless the agent is subject to a Power of Attorney under California probate laws, in which case we may require evidence of that status.