



Consumer Health Data Privacy Policy

Last updated on June 17, 2024.

This Consumer Health Data Privacy Policy applies to personal information defined as “consumer health data” as defined under US state privacy laws, including Washington’s My Health My Data Act and Nevada’s consumer health privacy law.

Scope

This Consumer Health Data Privacy Policy (this “Policy”) describes how Sprout Pharmaceuticals, Inc. (“Sprout”, “we”, “our”, or “us”) collects, uses, shares, and otherwise processes consumer health data in connection with www.sproutpharmaceuticals.com or any other website which links to or displays this Policy and mobile versions of the website, by email, by phone, or other offline method, or anywhere else we display this Policy (collectively, the “Platform”).

In this Policy, when we use the term “consumer health data,” we mean personal information that is linked or reasonably linkable to an individual who acts in an individual or household context and that identifies such individual’s past, present, or future physical or mental health status. “Consumer health data” does not include publicly available information, aggregated, deidentified or anonymized information that is maintained in a form that is not reasonably capable of being associated with or linked to you or your device (and certain measures are taken for ensuring compliance), information about individuals acting in the employment context, or personal information that is used to engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws and is approved, monitored, and governed by an institutional review board, human subjects research ethics board, or a similar independent oversight entity that determines that we have implemented reasonable safeguards to mitigate privacy risks associated with research, including any risks associated with reidentification.

Consumer Health Data We Collect, Use Cases, and Data Sharing

The table below describes the categories of consumer health data collected and the purpose for which the data is collected and purpose for which it will be used or shared; the categories of such data that are shared; and the categories of third parties and specific affiliates with whom we share consumer health data.

Category of Consumer Health Data	Purposes for Collection, Use or Sharing & Manner of Processing	Categories of Third Parties or Affiliates With Whom Consumer Health Data Is Shared
Information about your health-related conditions, treatments, diseases, or diagnoses	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the	Service Providers or Contractors; Research Organizations or Agencies; Analytics Vendors; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies



Category of Consumer Health Data	Purposes for Collection, Use or Sharing & Manner of Processing	Categories of Third Parties or Affiliates With Whom Consumer Health Data Is Shared
	security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	
Social, psychological, behavioral, and medical interventions	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	Service Providers or Contractors; Research Organizations or Agencies; Analytics Vendors; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies
Health-related surgeries or procedures	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	Service Providers or Contractors; Research Organizations or Agencies; Analytics Vendors; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies
Use or purchase of prescribed medication	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or	Service Providers or Contractors; Research Organizations or Agencies; Analytics Vendors; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies



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	other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	
Bodily functions, vital signs, symptoms or health measurements	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	Service Providers or Contractors; Research Organizations or Agencies; Analytics Vendors; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies
Diagnoses or diagnostic testing, treatment, or medication	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	Service Providers or Contractors; Research Organizations or Agencies; Analytics Vendors; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies
Reproductive or sexual health information	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet	Service Providers or Contractors; Research Organizations or Agencies; Analytics Vendors; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies



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	legal requirements, establish, or defend a legal claim	
Biometric data	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	Service Providers or Contractors; Research Organizations or Agencies; Marketing / Advertising / Media Agencies; Analytics Vendors; Retail Merchandising Vendors; Fulfillment Partners; Marketing Mix Measurement Providers; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies
Data that identifies an individual seeking health care services	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet legal requirements, establish, or defend a legal claim	Service Providers or Contractors; Research Organizations or Agencies; Marketing / Advertising / Media Agencies; Analytics Vendors; Retail Merchandising Vendors; Fulfillment Partners; Marketing Mix Measurement Providers; Data Management Platforms; Third-Party Health Care Providers; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies
Information derived or inferred from nonhealth information	To provide you with information, products, or services or otherwise respond to your requests; to communicate with you about our products or services or other offerings we think may be of interest to you; to promote our products; to conduct market research; to improve the Platform, products, and services; to provide technical support; to protect the security and integrity of the Platform and our internal systems; to prevent fraud or other prohibited or illegal activity; to meet	Service Providers or Contractors; Research Organizations or Agencies; Marketing / Advertising / Media Agencies; Analytics Vendors; Retail Merchandising Vendors; Fulfillment Partners; Marketing Mix Measurement Providers; Data Management Platforms; Affiliates; Law Enforcement; Regulatory Bodies; Government Authorities; Government Agencies



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	legal requirements, establish, or defend a legal claim	

Sources of Consumer Health Data

We (or our service providers) collect consumer health data when you interact with us on the Platform, including interacting with a chatbot or responding to an email.

Subject to your device settings, Sprout will automatically collect consumer health data when you interact with the Platform on any device, when you click on sponsored links or third-party ads to visit the Platform, and we may also collect consumer health data about you over time and across different websites and devices when you use the Platform, using tracking technologies such as cookies, pixels, Flash objects, and we may use third party services to collect this consumer health data when you use the Platform.

Third-Party Tracking

We limit third party collection of consumer health data over time and across different websites while you use the Platform for the third parties. Where third-party cookies, pixels or tracking technologies are enabled on the Platform, we require such third parties to act as our service providers. However, third parties may still be able to collect consumer health data from you over time and across different websites depending on your browser, browser add-ons, and permissions you set on your device used to access the Platform. Such collection by third parties is not related to Sprout's collection of consumer health data from you. We encourage you to view the privacy notices of those third parties for more information about their data practices and your privacy choices regarding those activities.

Consumer Health Data Rights

We offer certain privacy rights regarding your consumer health data as set forth below, subject to certain limitations at law.

- Right to confirm whether Sprout is collecting, sharing, or selling consumer health data concerning you
- Right to access your consumer health data, including a list of all third parties and affiliates with whom Sprout has shared or sold your consumer health data and an active email address or other online mechanism that you may use to contact these third parties
- Right to withdraw consent from Sprout's collection and sharing of your consumer health data
- Right to request deletion of your consumer health data

How to Exercise Your Consumer Health Data Rights

Please submit a request by emailing us at info@sproutpharma.com.



We may need to authenticate your identity and request before processing it, which may require us to obtain additional personal information from you. In order to authenticate your identity, we will generally require the matching of sufficient information you provide us to the information we maintain about you in our systems. Please provide your name and email address in the original request, as well as an explanation of the rights you wish to exercise. If you do not provide this information, we may not be able to verify or complete your request in all circumstances.

In certain circumstances, we may decline a request to exercise the rights described above, in accordance with applicable law.

Right to Appeal

In certain circumstances, we may decline a request to exercise the rights described above. If your request is denied, we will provide an explanation for the denial and instructions on how you may appeal a denied request. You may appeal a denied request by contacting us info@sproutpharma.com. If your appeal is unsuccessful, Washington residents can raise a concern or lodge a complaint with the Washington State Attorney General at www.atg.wa.gov/file-complaint and Nevada residents can raise a concern or lodge a complaint with the Nevada State Attorney General at https://ag.nv.gov/Complaints/File_Complaint/.

Changes in Policy

From time to time, we may change this Policy. We will notify you of any material changes to this Policy as required by law. We will also post an updated copy of this Policy on the Platform. Please check the Platform periodically for updates.