## Lang Pharma Nutrition, Inc. Privacy Policy

EFFECTIVE DATE: May 1, 2022 LAST UPDATED: May 6, 2022

Lang Pharma Nutrition, Inc. ("we," "us," or "our") values your privacy. In this Privacy Policy ("Policy"), we describe how we collect, use, and disclose information that we obtain about visitors to our website <a href="https://www.langpni.com/">https://www.langpni.com/</a> (the "Site" and corporate offices (collectively, the "Services") as well as information about collection of information from Lang Pharma Nutrition, Inc. employees.

- 1. Scope and Consent. By visiting the Site, you acknowledge that your personal information will be handled as described in this Policy. As used herein, "personal Information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person. Your use of our Services and any dispute over privacy is subject to this Policy, including any applicable limitations on damages and the resolution of disputes.
- 2. Information Practices: How We Collect, Use, Retain, and Disclose Personal Information. The information we collect through the Site is controlled by Wix.com, which is headquartered in the Tel Aviv, Israel with a primary United States address of 500 Terry A. Francois Boulevard, San Fransisco, CA 94158.
- **The Information We Collect About You.** We collect information about you directly from you and from third parties, as well as automatically through your use of our Services.
  - 3.1 Information We Collect Directly From You through the Site. The information we collect from you depends on how you use our Site. When you contact us through the Site, we may collect identifiers such as your name, email address, company name, phone number, and your reasons for contacting us.
  - 3.2 Information We Collect Automatically. We automatically collect the following identifiers and internet or other electronic network activity information about your use of our Site through cookies, web beacons, and other technologies: your domain name; your browser type and operating system; web pages you view; links you click; your IP address; the length of time you visit our Site and; and the referring URL, or the webpage that led you to our Site. We may combine this information with other information that we have collected about you, including, where applicable, your user name, name, and other personal information. Please see the section "Our Use of Cookies and Other Tracking Mechanisms" below for more information.
- **4. How We Use Your Information.** We may use your information, including your personal information, for the following purposes:
  - 4.1 To provide our services, to communicate with you about your use of our Site or services, to respond to your inquiries, and for other customer service purposes.
  - 4.2 To tailor the content and information that we may send or display to you, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the Site.
  - 4.3 To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal processes; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.

4.4 To protect the safety, rights, property, or security of **Lang Pharma Nutrition, Inc.**, our services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity that **Lang Pharma Nutrition, Inc.**, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; to conduct audits; and to enforce this Policy or our Terms of Use.

## 5. How We Share Your Information.

- 5.1 We share your information, including personal information, as follows:
  - 5.1.1 **Affiliates**. We may disclose the information we collect on the Site to our affiliates or subsidiaries for the purposes described in this Policy; however, if we do so, their use and disclosure of your personal information will be subject to this Policy.
  - *5.1.2 Other Providers*. We may disclose the information we collect from you to third -party vendors, service providers, contractors or agents who perform functions on our behalf.
- 5.2 We also may disclose information in the following circumstances:
  - 5.2.1 **Business Transfers.** If we are or may be acquired by or merged with another company, if any of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.
  - 5.2.2 *In Response to Legal Process*. We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal processes, such as in response to a court order or a subpoena.
  - 5.2.3 **To Protect Us and Others**. We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which **Lang Pharma Nutrition, Inc.** is involved.
  - 5.2.4 **Aggregate and De-Identified Information**. We may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.
- **6. Data Retention.** Your information will be retained in accordance with our data retention policy which is designed to retain data for as long as needed for us to comply with our contractual obligations and other business purposes to retain data.
- **7. Sale of Personal Information.** We do not sell your information for money but we and our business partners use tracking technologies to help us to understand our customers and visitors to the Services, to enhance your online experience, and customize our offerings in ways that may be deemed a "sale" of personal information under the CCPA. This includes working with third parties such as ad networks which collect personal information via tracking technologies to serve personalized advertisements on and off our Services, provide us with data collection, reporting, ad response measurement. To the extent we or our partners use such technologies on the Services, we offer an opt-out as discussed below in Section 12.
- **8. Our Use of Cookies and Other Tracking Mechanisms.** We and our third-party service providers may use cookies and other tracking mechanisms to track information about your use of our Site.

- **8.1 Cookies.** Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to understand aggregated activities at our Site.
- **8.2 Disabling Cookies.** Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.
- 8.3 Service Provider Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Site. We use these tools to help us improve our Site, performance, and user experiences. These entities may use cookies and other tracking technologies to perform their services. To learn more about Google's privacy practices, please review the Google Privacy Policy at <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.
- **9. Third-Party Links.** Our Site may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.
- **10. Security of My Personal Information.** We have implemented reasonable security measures to protect the information we collect from unauthorized access, exfiltration, theft, loss, misuse, disclosure, alteration, or destruction. Please be aware that despite our best efforts, no data security measures can guarantee security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

- **11. Children's Privacy.** Our Site is not directed to children under the age of sixteen (16), nor do we market products or services to such children. We request that children do not provide personally identifiable information through our Site. We do not knowingly collect information from children under 16 without parental consent.
- **12.** California Residents: Choices for Access, Deletion, and Right to Non-Discrimination. If you are a California resident, you have the right to know what personal information we collect, use, disclose or sell about you under the California Consumer Privacy Act ("CCPA"). Additionally, you have the right to access and delete your personal information. To exercise these privacy rights and choices, please follow the instructions below:
  - 12.1 How to request access to your personal information: You may request access to your personal information twice in a 12-month period. To do so, please contact Lang Pharma Nutrition, Inc. by sending an email to: <a href="legal@langpni.com">legal@langpni.com</a>. This report will be delivered by mail or electronically at your request. Note, we may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.
  - 12.2 How to request deletion of your personal information: You may request that Lang Pharma Nutrition, Inc. delete the personal information it has collected and/or maintained about you. To do

so, please contact Lang Pharma Nutrition, Inc. by sending an email to: <a href="legal@langpni.com">legal@langpni.com</a>. Note, we may need to retain certain personal information as permitted by law, such as to complete the transaction for which the personal information was collected, provide a requested good or service, detect security incidents, protect against malicious, deceptive, fraudulent or illegal activities, comply with legal obligations or to enable solely internal uses that are reasonably aligned with your expectations or lawful within the context in which you provided the information.

12.3 How to opt-out of the sale of personal information: We offer an opt-out from the use of cookies and other tracking technologies in connection with our Services, which may in some cases constitute the sale of your personal information under the CCPA or other privacy laws. This will cause information to cease to be added to any cookies or other tracking technologies that have been set on our Services or block them entirely. Please note that you will need to opt out again if you visit one of our Services from a different device or browser of if you clear your cookies.

We reserve the right to charge a fee where permitted by law, for instance, if your request is manifestly unfounded or excessive. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

*Verification:* Please note, we will take steps to verify your identity before fulfilling any of the above requests. We will request a copy of your identification with your California residency as well as request you to verify through an authentication e-mail.

Authorized Agents: Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your or your minor child's personal information. In order to designate an authorized agent to make a request on your behalf, you must provide written proof that you have consented to this designation unless the agent has power of attorney pursuant to California Probate Code sections 4000-4465. You must also verify your identity directly with us by providing a copy of your government issued identification.

Response Timing and Format: We will respond to a verified consumer request for personal information within 45 days of receipt. If we require more time (up to 90 days), we will notify you of the reason and extension period in writing.

Anti-Discrimination Right: You have the right to be free from discrimination in product quality, goods or services if you choose to exercise your privacy rights under the CCPA.

Do Not Track: Your browser may deliver a "Do-Not-Track ('DNT') signal" to this Site. We will honor a "Do-Not-Track" signal as a valid opt-out request.

- **13. Contact Us.** If you have questions, comments, or concerns about the privacy aspects of our Site or if you have a disability and need access to this privacy policy, please, please email us at <a href="mailto:legal@langpni.com">legal@langpni.com</a> or call at 1-401-848-7700.
- **14. Changes to this Policy.** This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Site.