

Privacy Notice – XIAFLEX REMS Program

Effective Date: July 13, 2018

The Xiaflex REMS Program (“we” or “Program”) values the trust that patients, pharmacies, healthcare providers and governmental agencies place in us to appropriately use and protect personal information. This Privacy Notice informs visitors and regular users of the Xiaflex REMS Program website (“website”) about the purposes for which we may collect, use and share personal information and how it is protected. We want you to be clear how we’re using personal information and the ways in which we protect this information. By using our website, you accept the privacy practices presented in this Privacy Notice. We encourage you to read this Privacy Notice in full to understand our privacy practices before using this website or submitting any personal information.

Scope

This Privacy Notice applies only to the Xiaflex REMS Program website (www.xiaflexrems.com).

Personal Information We Collect

When you use this website, we may collect personal information about you. Personal information is any information accessed, collected, or used by us that identifies an individual, or can reasonably be used to identify an individual, whether directly or indirectly. The personal information we may collect includes, but is not limited to:

- Name
- User ID and password
- Contact information, such as business address, phone number or email address
- Professional and employment information, such as occupation and title
- User behavioral information, such as browser type, login-logout info, pages visited, number of visits, errors, crash rate, or other user activities
- Information about you from external sources that is combined with information we already have about you.

Tracking Technologies We Use

We use various technologies to collect personal information about visitors and users of this website. These technologies include the following:

- We use tracking technologies such as Webtrends. These technologies are used to analyze trends, track your movement through this website, and perform diagnostic services such as error reporting to improve this website. We receive reports based on the use of tracking technologies from Webtrends on an aggregated basis.
- We also use local storage such as HTML5 to collect and store content information and preferences. Third parties who we partner with to provide certain features on our site use local storage such as HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5 local storage.

How We Respond to “Do Not Track” Signals

Some web browsers have a "Do Not Track" feature. This feature allows you to tell websites you visit that you do not want to have your online activity tracked over time and across websites. These features are not yet uniform across browsers and not broadly supported. This website is not currently set up to respond to those signals.

How We Use the Personal Information Collected

We may use the personal information we collect for purposes such as:

- Reporting or data analytics services
- Customer and troubleshooting support
- Marketing notices, newsletter, or communications via email
- Marketing initiatives via surveys
 - If you participate in surveys, we will request certain personal information from you. Participation in these surveys is completely voluntary and you have a choice whether to disclose this information. We may use a third-party service provider to conduct these surveys. We will not share the personal information you provide through a survey with other third parties unless we give you prior notice and choice.
- Error detection and debugging

How We Share Personal Information Collected

- This Program does not sell personal information about you to third parties.
- We may provide your personal information to third parties that provide services to help us with our business activities such as marketing notices and marketing initiatives. These companies are authorized to use personal information about you *only as necessary* to provide these services to us.
- Some of our pages may utilize framing techniques to serve content to/from our partners while preserving the look and feel of our website. Please be aware that you are providing personal information to these third parties and not directly to the Program. When framing techniques are utilized, your personal information is subject to the privacy practices of the third party.

The Program may also need to share information with companies, organizations or individuals outside of the Program if we have a good faith belief that access, use, preservation, or disclosure of that information is reasonably necessary to:

Meet applicable laws, regulations, legal processes or enforceable governmental requests

- Enforce applicable Terms of Service, including investigation of potential violations
- Detect, prevent, or otherwise address fraud, security or technical issues
- Protect against harm to the rights, property or safety of our users, the Program, or the public as required or permitted by law
- Engage in a merger, acquisition, reorganization, or sale of all or a portion of the Program assets.

Your Choice

Where appropriate or legally required, we will describe how your information that we collect through our website will be used and will provide choices about whether to allow us to engage in that use. To exercise your choice, you may discontinue information collection by discontinuing accessing the website or by voluntarily opting out of the Program altogether.

If you wish to subscribe to our newsletter, we will use your name and email address to send the newsletter to you. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, or by accessing the email preferences in your account settings page.

Access to Personal Information

This website allows you to directly view and edit information about you through your profile settings.

We will retain your personal information for as long as your account is active, as reasonably useful for commercial purposes, or as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Health Insurance Portability and Accountability Act ("HIPAA")

As a provider of services and technology to the healthcare industry, this Program has implemented programs to address the privacy and security requirements of HIPAA.

Children's Privacy

This website is not intended for any user under the age of 13, and we do not knowingly collect personal information from children under the age of 13. We request that children under the age of 13 not submit any personal information through this website.

How We Protect Your Information

We have established appropriate physical, electronic and administrative safeguards to protect the information we collect from or about our users. We restrict access to personal information to the Program employees, contractors and agents who need to know that information to process it for us, and who are subject to confidentiality obligations.

Any sensitive personal information (e.g., passwords, patient health information) will be transmitted in an encrypted form using SSL encryption. Notwithstanding our security safeguards, it is impossible to guarantee 100% security in all circumstances. If you have any questions about security or have reason to believe that your interaction with us is no longer secure (for example, you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting 1-877-313-1235

Changes to this Privacy Notice

We may periodically update this Privacy Notice to describe new features, products or services we offer and how it may affect our use of personal information about you and your controls. Since we may change this Privacy Notice, we recommend that you check the current version available from time to time. If we make changes to this notice, we will update the "Effective Date" at the beginning of this notice.

Contact Information

If you have questions or concerns about this Privacy Notice, our information handling practices, or any other aspect of privacy and security of your personal information, please contact us at 1-877-313-1235.

You may also write to us at:

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