# Privacy Policy

Thank you for visiting *https://colospan.com/* (together with all content on the website and other websites operated by Colospan, Ltd. or its affiliates ("Colospan") (the "Site")). Your privacy is important to us. To better protect your privacy, we provide this privacy policy ("Privacy Policy") explaining our online information practices and the choices you can make about the way your information is collected and used at this Site. This Privacy Policy form is part of the Terms of Use, available at *https://colospan.com/.*

**Introduction**

We are committed to respecting your online privacy and recognize your need for appropriate protection and management of any personal data you share with us.

“Personal Data” means any information that may be used to identify an individual, either directly or indirectly, including, but not limited to, a first and last name, pen name, personal profile, a home or other physical address and an email address or other contact information.

We do not require you to provide personal data in order to have access to information available on our Site. Your personal data will be collected only if you provide your personal data when you communicate with us. If you are a visitor from the EU you will not have access to the online clinical study application questionnaire. This questionnaire is intended only for US visitors.

**The Way We Use Personal Information**

If you submit personal data to us through the Site, then we will use your personal data to improve our services to you, to contact you in case you submit a request for information and to identify and authenticate your access to the Site’s services that you are authorized to access.

We may transfer your personal data within Colospan or to Colospan’s third-party service providers, but only to provide services on the Site or to you, across borders, and from your country or jurisdiction to Israel, where Colospan is established. Israel has been recognized by the European Commission as a country providing an adequate level of data protection.

In addition, Colospan works with vendors located in the US. Any personal data submitted through the Site will be also stored and processed in the US. Your personal data will, therefore, be transferred to the US. You should be aware that the laws of the US countries are not considered by the European Commission to provide a level of protection equivalent to the laws of the European Economic Area (EEA) and the national laws of the different EU Member States. However, Colospan will take reasonable steps and have agreements in place to ensure that any personal data transferred to the US are treated securely and in accordance with this Privacy Policy and to the extent permitted by law.

Finally, we may process your personal data on other legal bases, e.g. i) if this is necessary to comply with any applicable law, regulation, legal process or governmental request to which we are subject, ii) if the processing is necessary in order to protect your or another natural person's vital interests; or iii) if the processing is necessary for the purposes of Colospan legitimate interests.

**Cookies and Other Tracking Technologies**

Some of our Site pages utilize "cookies" and other tracking technologies. A "cookie" is a small text file that may be used, for example, to collect information about Site activity. Some cookies and other technologies may serve to recall personal data previously indicated by a Site user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them.

You may choose to accept cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter certain identifying information, should we in the future require such information, to gain access to certain parts of the Site.

Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our Site is accessed. Our use of cookies and other tracking technologies allows us to improve our Site and your web experience.

**Notice**

Except as set forth in this Privacy Policy, we do not currently provide your personal data to third parties. Nevertheless, we may at a later time choose to make certain offers or services available to our users from third parties. If we do, during the registration process and at certain points thereafter in connection with specific offers, we may ask you whether your personal data may be sent to third parties who have products, services and opportunities which may be useful to you. If you give your permission to allow third parties to contact you, your personal data (such as your contact information and other information collected during your visit to our Site) may be shared with data aggregators, marketers (possibly in the form of list rental), and other organizations. Colospan does not intend to transfer personal data without your consent to third parties who are not bound to act on Colospans' behalf unless such transfer is legally required. Regardless of your decision regarding the sharing of your personal data, we may share broad aggregate demographic data and related usage information with our business partners. This aggregate information does not contain any personal data that can identify an individual user.

**Choice**

You may choose whether or not to provide personal data to Colospan. The notices we will provide where Colospan collects personal data on the Site should help you to make this choice. If you choose not to provide the personal data we request, you can still visit most of the Site, but you may be unable to access certain options, offers, and services that involve our interaction with you.

**Access/Accuracy**

To the extent that you do provide us with personal data, Colospan wishes to maintain accurate personal data, which you may verify or update. If you would like to review or edit your personal data you can email us at dataprotection@colospan.com. Please note that this is a dedicated email address for use only for the purpose of reviewing and editing your personal data. Colospan cannot respond to mails sent to this address that contain questions concerning any other subjects and/or contain your personal data.

To the extent permitted by applicable law, you may have the right to access the personal data that we hold about you and to request that we correct, amend, delete it if it is inaccurate or processed in violation of applicable law, you also have the right to restrict colospan's use of your personal data; the right to object to the processing of your personal data and the right to receive your personal data in a usable electronic format and transmit it to a third party (right to "data portability").

If you would like to request access to, correction, amendment, or deletion of your personal data, you can submit a written request to dataprotection@colospan.com. To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access to or making any changes to your personal data. If we deny your request, we will provide you with a written explanation of the reasons for our determination.

Colospan is committed to working with you to obtain a fair resolution of any complaint or concerns about privacy that you may have. If, however, you believe that Colospan has not been able to assist with your complaint or concern, you have the right to make a complaint with the competent authority of the EU Member State where you reside or work or where you believe that your rights have been infringed.

Please note that any removal of content by us does not ensure or guarantee complete or comprehensive removal of the content in all places. The content may have been shared or reposted by other parties, or the applicable laws may require maintenance of the content or information.

**DATA SECURITY AND RETENTION**

We use, implement, and maintain industry standard technological security measures that are reasonably designed to help protect your personal data from loss, unauthorized access, or disclosure both in storage/rest and in transmission. We use secured socket layer (SSL) encryption to help prevent unauthorized access to personal data you transmit to the Site. Once information is received by us, it is stored on a secured server behind a firewall. Information collected through the Site is processed and stored in Israel and the United States.

While we take the issue of protecting your personal data seriously, you should exercise discretion in what information you transmit to the Site. No transmission sent over the Internet can be guaranteed to be fully secure, and therefore the transmitted information may be intercepted by others before it reaches us. If you are concerned about sending information to us over the Internet, please call us to make other arrangements. We are not responsible for the security of information sent over the Internet.

Please note that we will retain collected information connected to business records for periods of time required by law. We will store and retain your personal data in accordance with applicable laws.

**Collection of Information by Third-Party Sites**

Our Site may use a reputable third party to present or serve advertisements that you may see at our Site. These third-party ad servers may use cookies, web beacons, clear gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third-party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy.

**Links to Other Sites**

Our Site may contain links to other sites. Other sites may also reference or link to our Site. We are not responsible for the privacy practices or the content of such other sites.

**Children's Privacy**

The Site is not structured to attract children under the age of 18. Accordingly, we do not intend to collect personal data from anyone we know to be under 18 years of age. If we learn that any personal data was provided through the Site by a person younger than 18 years of age, we will make commercially reasonable efforts to delete such personal data promptly.

**Data Controller**

We are the data controller, as that term is used in applicable data protection laws, for any personal data that we collect from you.

**In the Event of Merger, Sale, or Bankruptcy**

In the event that Colospan is acquired by or merged with a third-party entity, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from our users as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we will make efforts to ensure that you are informed of relevant changes concerning the processing of your personal data.

**Commitment**

We are committed to protecting your privacy. Protecting your privacy online is an evolving area, and Colospan’s Sites are constantly evolving to meet these demands. If you have any comments or questions regarding our

Privacy Policy or its implementation, please contact us at dataprotection@colospan.com. **While we cannot guarantee privacy perfection, we will address any issue to the best of our abilities as soon as possible.**

**Your Consent**

By using this Site, you consent to the terms of our Privacy Policy and to Colospnan's processing of personal data for the purposes given above. If you do not agree to this Privacy Policy, please do not use our Site. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. If any changes to this Policy affect how we treat or handle personal data already provided to us by you, we will use commercially reasonable efforts to notify you by email (if Colospan has a valid email address to use) and give you thirty (30) days to withdraw your consent to the processing of your personal data or to exercise your right to object.