

SinaPharm Co. Ltd. Privacy Policy

By visiting our website, you are accepting the practices described in this Privacy Policy.

1. Overview

SinaPharm Co. Ltd. and its Affiliates (collectively and individually, the "SinaPharm Co. Ltd." are concerned about its users and protection of their private information. Accordingly, SinaPharm Co. Ltd. has created this Privacy Policy (the "Policy") that applies to the services offered by SinaPharm Co. Ltd., including this website (the "Services").

SinaPharm Co. Ltd. strongly encourages each of its website users to take the time and become familiar with this Policy as, by using this website, you consent to the collection and use of information as set forth herein (which you may withdraw at any time).

The Policy is designed to provide you with information on how we are following the rules for data protection: which information we gather while you are browsing our website or using the Services and how this information or personal information you provided to us when creating a SinaPharm Co. Ltd. account by registering on our website or when issuing a request for information form, is used. In the event that SinaPharm Co. Ltd. desires to use a user's Personal Information (as defined below) in a manner beyond those set forth in this Policy, SinaPharm Co. Ltd. will provide you with notice and, where required under applicable data protection law, ask for your consent or give you the opportunity to "opt-out" of such purposes by using the means offered for a specific Service or by sending an email to privacy@sinapharm.com.

On our webpage there may be links to webpages, tools or services owned or offered by third parties. Third party providers may provide some services such as credit card, registration, payment or settlement services and, if used, such services may be subject to such third party provider's privacy policies. This Privacy Policy does not apply to such webpages, tools or services and SinaPharm Co. Ltd. expressly disclaims any responsibility for them or for Personal Information provided by a user through them.

2. Personal Information

"Personal Information" means information that can directly or indirectly lead to the identification of a living person, such as an individual's name, address, IP address, e-mail, telephone number, license number, medical identification number, photograph, financial account information or other identifying characteristic. The identification can occur by reference to one or more factors specific to the individual's physical, physiological, mental, economic, cultural or social identity. Personal Information does not include information that has been anonymized.

3. Collecting Personal Information

When a user creates a SinaPharm Co. Ltd. account, issues a request for information form or when the user orders products or accesses any of the Services, the user will be required to provide certain Personal Information.

SinaPharm Co. Ltd. collects Personal Information that users provide to us on our websites, which may include:

- Contact information – such as name, job title, company name, department, email address, physical mailing address and telephone number, as well as any other contact information provided in a contact form, registration or application process, during tradeshows or other events, or in connection with customer information Services;
- Professional information – such as your employment background, job description and related information, testimonials, references, as well as any other information provided during a registration or application process;
- Transaction information – such as your contact information, the products you are interested in, your purchasing requirements, your financial information including credit card or other payment information, purchase history, shopping cart information and information provided to customer service personnel or through customer service tools of SinaPharm Co. Ltd.;
- Responses to surveys – information you provide in responding to a survey on the website, via an app or email, on the telephone or otherwise, including responses provided through third party survey services used by SinaPharm Co. Ltd.;

While SinaPharm Co. Ltd. takes appropriate measures to provide accuracy in the handling of Personal Information, SinaPharm Co. Ltd. relies entirely on its users to maintain correct

Personal Information and to update this information as appropriate.

In addition, when a user accesses SinaPharm Co. Ltd. website, the servers automatically record information provided by the user's browser. Generally, this information is automatically provided by a user whenever a user accesses any website. This information, recorded in a server log, may include a user's particular information (including, without limitation, IP address, browser software, language, date/time of access and other information and/or cookies that will uniquely identify a user's computer and the Internet browser the user is using). SinaPharm Co. Ltd. may also collect Personal Information about a user in connection with the user's use of the Services by using cookies on its website(s) as provided for in SinaPharm Co. Ltd. Cookies Policy.

Additionally, whenever you send an email to SinaPharm Co. Ltd., SinaPharm Co. Ltd. will retain that email so that SinaPharm Co. Ltd. can investigate and respond to your concerns. We may also use publicly accessible information to verify information we have been provided and to manage and expand our business.

4. Processing and Use of Personal Information

Personal Information collected through this website is utilized by SinaPharm Co. Ltd. only as set forth in this Policy and in order to fulfill your requests for products and services, to contact you, to conduct research, and to provide Services to users, including, without limitation, delivering enhanced Services and demonstrating functionality of the Services. SinaPharm Co. Ltd. may also use Personal Information submitted to send you information on products and promotions, provided that you have subscribed to SinaPharm Co. Ltd. news updates on any of its website(s). In particular, SinaPharm Co. Ltd. as well as its service providers, consultants and agents may use your Personal Information for the following purposes:

- To process applications of candidates for open positions at SinaPharm Co. Ltd.;
- To provide the information, services or support you request and related after-sales services;
- To identify you, and to contact you from time to time with product or service updates;
- To send other messages that are useful to the service we provide;
- To manage our relationship with you and to carry out any related administration;
- To promote our services, events, conferences, or the services, events, conferences of our partners, including by email, telephone and via social media platforms;
- To compare information for accuracy, and verify it with third parties;
- To detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful and to enforce our Privacy Policy and/or our terms or any other purpose referenced herein or therein;
- To carry out research, including market research, statistical research on website traffic, sales and other commercial information to assist us in improving the services we provide to you and tailor the website(s).

In case a user explicitly consented that we use, in accordance with this Privacy Policy, Personal Information the user provided to us when registering on our website or when issuing a request for information form, such Personal Information may be associated with information we obtained by using certain cookies as provided for in the Cookies Policy in more detail. This applies to cookies we use in order to coordinate the site functionality, performance related cookies, cookies used for advertising purposes and our lead generation process or when the user checked a "remember me" box on any of SinaPharm Co. Ltd. websites. In the event a user does not wish that we use its Personal Information in this way, the user may withdraw consent at any time with effect for the future by contacting SinaPharm Co. Ltd. as set out in Section 12 below.

SinaPharm Co. Ltd. is concerned about a user's Personal Information. Therefore, SinaPharm Co. Ltd. will only share a user's Personal Information under limited scenarios. Those scenarios include sharing it: (i) in accordance with this Privacy Policy; (ii) with a user's consent; (iii) within the SinaPharm Co. Ltd. of companies for the purposes set forth in this Privacy Policy; (iv) with SinaPharm Co. Ltd. third party services providers, consultants or agents for the purposes set forth in this Privacy Policy; (v) when required by law or public policy; (vi) in connection with actual or proposed litigation, or to protect our property, security, people and other rights or interests, or (viii) when it seeks to enforce its terms and conditions.

You may have accessed our website(s) through a hyperlink from the website of one of our trading partners. If so, you consent to your personal details and purchase information, including behavioral patterns, being shared with that trading partner in accordance with our contractual relationship with them.

SinaPharm Co. Ltd. may, from time-to-time, share with third parties information that contains non-Personal Information if you have asked us to share data with third party websites (such as social media sites), their servers may not be secure. Note also that, despite the measures taken by us and the third parties we engage, the internet is not secure. As a result, others may nevertheless unlawfully intercept or access private transmissions or data.

If any part of the SinaPharm Co. Ltd. is sold, or some of its assets transferred to a third party, your Personal Information, as a valuable asset, may also be transferred to the acquirer, even if they are not in the same line of business as us. Our customer database could be sold separately from the rest of the business, in whole or in a number of parts. Potential purchasers and their advisors may have limited access to data as part of the sale process. However, use of your personal information will remain subject to this Privacy Policy. Similarly, your Personal Information may be passed on to a successor in interest in the unlikely event of a liquidation, bankruptcy or administration.

Please remember that when you share information publicly on a SinaPharm Co. Ltd. website, for example a comment on a blog post, it may be indexable by search engines, including Google, which may mean that the information is made public.

5. Security and Data Retention

SinaPharm Co. Ltd. takes all reasonable technical and organizational measures to guard against unauthorized or unlawful processing of your Personal Information and against accidental loss or destruction of, or damage to your Personal Information. While no system is completely secure, we believe the measures implemented by the website reduce SinaPharm Co. Ltd. vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place to protect our user database and access to this database is restricted internally. To ensure the security and confidentiality of Personal Information that SinaPharm Co. Ltd. collects online, we use data networks protected by industry standard firewall and passwords. In the course of handling your Personal Information, SinaPharm Co. Ltd. takes measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

However, it remains your responsibility:

- Where you have a user account for the SinaPharm Co. Ltd. website:
 - To log off or exit from the website when not using it;
 - To ensure no-one else uses the website while your device is logged on to the website (including by logging on to your device through a mobile, Wi-Fi or shared access connection you are using);
 - To keep your password or other access information secret. Your password and log in details are personal to you and should not be given to anyone else or used to provide shared access for example over a network. You should use a password which is unique to your use of the website – do not use the same password as you use for another website or email account; and,
 - To maintain good internet security. For example if your email account or Facebook account is compromised, this could allow access to your account with us if you have given us those details and/or permitted access through those accounts. If your email account is compromised, it could be used to ask us to reset a password and gain access to your account with us. You should keep all of your account details secure. If you think that any of your accounts have been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. You should also tell us as soon as you can so that we can try to help you keep your account secure and if necessary warn anyone else who could be affected.

SinaPharm Co. Ltd. does not sell, rent or trade any of your Personal Information to third parties without your consent. Personal Information is not transferred to third parties unless provided for otherwise in this Privacy Policy. SinaPharm Co. Ltd. may store Personal Information with a third party in encrypted form on secure servers.

For the purpose of sending e-mailings to you provided that you have subscribed to SinaPharm Co. Ltd. news updates on the website, SinaPharm Co. Ltd. may give your name and email address to agencies appointed by SinaPharm Co. Ltd. These agencies are not authorized to store and/or use your Personal Information for any other purposes than for the sending of e-mailings on behalf of SinaPharm Co. Ltd.

We will retain your Personal Information for as long as necessary for processing purposes for which they were collected, processed and/or used and any other associated purposes (for example certain transaction details and correspondence may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data). Therefore, if information is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period one that period expires. We restrict access to your Personal Information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your Personal

Information that is no longer needed is either irreversibly anonymized (and the anonymized information may be retained) or securely destroyed.

6. Personal Information of Children

Without a parent's or guardian's consent, no Personal Information should be submitted to our website by children. SinaPharm Co. Ltd. will not knowingly collect or use Personal Information from children under the age of sixteen (16) years.

7. Your Rights

If you have given permission, we may contact you by [*specify, e.g.* mail, telephone, SMS, text/picture/video message, fax, email about products, services, promotions, special offers, events, webcasts, conferences and charitable causes that may be of interest to you. If you prefer not to receive any direct marketing communications from us, you can opt out at any time.

In addition, to the extent permitted by the laws of your country, you may have the right to object to the processing of your Personal Information for direct marketing purposes. If your objection is not to direct marketing in general, but to direct marketing by a particular channel e.g. email or telephone, please specify the channel you are objecting to.

Further, to the extent permitted by the laws of your country, you may also have the right to access, correct, delete, restrict, be forgotten, or object to processing of, or request data portability of the Personal Information collected about you subject to some conditions and exceptions.

You can find out more about these rights in the EU by reading the General Data Protection Regulation here: <http://www.eugdpr.org/the-regulation.html>.

If you wish to inquire about any of this please send an email to privacyofficer@sinapharm.com.

You also have the right to lodge a complaint with a data protection regulator.

8. Cookies

We use cookies on the websites as described in our Cookies Policy. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

9. Export of Personal Data from the EEA or Switzerland

Personal information collected in the territory of the European Economic Area (EEA) or Switzerland may be accessed in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export Personal Information to these jurisdictions. In countries which have not had these approvals, (see the full list here http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), we will transfer Personal Information only subject to European Commission approved contractual terms that impose equivalent data protection obligations directly on the recipient unless we are permitted under applicable data protection law to make such transfers without such formalities.

All SinaPharm Co. Ltd. companies may be granted access to Personal Information collected by any of the SinaPharm Co. Ltd. companies for the purposes set forth in this Privacy Policy. If required for the provision of the Services and subject to the limited purposes set forth herein, SinaPharm Co. Ltd. may share your Personal Information with third party services provider, consultants or agents. Where SinaPharm Co. Ltd. companies or third party services provider, consultants or agents are located outside of the EEA or an approved third country, any transfer of Personal Information will be subject to the conditions set forth above.

10. Google Analytics – Statement

SinaPharm Co. Ltd. websites uses Google Analytics, a web analytics service provided by Google, Inc. ("Google").

Google Analytics uses “cookies”, which are text files placed on your computer, to help the websites analyze how users use such sites. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For more information, please visit [Google’s privacy page](#).

11. Modifications to the Policy

SinaPharm Co. Ltd. reserves the right to change its Privacy Policy at any time. SinaPharm Co. Ltd. encourages all users to bookmark this page and check it occasionally for updates. The current version of this Policy can always be found at the end of the document. SinaPharm Co. Ltd. will endeavor to maintain all prior versions of this Policy.

12. Compliance

SinaPharm Co. Ltd. will perform random self-audits in order to review its compliance with the Privacy Policy. Should you have any questions regarding this Policy and SinaPharm Co. Ltd. use and/or treatment of a user’s Personal Information contact SinaPharm Co. Ltd. at privacy@sinapharm.com.

Upon receipt of an inquiry or complaint, SinaPharm Co. Ltd. will contact the user regarding the inquiry or complaint and take appropriate measures to address the user’s concerns.

13. Contact

The SinaPharm Co. Ltd. company operating this website is the data controller of your Personal Information processed by us under this Privacy Policy. If you have any additional questions or concerns about this Privacy Policy, please feel free to contact us any time at privacy@sinapharm.com.

Last update: May 25, 2018