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1. Information Security

Spire Sciences, Inc (Spire Sciences) values its user's privacy. This Privacy Policy ("Policy") will help you understand how we collect and use personal information from those who visit our website and make use of our online facilities and services, and what we will and will not do with the information we collect. Our Policy has been designed and created to ensure those affiliated with Spire Sciences, Inc. of our commitment and realization of our obligation not only to meet, but to exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. If at any point in time, Spire Sciences decides to make use of any personally identifiable information on file, in a manner significantly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to whether to permit the use of their information in this separate manner.

This Policy applies to Spire Sciences, and it governs any and all data collection and usage by us. Through the use of www.spireciences.com, you are therefore consenting to the data collection procedures expressed in this Policy.

Please note that this Policy does not govern the collection and use of information by any company that Spire Sciences does not control, nor by individuals not employed or managed by us. If you visit a website that we mention or link to, be sure to review its privacy policy before providing the site with information. It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent to better understand the way in which websites garner, make use of and share information collected.

Specifically, this Policy will inform you of the following:

- What personally identifiable information is collected from you through our website;
- Why we collect personally identifiable information and the legal basis for such collection;
- How we use the collected information and with whom it may be shared;
- What choices are available to you regarding the use of your data; and
- The security procedures in place to protect the misuse of your information.

2. Information Security Team

The Information Security team is accountable for enhancing, operating and continually refining Spire Sciences information security to uphold the availability, confidentiality and integrity of its data.

3. Information We Collect

It is always up to you whether to disclose personally identifiable information to us, although if you elect not to do so, we reserve the right not to register you as a user or provide you with any products or services. This website collects various types of information, such as:

- Information automatically collected when visiting our website, which may include cookies, third party tracking technologies and server logs.

In addition, Spire Sciences may have the occasion to collect non-personal anonymous demographic information, such as age or gender, as well as type of browser you are using, IP address, or type of operating system, which will assist using providing and maintaining superior quality service.

4. Why We Collect Information and For How Long

We are collecting your data for the following reasons:

- For authentication-to ensure that you are authorized to view the data
- To communicate with you by phone, email or fax, to carry out our part in the clinical trials.

The data we collect from you will be stored for no longer than necessary. The length of time we retain said information will be determined based upon the following criteria; the length of time your personal information remains relevant; the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations; any limitation periods within which claims might be made; any retention periods prescribed by law or recommended by regulators, professional bodies or associations; the type of contract we have with you, the existence of your consent, and our legitimate interest in keeping such information as stated in the Policy.

5. Use of Information Collected

Spire Sciences does not now, nor will it in the future, sell, rent or lease any of its customer lists and/or names to any third party.

Spire Sciences may collect and may make use of personal information to assist in the operation of our website and to ensure delivery of the services you need and request. At times, we may find it necessary to use personally identifiable information as a means to keep you informed of other possible products and/or services that may be available to you from www.spiresciences.com. Spire Sciences may also be in contact with you with regards to completing surveys and/or research questionnaires related to your opinion of current or potential future services that may be offered.

6. Disclosure of Information

Spire Sciences may not use or disclose the information provided by you except under The following circumstances:

- as necessary to provide services or products you have ordered;
- in other ways described in this Policy or to which you have otherwise consented;
- in the aggregate with other information in such a way so that your identity cannot be reasonably determined;
- as required by law, or in response to a subpoena or search warrant;
- to outside auditors who have agreed to keep the information confidential;
- as necessary to enforce the terms of service;
- as necessary to maintain, safeguard and preserve all rights and property of Spire Sciences, Inc.

7. Non-marketing purposes

Spire Sciences greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (such as bug alerts, security breaches, account issues, and/or changes in Spire Sciences products and services). In certain circumstances, we may use our website, newspapers, or other public means to post a notice.

8. Children under the age of 13

Spire Sciences website is not directed to, and does not knowingly collect personal identifiable information from, children under the age of thirteen (13). If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we shall immediately take the necessary steps to ensure that such information is deleted from our system's database, or in the alternative, that verifiable parental consent is obtained for the use and storage of such information.

9. Unsubscribe or Opt-Out

All users and visitors to our website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our website please send an email that you wish to unsubscribe to admin@spiresciences.com. If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe or opt-out. Spire Sciences will continue to adhere to this Policy with respect to any personal information previously collected.

10. Links to Other Websites

Our website does not contain links to affiliate and other websites. Spire Sciences does not claim nor accept responsibility for any privacy policies, practices and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our website and to read the privacy statements of every website that collects

personally identifiable information. This Privacy Policy Agreement applies only and solely to the information collected by our website.

11. Notice to European Union Users

Spire Sciences operations are located primarily in the United States. If you provide information to us, the information will be transferred out of the European Union (EU) and sent to the United States. (The adequacy decision on the EU-US Privacy became operational on August 1, 2016. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes. It allows the free transfer of data to companies that are certified in the US under the Privacy Shield.) By providing personal information to us, you are consenting to its storage and use as described in the Policy.

12. Your Rights as a Data Subject

Under the regulations of the General Data Protection Regulation (“GDPR”) of the EU you have certain rights as a Data Subject. These rights are as follows:

- The right to be informed: this means we must inform you of how we intend to use your personal data and we do this through the terms of this Policy.
- The right of access: this means you have the right to request access to the data we hold about you, and we must respond to those requests within one month. You can do this by sending an email to admin@spiresciences.com.
- The right to rectification: this means that if you believe some of the data we hold is incorrect, you have the right to have it corrected. You can do this by logging into your account with us, or by sending us an email with your request.
- The right to erasure: this means you can request that the information we hold be deleted, and we will comply unless we have a compelling reason not to, in which case you will be informed of same.
- The right to restrict processing: this means you can change your communication preferences or opt-out of certain communications. You can do this by sending an email to admin@spiresciences.com.
- The right to data portability: this means you can obtain and use the data we hold for your own purposes without explanation. If you wish to request a copy of your information, contact us at admin@spiresciences.com.
- The right to object: this means you can file a formal objection with us regarding our use of your information with regard to third parties, or its processing where our legal basis is our legitimate interest in it. To do this, please send an email to admin@spiresciences.com.

In addition to the rights above, please rest assured that we will always aim to encrypt and anonymize your personal information whenever possible. We also have protocols in place in the unlikely event that we suffer a data breach, and we will contact you if your personal information is ever at risk. For more details regarding our security protections see the

section below or visit our website at www.spiresciences.com.

13. Security

Spire Sciences takes precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar of your web browser. And looks for <https://> at the beginning of the address of the webpage.

14. Infrastructure and Data Centers

Spire Sciences products are hosted with some of the largest data center and cloud hosting providers. Access to these data centers is strictly controlled and monitored by 24x7x365 with onsite security staff, biometric scanning, and video surveillance. Our hosting service providers and data center vendors maintain multiple certifications for their data centers including ISO 27001 and SOC reports. Formal reviews on each of our infrastructure providers are undertaken

15. Encryption

Spire Sciences employs strong encryption protocols to secure data during transmission and storage. Our encryption methods ensure that sensitive information remains confidential and protected from unauthorized access. Customer data is isolated and maintained separately from other data, requiring additional authentication and authorization to access.

16. Access Control

Spire Sciences uses access mechanisms to restrict access to accounts and data only to authorized personnel

17. Penetration testing and vulnerability scanning

Spire Sciences conducts regulator vulnerability scans across the network. Additionally, we perform penetration testing through our in-house security team no less than annually.

18. Personnel security

Spire Sciences has created a culture where security is everyone's responsibility, and all employees are encouraged to help secure our data and assets. Our employees go through background screening prior to onboarding. Additionally, all Spire Sciences employees undergo regular security and privacy awareness trainings.

19. Backup

Spire Sciences runs scheduled backups of files, databases, configurations and servers. Backups are encrypted and stored offsite in a separate physical location. A formal Disaster Recovery Plan is in place.

20. Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier for each visitor. The website is then able to recognize repeat users and track usage patterns to better serve visitors when they return to that website. Cookies do not extract personal data, and most browsers provide a simple procedure that enables users to control whether they want to receive cookies or notify them when a website is about to deposit a cookie file. You can instruct your browser to refuse all cookies to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our site.

21. Third Party Cookies

We use certain third-party services on our website to organize, monitor, and analyze log data. Third-party services include the following: Google OAUTH2 Authentication which is used to authenticate authorized portal users. Anonymous users of the spiresciences.com website cannot access the portal, and are not tracked by Spire Sciences.

22. Acceptance of Terms

By using this website, you are hereby accepting the terms and conditions stipulated within the Privacy Policy Agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our sites. In addition, your continued use of our website following the posting of any updates or changes to our terms and conditions shall mean that you agree and acceptance of such changes.

23. How to Contact Us

If you have any questions or concerns regarding the Privacy Policy Agreement related to our website, please feel free to contact us at the following email, telephone number or mailing address.

Email: admin@spiresciences.com

Phone: 510-915-0915

Mailing Address:

Spire Sciences, Inc.

5314 Boca Marina Cir N

Boca Raton, Florida 33487

The data controller responsible for your personal information for the purposes of GDPR compliance is:

Peter Countryman
Peter.countryman@spiresciences.com