

Privacy Policy

Effective date: April 9, 2019

Thank you for visiting this website (this “Site”), which is owned and operated by Functional Neuromodulation, Ltd. (“Functional Neuromodulation,” “we,” “us,” and “our”)

Scope of This Policy

This online privacy policy (this “Policy”) applies only to information collected through the website on which it is posted. It does not apply to third-party platforms or to other Functional Neuromodulation-operated websites or other Functional Neuromodulation-operated platforms on which it is not posted. It also does not apply to information collected through other channels, such as over the phone or in person, or as part of a clinical study.

Some of the information we collect through this Site may be “personal information”—information that identifies you personally, alone or in combination with other information available to us. Other information may be non-personally identifiable, such as information collected by cookies.

This Policy may be supplemented or amended from time to time by additional privacy notices (“Privacy Notices”), provided at the time we collect your information. For example, certain pages of this Site may contain Privacy Notices providing more details about the information we collect on those particular pages, why we need that information, and choices you may have about the ways we use that information. In other cases, specific Privacy Notices may be required to comply with the privacy laws of one of the countries, provinces, or states in which we do business.

Your Consent

By using this Site, you are consenting to the collection, use, disclosure, and transfer of your information as described in this Policy (and any Privacy Notices that apply to you). If you do not consent to the collection, use, disclosure and transfer of your information as described in this Policy (and any Privacy Notices that apply to you), you may not use this Site. If you have questions about this Policy, or any Privacy Notice, please contact us using the information provided below.

Our Terms of Use

This Policy is part of the Terms of Use that govern your use of this Site. A link to our Terms of Use is provided at the bottom of each page of this Site.

Your Choices

In General. We respect your right to make choices about the ways we collect, use, and disclose your information. This Policy describes some of your choices, such as your choice to opt out of receiving “cookies.” We may ask you to indicate your choices at the time and on the page where you provide your information.

Do Not Track Mechanisms. California law requires this Policy to address how we respond to any “Do-Not-Track (‘DNT’) signal” delivered by your browser. Because of the changing state of technology and indecision within the industry regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.

Previously Expressed Preferences. You may change previously expressed preferences regarding how we use your information. If at any time you wish to be taken off our mailing lists, please contact us using the information provided below.

This Policy May Change

Functional Neuromodulation reserves the right to update or modify this Policy and any Privacy Notice, at any time and without prior notice, by posting the revised version of the Policy or Privacy Notice on this Site. These changes will only apply to the information we collect after we have posted the revised Policy or Privacy Notice on this Site.

Your use of this Site following any such change constitutes your agreement that all information collected from or about you after the revised Policy is posted will be subject to the terms of the revised Policy. You may access the current version of this Policy at any time by clicking on the link marked “Privacy” at the bottom of each page of the public areas of this Site.

Information We Collect

Personal Information You Manually Provide.

Functional Neuromodulation collects the information you manually provide (using your keyboard, mouse, or touchpad) when you use this Site, for example, we collect the information you provide if you choose to complete a pre-screening questionnaire entitled, “Am I a Candidate?” or similar questionnaire, contact us with questions, or otherwise interact with this Site. Some of the information you may choose to manually provide will be personal information, such as your name and contact information, whether you are age 65 or older and other information regarding your qualification for a clinical study.

Information from your browser or device.

Functional Neuromodulation collects information that is sent to us automatically by your web browser or mobile device. This information typically includes your IP address, the name of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. The information we receive may depend on your browser or device settings. The information we receive from your web browser and device typically is not, in and of itself, personally identifiable. However, we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you.

Information Collected by Cookies and Other Technologies.

We use “cookies” and other technologies to collect information and support certain features of this Site. For example, we may use these technologies to:

- collect information about the ways visitors use this Site—which pages they visit, which links they use, and how long they stay on each page
- support the features and functionality of this Site—for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits
- personalize your experience when you use this Site; and
- improve our marketing efforts, including through use of targeted advertising.

The information we collect using cookies and similar technologies is not, in and of itself, personally identifiable, but we may link it to personal information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit this Site, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

Information About Third-Party Cookies

In addition to the cookies Functional Neuromodulation delivers to your computer or mobile device through this Site, certain third parties may deliver cookies to you for a variety of reasons. For example, we use Google Analytics, a web analytics tool that helps us understand how visitors engage with our Sites. To learn more about Google Analytics, [click here](#).

Other third parties may deliver cookies to your computer or mobile device for the purpose of tracking your online behaviors over time and across nonaffiliated websites and/or delivering targeted advertisements either on this Site or on other websites.

You have choices about the collection of information by third parties on our Sites. For example, if you don’t want information about your visit to this Site sent to Google Analytics, you may download an Opt-out Browser Add-on by [clicking here](#). Please note that the Add-on does not prevent information from being sent to Functional Neuromodulation.

In addition, if you would like to opt-out of having interest-based information collected by certain entities during your visits to this Site or other websites, please [click here](#). You will be directed to an industry-developed website that contains mechanisms for choosing whether each listed entity may collect and use data for online behavioral advertising purposes. It may be that some of the third parties that collect interest-based information on this Site do not participate in the industry-developed opt-out website, in which case the best way to avoid third-party tracking of your online behaviors may be through your browser settings and deletion of cookies. Please note that the industry-developed opt-out mechanism is device and browser specific. If you wish to opt-out from having interest-based information collected by participating entities across all devices and browsers, you need take the steps outlined above from each device and browser.

How We Use Your Information

We use the information we collect through this Site to identify potential participants in clinical studies.

How We Share Your Information

With Third-Party Vendors. Functional Neuromodulation shares information collected through this Site with third-party vendors who act for us or on our behalf including Credent Partners USA, LLC,. For example, we may use third-party vendors

such as Credent Partners USA, LLC to design and operate this Site; to conduct surveys and clinical studies; and to help us with our promotional efforts. These third-party vendors may need information about you to perform their functions on our behalf. In general, we require our third party service providers and vendors to restrict their use of any personally identifiable information received through our Site to the intended purposes.

With Third-Party Social Media Platforms. We may also use third-party social media platforms to offer you interest-based ads. To offer such ads, we may convert your email address into a unique value which can be matched by our partner company with a user on their platform. Although we do not provide any personal information to these platform vendors, they may gain insights about individuals who respond to the ads we serve.

For the Purpose of Determining your Eligibility for a Clinical Study. If you choose to provide information through our Site to see if you qualify to participate in a clinical study, we may share your information with business partners or potential study center(s) so that they may contact you to see if you are a suitable candidate for one of our clinical studies. We require such business partners or potential study centers to restrict their use of any personally identifiable information received through our Site to the intended purposes.

In Aggregate or De-Identified Form. We use information collected through this Site to create a compiled, aggregate view of usage patterns. We may share aggregate information with third parties for various purposes including so they can better understand our user base. We may also share with third parties information about how particular individuals use this Site, but only on a de-identified basis (“Individualized Data”). Individualized Data is not personally identifiable, but it does reflect the usage patterns of a particular Site user, as opposed to Site users collectively. For clarity, we may use and share aggregated or de-identified data without restriction.

As Part of a Business Transfer. Your information may be transferred to successor organization if, for example, we transfer the ownership or operation of this Site to another organization or if we merge with another organization or liquidate our assets. If such a transfer occurs, the successor organization’s use of your information will still be subject to this Policy and the privacy preferences you have expressed to us.

To Comply with Laws and Protect Our Rights and the Rights of Others. We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of this Site; to enforce or apply our online Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

As Described in a Privacy Notice or Click-Through Agreement. We reserve the right to disclose your information as described in any Privacy Notice posted on a page of this Site where you provide that information. By providing your information on that page you will be consenting to the disclosure of your information as described in that privacy notice. We also reserve the right to disclose your information as described in any click-through agreement to which you have agreed.

How We Protect Your Information

Functional Neuromodulation takes reasonable precautions to provide a level of security appropriate to the sensitivity of the information we collect. Hypertext Transfer Protocol Secure (HTTPS) is a variant of the standard web transfer protocol (HTTP) that adds a layer of security on the data in transit through a secure socket layer (SSL) or transport layer security (TLS) protocol connection. This Site, questionnaire forms on the Site and our backup site are all HTTPS, meaning all information and data is fully encrypted end-to-end. Although we use reasonable measures to help protect your information against unauthorized use or disclosure, we cannot guarantee the security of information provided over the Internet or stored in our databases and will not be responsible for breaches of security beyond our reasonable control.

Children’s Privacy

You must be at least 13 years old to have our permission to use this Site. We do not knowingly collect, use or disclose personal information about visitors under 13 years of age. If you are under the age of 13, please do not use this Site. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we have received or collected information from or about a child under the age of 13 through the Site, please contact us at info@mildalzheimersstudy.com.

California Privacy Notice

California Civil Code Section § 1798.83 provides certain rights to California residents, including the right to request information from a business, with whom the California resident has an established business relationship, regarding the business’s disclosure of personal information to third parties for their direct marketing purposes during the immediately preceding calendar year. To make such a request pursuant to Section 1798.83 of the California Civil Code, please send an email to info@mildalzheimersstudy.com.

Links to Other Websites

This Policy applies only to the Functional Neuromodulation-operated websites on which it is posted. Functional Neuromodulation and its affiliates may operate different websites for different purposes and in different countries, where different laws may apply. If you visit another Functional Neuromodulation website, please take a moment to review the privacy policy posted on that site to learn what information may be collected through that site and how it is processed.

This Site may also contain links to websites that are not operated by or on behalf of Functional Neuromodulation or its affiliates. These links are provided for your reference and convenience only and do not imply any endorsement of the products sold or information provided through these websites, nor any association with their operators. Functional Neuromodulation does not control these websites and is not responsible for their data practices. Any information you provide to third parties on their websites is covered under their privacy and data collection policies and is not covered by this Policy. We urge you to review the privacy policy posted on any site you visit before using the site or providing any personal information.

Access to Your Information

If you would like to review, correct and update the personal information you have provided to us through this Site, please contact us using the information provided below. We will respond to your request within a reasonable time or within the time limit set out by applicable privacy law. We will use reasonable efforts to comply with your request, as required by applicable law.

Retention of Personal Information

Functional Neuromodulation retains the personal information collected on this Site as long as necessary to fulfill the purpose for which it is collected or as permitted by applicable law.

US Audience Only; Server Locations

Functional Neuromodulation is a U.S. company. The clinical trials described on the Site will be conducted only in the United States and this Site is intended only for a U.S. audience. We do not seek personal information on website users, or individuals who are interested in our services who reside outside of the United States. The servers that support this Site and on which we store the information you provide to us through this Site are located in the United States and the European Union. By using this Site you consent to the processing and storage of your information in the United States and the European Union.

Governing Law

This Policy shall be governed under the laws of the State of Minnesota, United States of America without regard to its conflicts of law provisions.

Questions about this Policy or Functional Neuromodulation's Data Practices

If you have questions or concerns about this Policy, any Privacy Notice, or Functional Neuromodulation's data practices with respect to this Site or the clinical studies it describes, please contact us by email at info@mildalzheimersstudy.com