

# Privacy Policy

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This Privacy Policy (“Policy”) describes how Otsuka America, Inc. (“OAI,” “we,” “us,” or “our”) collects, uses, discloses and retains personal information about visitors to our website [www.otsuka-america.com](http://www.otsuka-america.com) (the “Site”). This Policy also describes the rights you may have regarding our processing of your personal information under applicable local law.

**California Residents:** This Policy describes how we collect, use, disclose, sell, share, and retain your personal data. For additional information relating to your rights and our processing of your personal information, please navigate to the [Additional Disclosures Under Applicable Law](#) Section below.

By accessing the Site, you acknowledge and agree that your personal information will be handled as described in this Policy. Your use of the Site, and any dispute over privacy is subject to this Policy and our Terms of Use, including its applicable limitations of liability. The OAI [Terms of Use](#) are incorporated by reference into this Policy.

You may download a printable copy of this Policy (PDF): [here](#).

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## What’s in this Policy?

Categories of Personal Information We Collect About You  
How We Use Your Information  
How We Disclose the Information We Collect  
Additional Disclosures Under Applicable Law  
Security of My Information  
Third Party Links  
Children  
Contact Us  
Changes to this Policy

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## Categories of Personal Information We Collect About You

Depending on your interaction with us, we may collect the following categories of personal information about you directly from you and automatically through your use of our Site.

- **Identifiers**, such as your name, address, phone number, or email address.
- **Internet or other electronic network activity**, such as your browser type and operating system; web pages you view, links you click, and other information regarding your interaction with an internet website, email, or newsletter; the length of time you visit our Site; and the referring URL, or the webpage that led you to our Site.

Information We Collect Directly From You. We collect personal information directly from you when interact with us, such as when you provide us with information through the Site or contact us by phone, mail, email, or fax. If you contact us, we may collect your contact information (e.g., name, address, phone number, or email address), the contents of a message or attachments that you may send to us, and other information you choose to provide.

Information We Collect Automatically. We automatically collect personal information when you use our Site, such as your IP address and the types of personal information described above as “Internet or other electronic network activity.”

## **How We Use Your Information**

Depending on your interaction with us, we may use the categories of personal information described above for the following business purposes:

- To provide our services and fulfill your requests. We use your information to provide and maintain our Site and services, to process and fulfill your requests, to communicate with you about your use of our Site and services, to respond to your inquiries, and for other customer service purposes. For example, we may use your information to have printed materials shipped to you or to administer surveys.
- To improve our services. We may use your information to operate and improve our business, including to maintain our programs, accounts, and records, for research purposes, and to understand your satisfaction with our products and services.
- Combining information. We may merge, co-mingle, or otherwise combine information, including your personal information, in furtherance of the purposes described in this Policy.
- To comply with legal obligations. We may use your information to comply with our legal obligations or to exercise or defend our rights or the rights of a third party, including complying with law enforcement or government authority requests and participating in compliance audits.
- To protect us and others. We may use your information where we believe necessary to investigate, prevent, or take action regarding suspected or actual illegal activities, fraud, situations involving potential threats to the safety of any person or to otherwise enforce this Policy, our Terms of Use, and the integrity of the Site or services.
- Deidentified data. We may also deidentify or anonymize your data in such a way that you may not reasonably be re-identified by us or another party, and we may use this deidentified data for any purpose permitted under applicable law. To the extent we deidentify any data originally based on personal information, we will maintain and use such data in deidentified form and will not attempt to reidentify the data.

## How We Disclose the Information We Collect

We may disclose each of the categories of personal information described above for our business and commercial purposes as follows:

- **Related Entities.** We may disclose the personal information we collect about you to our parent, affiliate, subsidiary, and related entities.
- **Service Providers.** We may disclose the personal information we collect about you to service providers, contractors, and agents who perform functions and business operations on our behalf. For example, we engage service providers to help audit our interactions and transactions with you, address security, fix errors, help with our internal research, and verify service quality and safety.

We may also disclose your personal information in the following circumstances:

- **Business Transfers.** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected about you to the other company. As part of the business transfer process, we may disclose certain of your information to lenders, auditors, and third party advisors, including attorneys and consultants.
- **In Response to Legal Process.** We may disclose your personal information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We disclose your personal information where we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and Deidentified Information.** We may disclose aggregate, anonymized, or deidentified information about you for any purpose permitted under applicable law.
- **Consent.** We may disclose your personal information with your consent.

## Additional Disclosures Under Applicable Law

You may have certain rights regarding our processing of your personal information under applicable local law. If our processing of your personal information is governed by such laws, this section provides you with additional information regarding your rights and our processing of your personal information under applicable local law.

Below is a chart that describes the categories of third parties to whom we may disclose the categories of personal information described above for our business purposes.

Category of personal information	Categories of third parties to whom we may disclose personal information for a business purpose
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• OAI affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Government authorities</li> </ul>
<b>Internet or other electronic network activity</b>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Government authorities</li> </ul>

We do not “sell” or “share” for cross-context behavioral advertising (as those terms are defined under applicable local law) your personal information. We do not disclose your sensitive personal information for purposes other than permitted under applicable local law.

### ***Data Retention***

Your personal information will be held for only so long as it is necessary for the purpose for which it was originally collected, and in accordance with applicable local law. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy. When assessing retention periods, we first examine whether it is necessary to retain the personal information collected and, if retention is required, work to retain the personal information for the shortest possible period permissible under applicable law.

### ***Your Privacy Choices and Rights***

Depending on the jurisdiction in which you live, you may have the following rights under applicable local law:

- Right to request access and a copy of your personal information and information relating to how it is processed;
- Right to request deletion of your personal information;
- Right to request the correction or update of the personal information we hold about you;
- Right to opt-out of “sales” of your personal information and “sharing” of your personal information for cross-context behavioral advertising purposes (as these terms are defined under applicable law)
- Right to opt-out of targeted advertising;
- Right to limit our use of your sensitive personal information;
- Right to opt-out of certain profiling activities;
- Right to not be unlawfully discriminated against for exercising your rights.

These rights may be limited or denied in some circumstances. For example, we may retain your personal information where required or permitted under applicable law.

### ***Submitting Requests***

To exercise your rights under applicable local law or if you are an authorized agent submitting a request on behalf of an individual under applicable local law, you may contact us at 1-888-964-0320 or submit a request through our [Webform](#). You or your authorized agent may be asked to provide

information such as your name, email address, or mailing address. Authorized agents must also provide a copy of the consumer's signed permission authorizing the agent to submit requests on the consumer's behalf.

### **Appeals**

You may have a right to appeal a decision we make relating to requests to exercise your rights under applicable local law. To appeal a decision, please contact us at [otsuka@otsuka-america.com](mailto:otsuka@otsuka-america.com).

### **Security of My Information**

We implement physical, technical, and organizational security measures designed to safeguard personal information. These measures are aimed to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

### **Third Party Links**

Our Site may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but is instead governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites, and we encourage you to review the privacy policies of any third-party sites you choose to visit.

### **Children**

Our Site is not intended for children under the age of 13. We do not knowingly collect personal information from children under the age of 13. If we discover that a child under 13 has provided us with personal information, we will take reasonable steps to promptly delete such information from our systems. We do not knowingly "sell" or "share" the personal information of children under the age of 16.

### **Contact Us**

If you have any questions, comments, concerns, or complaints regarding your personal information or our privacy practices, please contact us by telephone at 1-888-964-0320 or submit a request to us through our [Contact page](#).

### **Changes to this Policy**

This Policy is current as of the Last Updated date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. If we make any changes to this Policy that materially affect our practices with regard to the information we have previously collected about you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site or sending you an email.