

# PHARMACOSMOS

| Policy   |  |   |  |
|--|--|---|--|
| <b>Title:</b><br>Privacy Policy -Pharmacosmos Canada Inc.    |  | <b>Effective date:</b><br>July 2, 2026                |  |
| <b>Author</b><br>Kendra BAILLIE      July 2, 2026<br>(KMB)   |  | <b>Reviewer</b><br>Daniel FELIX (DFE)    July 2, 2026 |  |
| <b>Approver</b><br>Michal SOERENSEN    July 2, 2026<br>(MJU) |  |   |  |

## 1. Purpose

As part of our interactions with healthcare professionals and customers, Pharmacosmos Canada Inc. (“Pharmacosmos Canada”, “we”, “our”) collects and processes personal information. This Privacy Policy explains what personal information we collect, how we may use or disclose it, and the rights available to you under applicable Canadian privacy laws.

We comply with applicable Canadian privacy laws, including:

- The Personal Information Protection and Electronic Documents Act;
- Alberta’s Personal Information Protection Act;
- British Columbia’s Personal Information Protection Act; and
- Québec’s Act respecting the protection of personal information in the private sector.

Pharmacosmos Canada acts as the data controller for the personal information described in this notice.

## 2. Personal Information We Collect and Purpose of Processing

| Categories of Personal Information   | Purpose of Processing  |
|--|--|
| <ul style="list-style-type: none"><li>• Contact information (name, email, phone, professional address)</li></ul>   | To communicate with you regarding Pharmacosmos products, services, events, and medical information |
| <ul style="list-style-type: none"><li>• Professional details (role, specialty, institution)</li></ul>  | To understand your professional profile and ensure relevant communications                         |
| <ul style="list-style-type: none"><li>• Information about your interactions with our digital materials (e.g., email engagement, website usage, content viewed)</li></ul> | To improve the relevance and quality of our communications and services                            |

# PHARMACOSMOS

| Categories of Personal Information   | Purpose of Processing  |
|--|--|
| <ul style="list-style-type: none"> <li>Information from publicly available professional sources (e.g., publications, institutional websites, LinkedIn)</li> </ul>                                      | To maintain accurate professional records and understand your areas of expertise   |
| <ul style="list-style-type: none"> <li>Preferences you share with us (e.g., communication preferences, areas of interest)</li> </ul>   | To tailor communications and ensure you receive information aligned with your preferences  |
| <ul style="list-style-type: none"> <li>Internet or other electronic activity information (e.g., session information, browsing behavior, download errors, length of visits to certain pages)</li> </ul> | To operate, maintain and improve our website, digital platforms and communications   |
| <ul style="list-style-type: none"> <li>Technical information (e.g., IP address, browser type/version, device identifiers, operating system)</li> </ul>   | To ensure security, troubleshoot issues, and support system administration   |
| <ul style="list-style-type: none"> <li>Contractual relationship information (where applicable)</li> </ul>  | To establish, manage and terminate contractual/partnership relationships   |
| <ul style="list-style-type: none"> <li>Any other personal information, as permitted or required by applicable laws and with appropriate legal basis</li> </ul>   | Other categories of personal information as permitted by, and to comply with, any legal or regulatory requirements or provisions, and for any other purpose to which you consent |

We do **not** collect personal health information for marketing or promotional purposes.

### 3. Consent

By submitting personal information to Pharmacosmos Canada or its service providers and agents, you agree that we may collect, use and disclose such personal information in accordance with this Privacy Policy and as permitted or required by law.

Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the purposes identified in this Privacy Policy at any time by contacting Pharmacosmos Canada's Privacy Officer. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you. If you provide Pharmacosmos Canada or our service providers

# PHARMACOSMOS

and agents with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

Our services and websites are not targeted or directed at children under the age of 14. No one under age 14 may use the services or provide any personal information to our websites. We do not knowingly collect personal information from children under the age of 14. If you believe we might have any information from or about a child under 14, please contact us using the contact details as provided in the “Contact Us” section below.

## 4. Automated Processing and Profiling

We may use digital tools to analyze how you engage with our communications (e.g., email opens, link clicks, website navigation). This helps us understand your preferences and improve the relevance of our materials.

We do **not** make decisions based solely on automated processing of your personal information.

## 5. How We Obtain Personal Information

We collect personal information from:

- You directly (e.g., meetings, events, email exchanges, digital forms)
- Publicly available professional sources (e.g., publications, institutional websites, LinkedIn)
- Your interactions with our digital platforms. We may automatically collect certain information about your equipment and browsing actions and patterns using cookies, pixels, server logs and other similar technologies. Please see our [Cookie Policy](#) for more information regarding our use of digital trackers.
- Service providers who support our CRM or digital communication systems

We do **not** purchase personal information from third-party data brokers.

## 6. Sharing Your Personal Information

| Personal Information Shared                             | Recipients                                    | Purpose of Sharing  |
|---|---|---|
| Information related to customer relationship management | Pharmacosmos affiliates (only when necessary) | To coordinate communications, events, or services involving another affiliate |

# PHARMACOSMOS

| Personal Information Shared     | Recipients                             | Purpose of Sharing  |
|---------------------------------|--|---|
| CRM and digital engagement data | Service providers acting on our behalf | To support CRM systems, digital communications, analytics, and technical operations |
| Any personal information        | Legal or regulatory authorities        | To comply with applicable laws, regulations, or requests from authorities           |
| Any personal information        | Any third party                        | As determined and subject to your consent, where required under applicable law      |

We do **not** sell or rent personal information.

## 7. Transfers Outside Canada

By providing us with personal information, you acknowledge and agree that such personal information may be transferred to other jurisdictions for processing and storage, including in servers located across Canada and Denmark, where laws regarding the protection of personal information may be less stringent than the laws in your jurisdiction. Further, such personal information may be accessible to law enforcement, national security authorities, and the courts of such jurisdictions. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information.

## 8. Retention of Personal Information

We retain personal information only for:

- as long as necessary to fulfill the purposes described in this notice, or
- as long as required by applicable laws and regulations

Retention periods may vary depending on the nature of the information and regulatory requirements.

## 9. Your Privacy Rights

Subject to certain exemptions, to the extent permitted by applicable law, you have the following rights in relation to the personal information we hold about you:

- Your right of access. At your written request we will inform you whether we hold personal information relating to you and if we do, you have the right to receive a general account of our processing of such personal information. If your request is

# PHARMACOSMOS

made in writing, subject to applicable laws and the provisions of this Privacy Policy, we will also provide you with access to your personal information that is in our possession. A reasonable fee may be levied if you request the transcription, reproduction or transmission of such information and you will have to provide information or documentation to verify your identity. We will inform you of the approximate cost before proceeding to respond to your request. Your rights to access your personal information are not absolute. Access can be denied for several different reasons under applicable legislation. If we deny your request for access to your personal information, we shall explain why.

- Your right to correction. If we hold personal information about you and you believe that it is not accurate, complete or up to date, you can request to have it corrected. If we discover that information is not accurate, complete or up to date, we will take reasonable steps to correct it.
- Your right to withdraw consent. If we rely on your implicit or explicit consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Other rights. You may also have the following rights in certain limited circumstances:
  - Restriction: request limits on how your information is used
  - Deletion: request deletion of personal information
  - Portability: request a copy of your information in a structured format

## 10. Contact Information

If you have questions about this Privacy Notification or wish to exercise your privacy rights, please contact:

### **Privacy Officer**

Pharmacosmos Canada Inc.  
6925 Century Ave, Suite 802  
Mississauga, ON L5N 7K2

Email: infoCA@pharmacosmos.com  
Phone: 905-361-9811  
Toll free: 1-800-361-1555

# PHARMACOSMOS

Pharmacosmos Canada will respond to privacy inquiries and rights requests in accordance with applicable Canadian privacy laws.

## 11. Changes to the Privacy Policy

Pharmacosmos Canada reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our website and make such revised policy and changes available upon request to Pharmacosmos Canada's Privacy Officer. However, Pharmacosmos Canada will obtain the necessary consents required under applicable privacy laws if it seeks to collect, use or disclose your personal information for purposes other than those to which consent has been obtained unless otherwise required or permitted by law.

## 12. List of Changes & Review Dates

| Version | Change         | Reason     | Date         |
|---------|----------------|------------|--------------|
| 001     | Policy Created | New Policy | July 2, 2026 |