



Employee Privacy Notice

I. Introduction

This Privacy Notice (the "Notice") describes the policies and practices of Ironshore Pharmaceuticals Inc. ("**Ironshore**" or "**we**" or "**us**") with respect to the collection, use and sharing of the personally identifiable information ("PII") we collect regarding you and other employees of Ironshore. If you use our website or otherwise provide us with your PII in a non-employment-related context, we will treat that PII in accordance with the Privacy Policy posted on our website, <https://www.ironshorepharma.com/privacy.html>; otherwise, our policies for handling PII about you will be as stated in this Notice.

For purposes of this Notice, PII about you means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household.

We may add to, delete, or change the terms of the Notice from time to time. If we make a material change affecting your privacy rights, we will send you the amended Notice by mail or email.

II. How Does Ironshore Collect Your PII and What Types of PII Does It Collect?

Ironshore collects PII about you when you actively provide it to us, such as when you submit a job application to us, fill out benefits forms, sign up for events, etc.

We also may collect PII about you from the following sources: the Internet, including social media websites and other websites; the press or other print media; credit reporting agencies; and other persons and organizations as permitted under applicable law or as authorized by you.

Not all information that we collect from you is PII. We may collect information about you that we cannot use to identify you specifically. Listed below are the types of information about you that we may have collected within the past 12 months. These types of information are PII only if the information identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device.

- **Identifiers** such as: your name, postal address, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
- **Professional or employment-related information**, such as your past job history.

- **Education information**, such as school transcripts.
- **Personal characteristics** that are related to classifications legally protected from discrimination, such as race, national origin, ethnicity, marital status, age and gender.
- **Internet or other similar network activity**, such as browsing history, search history, information on your interaction with our websites. This may include hardware and browser information of your computer or device.
- **Geolocation data**, meaning the physical location or movements of the device you use to connect with us online. If you use a mobile device to access Ironshore’s internal network or servers, we may collect the physical location of your device through the use of, for example, Bluetooth, satellite, cell phone tower, Wi-Fi signals, or other technologies.
- **Sensory data**, such as audio, electronic, visual, or similar information.
- **“Customer Records” information** (some of which may be identifiers or professional/employment-related information as well), such as your name, signature, Social Security number, physical characteristics or description, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- **Purchasing history**, including records relating to personal property or consuming tendencies, such a receipt you might submit for business-related expenses you incurred.
- **Biometric information**, such as fingerprints or voiceprints.
- **Inferences drawn from other PII**, such as a summary we might make based on your apparent personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

III. **Our Business Purposes for Collecting Your PII; How We Use the Information**

We may use the PII we collect from you for a variety of purposes permitted by law, including:

- To communicate with you, including in response to your inquiries or requests, and to inform you of changes to terms and conditions involving your employment, benefits, etc.;
- To allow you to apply for new positions within Ironshore;

- To evaluate job performance and to conduct trainings;
- For tax filing and payroll purposes;
- To provide you with benefits related to your employment, such as medical, dental and vision;
- To protect the security of Ironshore systems and data, such as by confirming your identity for network access or physical security purposes;
- For emergency preparedness and response, such as to identify your location, medical conditions, etc. to aid you or others in an emergency;
- For legal, compliance and risk management purposes, including to monitor our compliance with fair employment laws and regulations; and
- Other legally permissible or everyday business purposes, including data analysis, compliance with law enforcement, and other legal processes.

IV. When and With Whom We Share Your PII

We may share your PII with our service providers that handle our payroll, benefits, recruitment, and other employment-related services. We bind our service providers to protect the confidentiality and security of the confidential information, including PII, that we share with them.

We also share PII with others as we believe to be necessary or appropriate, consistent with applicable law, including for the following purposes: (a) to comply with applicable legal requirements (for example, responding to subpoenas); (b) to respond to requests from public and government authorities; (c) to protect our rights or property or the privacy, safety or property of you or others; (d) to allow us to pursue available remedies or limit the damages that we may sustain; and (e) to evaluate or conduct a merger, divestiture, restructuring, reorganization, assignment, transfer, or other disposition of all or any portion of our business or assets.

V. Questions You May Have

If you have any questions regarding this Policy, please contact **Jim Fletcher, VP, Human Resources** at jim.fletcher@ironshorepharma.com.