

## **Anovo Privacy Notice**

### **Version 1.0. Last Updated: 3-15-2025**

This Privacy Notice is provided by AnovoRx Group, LLC and its affiliates which are controlling, controlled by, or under common control with AnovoRx Group, LLC (collectively “**Anovo**”, “**we**”, “**us**” or “**our**”) to all visitors (“**you**” or “**your**”) who use the Anovo ‘My Anovo App (the “**App**”) or the Anovo website at [https:// www.anovorx.com](https://www.anovorx.com) (the “**Anovo Website**”) or the ‘My Anovo Function’ outside of the APP (“**My Anovo**”). Collectively, the App, the Anovo Website and My Anovo may be referred to as “**Our Sites**”. The App, the Anovo Website and My Anovo may all be accessed via the World Wide Web, and the App may also be accessed via a mobile application. Our Sites are provided to you as a service to share and communicate information about Anovo. The App and My Anovo are provided to not only communicate information about the Anovo pharmacy but to enable certain online, text message, and electronic interactions with Anovo.

For purposes of this notice, we define the following terms:

“**Personal Information**” means any information that may identify a person including but not limited to your name, date of birth, physical address, phone numbers, credit card information, email address, IP address, and/or Social Security and other government issues ID numbers.

“**Health Information**” means any information, in any form and manner, related to the past, present, or future health or medical status, condition, or treatment of a person, including but not limited to a disease state or medical condition, name of medication, prescriber name, and/or prescription information and treatment history.

In addition to this Privacy Notice, Anovo has published its “**Notice of Privacy Practices**” which explains how we may use and disclose Health Information. If any terms in this notice conflict with any terms in the Notice of Privacy Practices, the conflicting terms in the Notice of Privacy Practices will control and override the corresponding terms in this notice.

### **YOUR ACCEPTANCE of THIS PRIVACY NOTICE**

When you access or use Our Sites or SAP, you are deemed to have agreed to the terms and conditions contained in this Privacy Policy. You are deemed to have read and accepted this Privacy Notice each time you access Our Sites or SAP. If you do not agree to the terms of this Privacy Notice, please do not use Our Sites. The terms and conditions contained in this Privacy Notice are subject to and may be superseded by applicable Federal and State laws.

### **SECURITY STATEMENT**

We caution and remind you that no method of transmission over the Internet, through an App or via text messaging or storage of data on an Internet server or cell phone or other mobile device is 100% secure. We use commercially acceptable and reasonable technical and procedural precautions as to Our Sites to protect your information, however we do not guarantee its absolute security. We cannot protect information that is present on cell phones, or on laptops, computers, or other personal devices that you use or access. Statements here and elsewhere on Our Sites concerning the use and disclosure of your Personal Information may not apply as to information in our possession prior to the last update date of this Privacy Notice.

## **NO USE BY CHILDREN**

Our Sites are not intended for use by persons under age 18, and not designed to attract users under age 18. If you are under the age of 18, or are otherwise deemed a minor, do not use Our Sites. A parent, authorized caregiver, guardian, or other legally authorized person may use Our Sites or register for access to the My Anovo App and My Anovo and use them on behalf of a minor. Personal Information and Health Information of a child under age 13 must be provided by a parent, adult caregiver or legal guardian, and not by a child under the age of 13 who is using Our Sites. If you are the parent, authorized caregiver or legal guardian of a child under the age of 13 whom you have reason to believe has provided his or her own Personal Information or Health Information to us, you have the right to request the removal of that child's Personal Information and/or Health Information from Our Sites. In order to request such removal, please send an e-mail to [officialcontact@anovorx.com](mailto:officialcontact@anovorx.com). You will be required to validate your relationship as the child's parent, authorized caregiver or legal guardian in order to have their Personal Information or Health Information removed.

## **MY ANOVO & THE MY ANOVO APP COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION & HEALTH-RELATED PERSONAL INFORMATION**

### **-Background**

Use of the My Anovo App and My Anovo is optional. Anovo Patients (and their authorized caregivers) may utilize the My Anovo App and My Anovo. To use the App or My Anovo, patients are required to provide Personal Information and Health Information as necessary to effectively use the services offered through the My Anovo App or My Anovo. The information you disclose to us during registration and in connection with use is deemed to be provided on a voluntary basis. Note that we may collect Personal Information during the registration process. Use of the App or My Anovo will allow you to (i) electronically complete and submit to Anovo certain documents that contain Personal Information and/or Health Information and (ii) text with Anovo through the APP or My Anovo. Use of texting for communication with Anovo requires your consent.

### **-Welcome Packet and Patient Profile**

The Patient Profile is part of the Anovo Welcome Packet. The Welcome Packet is available via the App, My Anovo, or in your first delivered prescription order. The information in the Patient Profile is used by Anovo to provide pharmacy services for you and to bill your payer. The Patient Profile requires you to provide Personal Information and Health Information we need to provide these services for you. Use of the App or My Anovo will allow you to submit the Patient Profile electronically. If you elect to not submit the Patient Profile electronically, it may be mailed to Anovo.

### **-Reminders**

When using the My Anovo or the App, patients may receive refill reminders via text messages. You may not receive your reminders if your mobile device is switched off, your mobile device or the App is malfunctioning, or otherwise. You may stop receiving future text refill reminders by entering the STOP feature in the App or My Anovo.

### **-Therapy and Billing Communications**

If you use My Anovo or the App, you and Anovo may communicate about your therapy, refills, benefit eligibility, status of prior authorizations, billing and payment information, medication storage and administration, drug recalls, drug shortages, drug interactions, patient assistance programs, patient support services, scheduling of deliveries, delivery

delays, and other information related to the pharmacy services we provide. These communications may contain Personal Information or Health Information.

#### **-Delivery Confirmation and Notices**

If you use the My Anovo or the App, you and Anovo may communicate about confirming receipt of your delivery, delivery status, delivery delays and rescheduling of deliveries. These communications may contain Personal Information or Health Information.

#### **-Text Messaging**

If you use the App or My Anovo, and consent to text messaging, you and Anovo may communicate about your therapy, refills, benefit eligibility, status of prior authorizations, billing and payment information, medication storage and administration, drug recalls, drug shortages, drug interactions, patient assistance programs, patient support services, scheduling of deliveries, delivery delays, and other information related to the pharmacy services we provide. These communications may contain Personal Information or Health Information.

#### **-Patient Surveys**

From time to time, Anovo may itself, or through a third party, survey its patients about its services and customer relationships. The survey may be available via or submitted via the Anovo Website, the App, or My Anovo. If you choose to participate in a survey, that information may be shared with us or with others subject to the terms of this privacy notice. Comments and other Non-Personal Information that you provide through a survey response may be identifiable to us as your Personal Information. Any Personal Information or Health Information you provide in a survey response may be shared with us or with others subject to the terms of this privacy notice.

#### **-Guest Authentication and Functionality**

Certain functionality on the App or My Anovo requires you to login. Other functionality may be available without the use of login credentials. However, depending on the nature of the non-login functionality (“guest functionality”), you may be required to authenticate yourself (“guest authentication”). For example, App features such as requesting a refill, checking order status, and paying a bill may be performed by logging into the App or by use of guest functionality. If you have not previously registered for access to the App, we will not use Personal Information captured during guest authentication to register you for the App unless you have requested that we do so.

In general, we will not use the Personal Information collected during guest authentication to update your profile unless otherwise indicated. However, we may utilize the Personal Information captured to provide the associated guest functionality. For example, if you provide an email address while requesting a refill request using guest functionality, that information may be used to confirm that your refill has been shipped. When using guest functionality, we may communicate with you using your communication preferences and/or Personal Information contained in your profile or otherwise available to us.

### **ANOVO WEBSITE COLLECTION, COLLECTION, USE, & DISCLOSURE OF PERSONAL INFORMATION & HEALTH-RELATED PERSONAL INFORMATION**

#### **-Healthcare Providers Patient Prescription Forms**

The Anovo Website contains forms for use by prescribers to prescribe treatment regimens to be fulfilled by Accredo. Prescribers do not need to register on the Anovo Website to

obtain the prescription forms, and no Personal Information or Health Information is required to download the prescription forms.

#### **- Employment-Related Information**

The Anovo Website contains information about employment with Anovo and Anovo employment practices. The **Employee Center** section of the Anovo website provides access to essential resources such as company newsletters and announcements, benefits information, the employee handbook, policies, forms and employee growth and training opportunities through Anovo U, and also has links to third party resources. The **Employee Center** is integrated into Anovo's Single Sign-On platform for employees. No Health Information is required to access or download any employment related information from the Anovo website. When you access employment related information on Anovo Website, your identity and Personal Information may be available to us.

#### **-Medication Guides**

The Anovo Website may contain information about medications available from the Anovo pharmacy. No Personal Information or Health Information is required to download any medication-guide related information from the Anovo website. The medication information may link to third party sites. See the information provided below as to Linked Sites.

#### **-Manufacturer Information**

The Anovo Website contains information pertinent to pharmaceutical manufacturers. No Personal Information or Health Information is required to view or download this information.

#### **-Customers**

The Anovo Website and SAP software contains information pertinent to customers who purchase medications from or store their medications with Anovo's prescription drug wholesaler or 3PL. No Personal Information or Health Information is required to view or download this information. But, if a customer

### **OTHER COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION AND HEALTH-RELATED PERSONAL INFORMATION**

#### **-Linked Sites**

The Anovo Website and My Anovo App may contain hyperlinks that allow users to connect to other websites. These other websites may be owned by us or be owned by third parties (collectively, "**Linked Sites**"). You may also be able to access the Anovo Website and My Anovo App via a hyperlink embedded in a Linked Site. When you click on a hyperlink and leave Our Sites, this Anovo Privacy Notice will immediately not apply to access, use of or activity on the Linked Site. This Privacy Notice does not apply to any third-party websites and apps that you may use, including those to which we link in Our Sites. You should review the terms and policies for third-party websites and apps before clicking on any links. Comments and other information that you provide through a Linked Site may be provided to us by the Linked Site and may allow us to identify you from your Personal Information.

#### **-Third Parties**

We may use third parties to: (a) operate and maintain the server(s) on which Our Sites operate, (b) store data in the Cloud, (c) provide, maintain and support the Anovo Website, My Anovo and the App; (d) manage login credentials for My Anovo and the App, (e) provide and embed Tracking Mechanism(s) into Our Sites, (f) analyze your communications and interactions with Our Sites, (g) de-identify and/or aggregate data, and (h) collect Non-Personal Information from you. The third party may then share the Personal Information, Non-Personal Information, Aggregate Data, and/or other data with us.

#### **- Analytics**

We may log and analyze your communications with us and your interactions with Our Sites. We may also use third parties to log and analyze your communications with us and your interactions with Our Sites. Third parties performing these services for us will be required to protect your Personal Information and Health Information in a manner consistent with this Privacy Notice.

#### **-Social Media**

If you comment about us on social media or communicate with us through social media, we may use social media to communicate with you. We may also post content of interest about us or our services on social media. You may or configure your social media account settings to limit or block our viewing of your social media communications or your viewing of our posts. When you comment about us on social media or communicate to us via social media, your identity and Personal Information may be available to us.

#### **- Compelled and Necessary Disclosures**

We may disclose your personal information to comply with our legal obligations, regulations, or contracts, or to respond to a court order, administrative, or judicial process, such as a subpoena, government audit, or search warrant where we are legally compelled to do so. We also may disclose your information to our licensing authorities, auditors, lawyers, accountants and accreditation bodies as we believe necessary or required, and also when there are threats to the physical safety of any person, violations of our policies or other agreements, or to protect the legal rights of third parties, including our employees, users, or the public. We may also disclose your Personal Information and Health Information as reasonably necessary to protect our rights or property, or to enforce this Privacy Notice and the Terms of Use of Our Sites, and/or to protect our legal rights, or establish, exercise, or defend our rights in legal claims.

**-Corporate Transactions.** We own all Personal Information, Health Information, and Non-Personal Information obtained through Our Sites. Your Personal Information, Health Information, and Non-Personal Information obtained through Our Sites may be disclosed or transferred to relevant third parties in the event of, or as part of the due diligence for, any proposed or actual reorganization, sale, merger, consolidation, joint venture, assignment, transfer, or other disposition of all or part of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).

#### **-Aggregated Data**

We may aggregate the personal information we collect, or insights generated or derived from the use of Our Sites, or remove pieces of personal information (“de-identify”) to limit or prevent identification of any particular user or device to help with

goals like marketing, research and product development (including training our artificial intelligence models that power certain of our services). Where such information has been aggregated and anonymized so that it is no longer considered personal information under applicable data protection law, this Notice does not apply.

**-Performance of Services for You.**

If you are a client of our pharmacy, we will dispense and deliver to you prescriptions filled by our pharmacy. This may involve sharing Personal Information and/or Health Information and communicating with you and/or your prescriber, a patient assistance or support program, a payer, a manufacturer HUB or REMS Program with which you enrolled, and/ or a pharmacovigilance company. We may also use and disclose Personal Information and/or Health Information in connection with providing you with delivery of medication storage and administration guidance, information on drug recalls, drug shortages, drug interactions, or as otherwise described in our Notice of Privacy Practices. Your name, address and phone number may be disclosed to a national carrier or delivery service in order to consummate delivery of your prescribed medication or supplies. We may use your Personal Information to send you information related to your medication or our services that may be of interest to you. And, we may disclose or provide your Personal Information and Health Information to our business associates who use or store information or provide our services on our behalf. Those business associates will be required to protect your Personal Information and Health Information in a manner consistent with this Privacy Notice and our Notice of Privacy Practices. We may disclose or provide your Personal Information and Health Information to prevent, investigate, and respond to fraud, unauthorized access to or use of our Services, breaches of terms and policies, or other wrongful behavior.

**-Consent.** We may disclose your Personal Information and/or Health Information in other ways if you have asked us to do so or have given consent. For example, with your consent, we post user testimonials or videos that may identify you.

**Payment Related Information**

When you make a payment, we disclose your payment method details, including your to the third-party payment processor and/or payer selected by you, including your relevant Personal Information and/or Health Information. If you seek participation or participate in a patient assistance program or similar, we disclose your relevant Personal Information and/or Health Information. We may also use and disclose your Personal Information and/or Health Information, to determine benefit eligibility, status of prior authorizations, billing and payment information, availability of patient assistance programs, patient support services, scheduling of deliveries, delivery delays, and other information related to the pharmacy services we provide

**Cookies and Other Technologies**

We may use cookies, tags, and other tracking mechanisms to track information about your use of our services, and to provide, customize, evaluate, and improve our services, and collect information about your activities on and/or usage of Our Sites. Activity information we collect may include which web pages you visited, the Uniform Resource Locator (“URL”) identifying the website you came from or visit after you

leave Our Sites, the average time you spent on Our Sites, information—including Personal Information—you've previously shared with us, your domain, your computer's Internet Protocol("IP") address, etc. In addition, if you are logged into a password protected area, we may associate that information with your account. Cookies are transferred to your device's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate Our Sites, while others are used to allow us to track your activities on Our Services. Other Cookies are for the functionality of Our Sites.

To accomplish this, we may use the following:

- Web Beacons – Web Beacons are strings of code placed on a web page in conjunction with Cookies (defined below). Web Beacons are able to track the number of times you visit a website and, in conjunction with cookies, identify the IP address.
- IP Address and Device Information – The IP address is the numerical label associated with the location of your computing device. We also may collect device ID, device type and browser operating system type.
- Cookies and other Network Activity Information, including Location Information –
- A cookie is a small amount of data, which often includes a unique identifier that is placed on your computer or on your mobile phone/tablet (collectively referred to herein as a "device") browser from a website's computer and is stored on your device's hard drive. There are two different types of cookies: session cookies and persistent cookies. Session cookies are held temporarily and disappear when you close your browser. Persistent cookies may be used by your browser on subsequent visits. Cookies are widely used to provide certain features of a website, to make websites perform more efficiently, and to provide information to Anovo about users of the website.
- In some cases, Our Sites may use HTTP cookies (web cookies, Internet cookies, browser cookies), Flash Cookies (cookies that are not related to a specific browser, further described below), clear GIFs (a.k.a. Web Beacons), and log file information (a file that records either events that occur in an operating system or other software runs, or messages between different users of a communication software) to: (a) store information so that you will not have to reenter it during your visit or the next time you visit the event; (b) provide customer, personalized content and information; or (c) monitor aggregate metrics such as total number of visitors, pages, viewed, and similar information.

**- Device Information.** If you do not want us to see your device location, you can turn off location sharing on your device, change your device privacy settings, or decline to share location on your browser.

#### **RETENTION OF INFORMATION**

We retain Personal Information and Health Information as required by our applicable policies, contracts, and/or regulatory requirements.

## **OUR SITES THE TERMS OF USE**

Our Sites may each have Terms of Use. This Privacy Notice is governed by and subject to those respective Terms of Use.

## **COMPLAINTS**

We are committed to resolving valid complaints about your privacy and our collection, use, storage, or other processing of your Personal Information and Health Information. For questions or complaints regarding our data use practices or this Notice, please contact us via [officialcontact@anovorx.com](mailto:officialcontact@anovorx.com).

## **STATE-SPECIFIC DISCLOSURES**

Residents of certain states have additional rights under applicable privacy laws if certain conditions apply to a company.

**As of the date of the most recent update of this Privacy Notice, the conditions and thresholds of these state privacy laws do not apply to Anovo. Should these circumstances change, Anovo will revise this Privacy Notice.**

Anovo has however provided a brief description of the rights you would have IF circumstances change. Section #1 below describes the rights created by the state privacy laws that are currently effective or will take effect in 2025. Section 2 below describes the rights residents of California would have.

### **1. Rights for Residents of Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Tennessee, Utah, and Virginia**

The list below describes the rights available to the extent (i) you are a resident of the specific state, (ii) the law is in effect, (iii) the volume threshold and other conditions of the law apply to Anovo, and we (iv) collect Personal Information subject to the law under the Colorado Privacy Act; Connecticut Data Protection Act; Delaware Personal Data Privacy Act; Iowa Consumer Data Protection Act; Maryland Online Data Privacy Act (effective October 2025); Minnesota Consumer Data Privacy Act (effective July 2025); Montana Consumer Data Privacy Act; Nebraska Data Privacy Act; New Hampshire Privacy Act; New Jersey Data Protection Act; Oregon Consumer Privacy Act; Texas Data Privacy and Security Act; Tennessee Information Privacy Act (effective July 2025); the Utah Consumer Privacy Act; and the Virginia Consumer Data Protection Act.

- **Right to Access:** You have the right to confirm whether or not we are processing your Personal Information and to access such Personal Information.
- **Right to Correction:** You have the right to correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information and the purposes of the processing of your Personal Information.
- **Right to Deletion:** You have the right to delete the Personal Information provided to us by you.



- **Right to Data Portability:** You have the right to obtain a copy of the Personal Information that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit your Personal Information to another controller without hindrance, where the processing is carried out by automated means.
- **Right to Opt-Out of Sales, Targeted Advertising, and Profiling:** For purposes of the applicable state laws, a “sale” includes disclosing Personal Information to a third party in exchange for monetary compensation or other valuable consideration. We do not “sell” Personal Information under this definition. Some states provide a right to opt out of the automated processing of your Personal Information by us for decisions that produce legal or similar significant effects concerning you, but we do not process Personal Information for such profiling. To opt out of targeted advertising, please click on the Opt-Out Link on the bottom of the website homepage.
- **Right to Appeal:** If we decline to act regarding your request, you have the right to appeal. We will notify you providing our reasons and instructions for how you can appeal the decision. Note that Utah law does not provide a right to appeal.

## **2. California Privacy Rights**

Under the California Privacy Act (CCPA), California residents have the right to receive certain disclosures regarding our information practices related to “Personal Information”, as defined under the CCPA. To the extent you are a resident of California, and we (i) collect Personal Information subject to CCPA, AND (ii) have the volume of users of Our Sites and meet the other conditions of the CCPA, the following would apply:

### **Disclosures to Third Parties**

This section relates to our third-party disclosures. We may disclose Personal Information to service providers, as described above in this Notice. We also may disclose the Personal Information we collect (as described above) to the following categories of third parties.

- Third party analytics providers
- Regulators, government entities, and law enforcement
- Affiliates and subsidiaries

Additionally, CCPA defines a "sale" as disclosing or making available to a third-party Personal Information in exchange for monetary or other valuable consideration, and “sharing” broadly includes disclosing or making available Personal Information to a third party for purposes of cross-context behavioral advertising. While we do not disclose Personal Information to third parties in exchange for monetary compensation, we may “sell” or “share” (as defined by the CCPA) identifiers and internet and electronic network activity information to third parties. We do so in order to improve and evaluate our advertising campaigns and better reach customers and prospective customers with more relevant ads and content. As described in the Cookies and Other Technologies section above, although we may also use session

replay technologies to record users' interactions with the Services, this data is not accessible by or shared with third parties or service providers.

We do not sell or share any Personal Information about individuals who we know are under sixteen (16) years old.

### **Your CCPA Rights**

To the extent you are a resident of California, you may have the following rights to your Personal Information:

- **Right to Access:** With respect to the Personal Information we have collected about you in the prior 12 months, you have the right to request from us (up to twice per year and subject to certain exemptions): (i) categories of Personal Information about you we have collected; (ii) the sources from which we have collected that Personal Information; (iii) our business or commercial purposes for collecting, selling, or disclosing that Personal Information; (iv) the categories of third parties to whom we have disclosed that Personal Information; and (v) a copy of the specific pieces of your Personal Information we have collected.
- **Right to Correct:** You have the right to request that we correct inaccuracies in your Personal Information.
- **Right to Delete:** Subject to certain conditions and exceptions, you may have the right to request deletion of Personal Information that we have collected about you.
- **Right to Opt-Out of Sale/Sharing:** You may have the right to opt-out of the "sale" or "sharing" of your Personal Information.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of the rights described in this section.
- **Authorized Agent:** You may designate someone as an authorized agent to submit requests and act on your behalf. To do so, you must provide us with written permission to allow the authorized agent to act on your behalf.

### **CHANGES IN OUR PRIVACY NOTICE**

We may change or update this Privacy Notice from time to time. When we do, we will post the revised Privacy Notice on Our Sites. The updated Privacy Notice will be given a new version number and a new "Last Updated" date. We are not required to otherwise notify you that the Privacy Notice was updated.