

## INOTIV PRIVACY POLICY

**Last updated:** October 6, 2023

Inotiv, Inc. and its group of companies (collectively, “Inotiv,” “we,” “us,” and “our,”) respect your privacy and are committed to safeguarding and respecting the privacy of your personal information. This Privacy Policy describes our practices when you use our websites or otherwise interact with us online or offline (together, our “Services”).

### PERSONAL INFORMATION WE COLLECT

When you access or use our Services, we may collect the following categories of information:

- **Identifiers and Contact Information, such as:**
  - First name, last name, title, username or similar identifier, e-mail address, phone number
- **Technical Data, such as:**
  - Internet protocol address (IP), your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, other technology on the devices you use to access this website
- **Usage Data, such as:**
  - Information about how you use our websites, such as pages viewed, how much time you spent on a page, date, and length of visits
- **Profile Data, such as:**
  - Your areas of research, areas of interest, preferences, feedback and survey responses, role in purchasing

### SOURCES OF PERSONAL INFORMATION

We collect information from and about you from the following sources:

- Directly from you, when you provide information to us or interact with us, such as when you purchase our products or services, subscribe to our services or publications, request access to or be sent marketing content, participate in surveys, register for an event, or provide us feedback.
- Automatically from you when you use or interact with our Services, such as when you interact with our websites. For example, as you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this information by using cookies, server logs and other similar technologies.
- From other third-party sources that provide consumer data, such as information about your interests, demographic information, and marketing inferences; and
- From online advertising companies who may share information about the marketing and advertisements you have seen or clicked on, and from other sources of publicly available data.

## HOW WE USE YOUR PERSONAL INFORMATION

We use the information we collect from you for the following purposes:

- Provide our Services to you, including to manage any purchases or transactions, facilitate fulfillment, register you as a new customer, manage our relationship with you, and provide important notices;
- For customers, to assess your credit application and evaluate credit worthiness;
- Respond to your requests, questions and comments and provide customer support;
- Monitor the performance of our Services, including metrics such as total number of visitors, traffic, and demographic patterns, and conduct analytics;
- Interact with you, including to notify you regarding products, services, and promotions that may be of interest to you;
- Tailor the content we display to you in our Services and communications, including advertising, and offer products and services that we believe may be of interest to you;
- Manage, operate, and improve the Services and grow our business, including understanding our customer base and the effectiveness of our marketing, events, promotional campaigns, and publications, and diagnose or fix technology problems;
- For legal, security and safety reasons, such as to protect our rights and the rights of our customers, protect the security of our systems and networks, enforce our policies, communicate safety notices, or address legal and regulatory compliance obligations.

In processing your personal information, we rely on one or more of the following legal bases:

*Performance of a Contract:* Where use of your information is necessary to provide you with the Services under a contract or to take steps, at your request, before entering a contract.

*Legitimate Interest:* Where use of your information is necessary for our legitimate interests and where the use is not outweighed by your rights and interests. Our legitimate interests include, but are not limited to, providing the Services, improving the Services, recognizing and better understanding users of the Services, marketing, and promoting the Services.

*Legal Obligation:* Where use of your information is necessary to comply with laws, regulations, or other legal process.

*Consent:* We may ask you for consent, when required by applicable law, to process your information in a certain way.

## HOW WE DISCLOSE YOUR PERSONAL INFORMATION

*Affiliates.* We may disclose your information to companies that we own or control, that are owned or controlled by us, or that are under common ownership or control.

*Service Providers.* To provide and support the Services, sometimes we use other companies as service providers to transmit, collect, process, or store information for us. We require these service providers to treat the information we share with them as confidential and to use it only for providing their services to us. These include:

- Accounting, auditing, and tax providers
- Banking providers
- Insurance providers
- Professional services providers, such as firms that provide consultative services, provide legal services, or supply project-based resources and assistance
- Marketing and advertising entities that assist us in creating and executing marketing, advertising, and sales programs
- Security providers, such as entities that assist with security incident verification and response, service notifications, fraud prevention, identity verification and management, and authentication
- Information technology providers, such as entities that assist with website design, hosting, maintenance, data and software storage, and network operations

*Corporate Event.* If Inotiv, or any portion of our assets, is acquired by, merged with, transferred to, or invested in by another company, we may share your personal information with that company or other third parties involved in the business transition.

*Marketing, advertising and analytics providers.* We disclose information to other companies that conduct marketing and advertising services to promote our Services. This includes directing digital (online) targeted advertising and other marketing offers, promotions, rewards, contests, upcoming events, and notices to you.

*Legal.* We share information where necessary to comply with applicable law, to respond to requests from law enforcement agencies or other government authorities or third parties, as permitted by law, and without your consent when it is necessary to protect our customers, employees, or property, in emergency situations, or to enforce rights under our terms or service and policies.

## HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We keep your data for only as long it is needed to complete the purpose for which it was collected or as required by law. To determine the appropriate retention period for personal information, we use the following criteria:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or is otherwise necessary to investigate theft or other activities potentially in violation of Inotiv's policies and procedures applicable to you or against

the law, to ensure a secure online environment, or to protect health and safety;

- The privacy impact on individuals of ongoing retention; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information such as those listed above may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

## **COOKIES NOTICE**

Our websites use cookies and similar technologies. For more information regarding our use of cookies and how to restrict information collected on our websites, please see our [Cookies Statement](#).

Your browser or device may include "Do Not Track" functionality. Because definitions and rules for a "Do Not Track" standard have not yet been established, including whether such signals must be user-enabled, we do not yet respond to "Do Not Track" signals sent from browsers. However, our website is designed to honor Global Privacy Control signals.

## **SECURITY MEASURES**

Protecting your personal information is important to us. We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

## **CROSS BORDER TRANSFERS**

If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries. The laws in the U.S. regarding personal information may be different from the laws of your state or country. Any such transfers will have appropriate safeguards as required by relevant law.

## **INFORMATION FROM CHILDREN**

Our websites are not directed toward children under 16 years of age, and Inotiv does not knowingly collect any information from children under 16 years of age. If we learn that we have inadvertently gathered Personal Information from a child under the age of 16, we will take reasonable measures to promptly remove that information from our records.

## **YOUR PRIVACY RIGHTS**

Depending on where you reside, you may have the following rights with respect to your personal information under applicable data protection laws in your jurisdiction:

- ❑ Right of Access: The right to request information about and access to the personal information we are processing about you.
- ❑ Right to Correction: The right to correct any inaccuracies in the personal information that we hold about you and, where applicable, to complete any incomplete personal information that we hold.
- ❑ Right to Erasure: The right to request that we erase the personal information that we hold about you.
- ❑ Right to Restriction of Processing: The right to restrict our processing of your personal information under certain circumstances, including our processing of personal information considered sensitive and automated profiling that would produce legal or other similar significant effects.
- ❑ Right to Opt-Out of Sale/Sharing: The right to opt-out of targeted advertising and the sale of personal information.
- ❑ Right to Data Portability: The right to receive personal information concerning you in a structured, common, and machine-readable format or request transmission of the data to a third party.
- ❑ Right to Object: The right to object to the processing of your personal information based on our legitimate interests at any time. We will no longer process the data, unless there are compelling legitimate grounds for our processing that override the interests, rights, and freedoms of the data subject, or the processing serves the purpose of asserting, exercising, or defending legal claims. You may also have the right to object at any time to the use of your data for direct marketing.
- ❑ Right to Withdraw Consent: If we are processing your personal information based on your consent, you have the right to withdraw your consent at any time.
- ❑ Lodge a Complaint: Users that reside in the EEA, Switzerland, or the UK have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available [here](#).

You or your authorized agent may submit a request to exercise your rights through this [Data Rights Request](#) form or via email at [dataprivacymanager@inotivco.com](mailto:dataprivacymanager@inotivco.com). To opt-out of targeted advertising or sale of personal information, please click the “Do Not Sell or Share My Information” link. You will not receive discriminatory treatment for the exercise of your rights. If we deny your request, you may have the right to appeal our decision. You can request further review via email to [dataprivacymanager@inotivco.com](mailto:dataprivacymanager@inotivco.com). Please note that, in order to verify your identity, we may require you to provide us with information prior to accessing any records containing information about you.

We may have a reason under the law why we do not have to comply with your request, or we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

## CHANGES TO THE PRIVACY POLICY

We reserve the right to modify, alter, or update this Privacy Policy from time to time without prior notice. We will post those changes on this page in addition to updating the “Last Updated” at the top of this webpage. Modifications shall become effective immediately upon being posted.

## HOW TO CONTACT US

In the event you have any questions about this Privacy Policy, please contact us by:

- Emailing us at [dataprivacymanager@inotivco.com](mailto:dataprivacymanager@inotivco.com)
- Writing us at:

Attention: Data Privacy Manager  
Inotiv, Inc.  
8520 Allison Pointe Blvd, #400  
Indianapolis, IN 46250

## NOTICE FOR CALIFORNIA RESIDENTS

### California Consumer Privacy Act

California residents have the right to receive notice of the categories of personal information we collect, the purposes for which those categories of personal information will be used, and how we determine the length of time for which the personal information is maintained. You are also entitled to receive notice regarding how we disclose personal information and your rights.

The following chart describes our practices with regard to the collection, use, and retention of your personal information. The categories we use to describe the information are those listed in the California Consumer Privacy Act. Certain personal information may fall into multiple categories, and in some circumstances, how we use and how long we keep the information within each category will vary. The examples of personal information listed below are illustrative. If a category is not listed, we do not collect it.

Category	Required Information
Personal Identifiers	<u>Examples of what we collect:</u> name, email address, phone number, username <u>Sources:</u> Directly from you; third parties <u>Purpose of collection and use:</u> All purposes listed in How We Use Your Personal Information <u>Retention Considerations:</u> Certain identifiers are maintained throughout our relationship with you in order to provide the Services. When you are no longer a customer, we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.
Personal information categories listed in the California Customer	<u>Examples of what we collect:</u> address, telephone number <u>Sources:</u> Directly from you; third parties

Records statute (Cal. Civ. Code § 1798.80(e))	<p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Personal Information</p> <p><u>Retention Considerations:</u> Certain personal information is maintained throughout our relationship with you in order to provide the Services. When you are no longer a customer, we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.</p>
Internet or other similar network activity	<p><u>Examples of what we collect:</u> Unique numerical identifier, cookie or tracking pixel information, device ID, browsing history, search history, IP address, interaction with a website, or interaction with advertisement</p> <p><u>Sources:</u> Automatically from you; third parties</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Personal Information</p> <p><u>Retention Considerations:</u> Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.</p>

Any category of personal information listed in the chart may be disclosed for a business purpose to service providers that we engage to conduct activities on our behalf.

**Sale or Sharing of Personal Information.** We “sell” or “share” (as defined under California law) the following categories of personal information to the following categories of parties:

- Identifiers: to advertising, marketing, and analytics providers
- Internet or Electronic Network Activity Information: to advertising, marketing, and analytics providers

**Right to Opt Out of “Sale” or “Sharing” of Personal Information.** You have a right to opt out from future “sales” or “sharing” of personal information. You can exercise this right by clicking the “[Do Not Sell or Share My Information](#)” link.

**Right to Know, Correct, and Request Deletion.** You have the right to request that we disclose what personal information we collect, use, and sell, as well as the right to request that we delete certain personal information that we have collected from you. If we hold personal information that is not accurate, you have the right to request that we correct this information.

You or your authorized agent may submit a request to exercise your rights by submitting a [Data Rights Request](#) form or by calling 833-448-3273.

For your security and to ensure unauthorized parties do not access your personal information, we will require you to verify your identity before we can act on your request. For requests to correct inaccurate information, we may ask you to provide documentation that demonstrates why or how the existing information is inaccurate.

Before accepting a request from an authorized agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us or confirm that you provided the authorized agent permission to submit the request.

**Right to Restrict Use of Sensitive Personal Information.** California residents have the right to request that a business limit its processing of sensitive personal information under certain circumstances. You can exercise your right by submitting a [Data Rights Request](#) form, by calling 833-448-3273 or by emailing us at [dataprivacymanager@inotivco.com](mailto:dataprivacymanager@inotivco.com).

**Right to Non-Discrimination.** You have a right not to receive discriminatory treatment for the exercise of your privacy rights.

### **Shine the Light Law**

California residents are entitled to request and obtain certain information about the disclosure of certain categories of their Personal Information to third parties for their direct marketing purposes. Requests may be sent to [dataprivacymanager@inotivco.com](mailto:dataprivacymanager@inotivco.com).