

JUUL LABS SCIENCE PRIVACY POLICY

Effective Date: September 16, 2020

JUUL Labs, Inc. (“**Juul Labs**,” “**we**,” or “**us**”) is committed to protecting your privacy. This Privacy Policy explains how personal information you provide to our website, www.juullabsscience.com or in connection with our Investigator-Initiated Research (“**IIR Program**”) is collected, used, stored and disclosed by Juul Labs. This Privacy Policy applies only to our website, www.juullabsscience.com, any other website that links to this Policy, and any other data we collect in relation to the IIR Program, including via the Submission form. JUUL Labs, Inc. is the controller and responsible for your information.

If you wish to contact us in relation to this Privacy Policy, please contact: dataprivacy@juul.com

Your use of the juullabsscience.com website and/or provision of your personal information to us in connection with the IIR Program constitutes your consent to the use, storage, processing and transfer of that information in accordance with this Privacy Policy.

I. INFORMATION WE COLLECT AND HOW WE USE IT

Here are the ways you may provide the information, the types of information you may submit, and how we may use the information.

Personal Information you provide directly to us:

IIR Program-related information. You may choose to provide personal information including: your name, credentials, organization, phone number, email address, written agreement, your research study, your communications with us, and any other information you submit to us when you submit a research proposal, participate as an investigator in the IIR Program, communicate with us about the IIR Program, or participate as a member of an institution engaged in IIR research. We use this information to run and manage the IIR Program, as well as to communicate directly with you.

Contact Us. If you email us through the "Contact Us" link on this site, we ask you for information such as your name and email address so we can respond to your questions and comments. If you use the “Contact Us” feature of this site to provide us with information other than personally identifying information, including suggestions about the site, and any other such information, that information will belong to us and may be used, reproduced, modified, distributed and disclosed by us in any manner we choose, without paying compensation to you. Do not send us any product or advertising ideas.

Non-Personal and Other Information we collect automatically:

You also should be aware that we automatically collect certain statistical information about our site visitors, such as the IP address or unique identifier of your device, the number and

frequency of visitors to certain parts of the site. This data is used only in the aggregate and does not include any personally identifying information. Aggregate and non-personal information does not relate to a single, identifiable visitor. It tells us such things as how many users visited our site and the pages accessed. By collecting this information, we learn how to best tailor this website to our visitors.

II. COOKIES AND DO-NOT-TRACK DISCLOSURE

We do not use cookies on the site, but we may use similar technology to collect aggregate (non-personal) information about Site usage by all of our visitors. We carefully restrict the ability of third parties to collect information about a consumer's online activities over time and across different websites when he or she uses our website. For instance, we use Google Analytics to recognize you and link the devices you use when you visit our site on your browser or mobile device, log in to your account, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the service. Google Analytics allows us to better understand how our users interact with our website. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's site "**How Google uses data when you use our partners' sites or apps**" located at www.google.com/policies/privacy/partners/. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Ad-On at <https://tools.google.com/dlpage/gaoptout/>.

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#).

This site does not currently use technology that recognizes a 'do not track' signal from your web browser.

III. SHARING YOUR INFORMATION

We do not sell, rent or otherwise disclose personal information about our website visitors, except as described here. We may disclose information about you if you request or authorize it or to help complete a transaction for you. We also may share information provided by our website visitors with corporate affiliates or with service providers we have retained to perform services on our behalf. These service providers are restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. In addition, we may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity, to protect your, our, or others' rights, property or safety, or to enforce our agreements.

We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided through this website in a manner that is consistent with this Privacy Statement.

We may disclose de-identified, non-private, or aggregated, information, such as usage statistics of our website, to our affiliates and third parties.

We do not share your information with any third party for their direct marketing use.

IV. PRIVACY OF THE UNDERAGE

This Site is not designed nor intended to be attractive to, or used by individuals under the age of 21. In the United States, we do not knowingly collect or solicit any information from anyone under the age of [21]. In the EU, we do not knowingly collect or solicit any information from anyone under the age of 18. In the event that we learn that we have inadvertently collected personal information from an individual under age 21, we will delete that information as quickly as possible. If you are under [21 or the legal purchasing age] please do not submit any information to us. If you are aware of someone underage submitting information to us, please contact us at dataprivacy@juul.com.

V. LINKS TO OTHER SITES

We may provide links to other websites for your convenience and information. These sites operate independently from www.juullabscience.com. These sites may have their own privacy statements in place, which we strongly suggest you review if you visit any linked websites. Unless expressly provided to the contrary, the collection and use of your personal information will be governed by the privacy policy applicable to that site. To the extent any linked websites you visit are unrelated to Juul Labs or its affiliates, we are not responsible for their content or any use of the sites.

VI. HOW WE PROTECT PERSONAL INFORMATION

We maintain administrative, technical and physical safeguards for this website to protect against unauthorized disclosure, use, alteration or destruction of the personal information you provide on the site. However, no method of electronic transmission or storage is 100% secure. If we receive instructions using your log-in information we will consider that you have authorized the instructions, so please keep your log-in information secure.

VII. ACCESSING YOUR INFORMATION AND YOUR CHOICES

You can update, amend or delete your information at any time by logging into your account or by contacting us using the information below.

You can exercise your choices with respect to Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>.

VIII. NOTICE TO CALIFORNIA RESIDENTS

A. Information Shared for Direct Marketing Purposes

If you are a California resident, you have the right to receive, once per year, free of charge:

- 1) the identity of any third-party company to which we have disclosed your personal information for that company's direct marketing purpose on our Websites; and
- 2) a description of the categories of personal information disclosed. To request this information, please contact us at dataprivacy@juul.com.

B. Confirmation of Purchases

If you are a California resident who makes a purchase through our ecommerce website, we will make one phone call with an auto dialer and pre-recorded voice to the phone number you provide in order to confirm the order, pursuant to California law.

C. California Consumer Privacy Act Rights ("CCPA")

As of January 1, 2020, verified California residents will have the right to:

- Request and receive disclosure of our personal information collection practices during the prior 12 months, including the categories of personal information we collect, the categories of sources of such information, our business purpose for collecting or sharing such information, and the categories of third parties with whom we share such information;
- Request and receive a copy of the personal information we have collected about them during the prior 12 months;
- Request and receive disclosure of our information sharing practices during the prior 12 months, including a list of the categories of personal information sold with the category of third-party recipients and a list of the categories of personal information that we disclosed for a business purpose;
- Request that we not sell personal information about them; and
- Request that we delete (and direct our service providers to delete) their personal information subject to certain exceptions.

For purposes of the CCPA personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

In order to make a request for disclosure California residents may contact us by visiting <https://juul.force.com/us/s/ccpa> or by calling (844)-668-6900. We will ask you for information that allows us to reasonably verify your identity (that you are the person about whom we collected personal information) by matching information you provide to information in our records and will use that information only for that purpose. If you request specific information collected about you or deletion of information, we may ask you to sign a declaration under penalty of perjury attesting to your identity. We cannot respond to your request or provide you with personal information if we cannot verify your identity and confirm that the personal information relates to you.

You may make a request up to twice within a 12-month period. We will endeavor to respond within forty-five days of receipt of your request, but if we require more time (up to an additional forty-five days) we will notify you of our need for additional time. For requests for a copy of the personal information we have collected during the 12 months prior to your request we will endeavor to provide the information in a format that is readily useable, including by mailing you a paper copy or providing an electronic copy to your registered account, if you have registered an account with us.

We will not discriminate against you as a result of your exercise of any of these rights.

We do not provide personal information to third parties in exchange for monetary consideration, but during the past 12 months, we have disclosed data to certain third parties that provide us with services such as assisting with marketing, data analysis and security, which may fall under the definition of “consideration” and be considered a “sale” under the CCPA.

Our Service is not intended for individuals under the age of 21. We do not knowingly collect or solicit any information from anyone under the age of 21 on this Service. Under CCPA, if you would like to instruct us not to sell your personal information, please visit our Do-Not-Sell web page at <https://support.juul.com/s/ccpa>. We do not sell personal information of individuals we actually know are less than 21 years of age. Once we receive your Do-Not-Sell request we will wait at least 12 months before asking you to reauthorize personal information sales.

During the past 12 months, depending upon which Websites you have visited, we have collected the following categories of information from the listed sources, used it for the listed business purposes and shared it with the listed categories of third parties. The categories of information include information we collect from our website visitors, registered users, employees, vendors, suppliers and any other person that interacts with us either online or offline. Not all information is collected about all individuals. For instance, we may collect different information from applicants for employment or from vendors or from customers.

Categories of Information Collected	How We Collect Your Information	Business Purpose Use for Your Information	Third Parties Receiving Your Information
Identifiers	<ul style="list-style-type: none"> ● Individuals submitting information to us and/or ● Information we automatically collect from 	<ul style="list-style-type: none"> ● Performing Services for You ● Transaction Audits ● Block and remove 	<ul style="list-style-type: none"> ● Service providers (such as payment processors, mail houses, marketing

	<p>site visits and/or</p> <ul style="list-style-type: none"> • Employment information/applications 	<p>fraudulent/unverified users</p> <ul style="list-style-type: none"> • Functionality debugging/error repair • Ad customization • Internal research & development • Quality Control • Compliance with Federal, State and Local regulations • Product Identification & Administration 	<p>partners, shipping partners, employee benefits partners)</p>
<p>Sensitive Information</p>	<ul style="list-style-type: none"> • Individuals submitting information to us and/or • Employment Applications and/or • Employee Information 	<ul style="list-style-type: none"> • Transaction Audits • Security detection, protection and enforcement • Functionality debugging/error repair • Ad customization 	<ul style="list-style-type: none"> • Service Providers (such as payment processors, employee benefits partners)

		<ul style="list-style-type: none"> ● Performing services for you ● Internal research & development ● Quality Control ● Compliance with Federal, State and Local regulations 	
<p>Protected Class Information</p>	<ul style="list-style-type: none"> ● Individuals submitting information to us and/or ● Employment Applications and/or ● Employee Information 	<ul style="list-style-type: none"> ● Transaction Audits ● Security detection, protection and enforcement ● Performing services for you ● Internal research & development ● Quality Control ● Compliance with Federal, State and Local regulations 	<ul style="list-style-type: none"> ● Service Provider (such as employee benefits partners)

<p>Commercial Information</p>	<ul style="list-style-type: none"> • Individuals submitting information and/or • Information we automatically collect from site visitors 	<ul style="list-style-type: none"> • Transaction History, Auditing, Purchase and Use Restrictions, Product Improvement, Product Identification • Security detection, protection and enforcement • Functionality debugging/err or repair • Ad customization • Internal research & development • Quality Control and Assurance • Product Improvement • Compliance with Federal, State and Local regulations 	<ul style="list-style-type: none"> • Service providers (such as marketing partners, shipping partners)
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<p>Electronic Network Activity</p>	<ul style="list-style-type: none"> • Information automatically collected from site visitors 	<ul style="list-style-type: none"> • Transaction Audits • Security detection, protection and enforcement • Functionality debugging/err or repair • Ad customization • Performing services for you • Internal research & development • Quality control 	<ul style="list-style-type: none"> • Service providers (such as payment processors, security detection)
<p>Audio/Video Information</p>	<ul style="list-style-type: none"> • Individuals submitting information and/or • Information we collect for security purposes 	<ul style="list-style-type: none"> • Transaction Audits • Security detection, protection and enforcement • Functionality debugging/err or repair • Ad customization • Performing 	<ul style="list-style-type: none"> • Service providers (such as payment processors, security detection)

		<p>services for you</p> <ul style="list-style-type: none"> • Internal research & development • Quality control 	
Biometrics	<ul style="list-style-type: none"> • Individuals submitting information and/or • Information we collect for security purposes 	<ul style="list-style-type: none"> • Transaction Audits • Security detection, protection and enforcement • Performing services for you • Compliance with Federal, State and Local regulations 	<ul style="list-style-type: none"> • Service providers (such as payment processors, marketing partners, shipping partners)
Geolocation	<ul style="list-style-type: none"> • Information we automatically collect from site visitors 	<ul style="list-style-type: none"> • Transaction Audits • Security detection, protection and enforcement • Functionality debugging/err or repair • Ad 	<ul style="list-style-type: none"> • Service providers (such as marketing partners)

		<p>customization</p> <ul style="list-style-type: none"> • Performing services for you • Internal research & development • Quality Control 	
<p>Inference from Above (Preferences, Characteristics, Behavior, Attitudes, Abilities, etc.)</p>	<ul style="list-style-type: none"> • Internal analytics • Information we automatically collect from site visitors • Information submitted by individuals 	<ul style="list-style-type: none"> • Transaction Audits • Security detection, protection and enforcement • Functionality debugging/err or repair • Ad customization • Performing services for you • Internal research & development • Quality Assurance 	<ul style="list-style-type: none"> • Service providers

IX. NOTICE TO NEVADA RESIDENTS

We do not transfer personal information for monetary consideration. If you would like to tell us not to sell your information in the future please email us at dataprivacy@juul.com with your name, postal address, telephone number and email address with “Nevada do not sell” in the subject line.

X. NOTICE TO UNITED KINGDOM AND EUROPEAN UNION RESIDENTS

For individuals within the United Kingdom (“UK”) and European Economic Area only. Under the GDPR, in certain circumstances, you have the right to: (a) request access to any personal information we hold about you and related information, (b) obtain without undue delay the rectification of any inaccurate personal information, (c) request that your personal information is deleted provided the personal information is not required by us for compliance with a legal obligation under UK, European Union (“EU”), or EU Member State law or for the establishment, exercise, or defense of a legal claim, (d) prevent or restrict processing of your personal information, except to the extent processing is required for the establishment, exercise or defense of legal claims; and (e) request transfer of your personal information directly to a third party where this is technically feasible.

In addition, where you believe that 1stdibs.com has not complied with its obligation under this Privacy Policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner’s Office.

If you wish to exercise your UK or European data subject rights, you have the following options:

- a) You can send an email to: dataprivacy@juul.com
- b) You can contact our Customer Service team at support.juul.co.uk

THE PURPOSES FOR WHICH WE WILL USE YOUR INFORMATION

We have set out below, in a table format, a description of all the ways we may use your information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Lawful basis for processing (including basis of legitimate interest)
To register you as an investigator in the IIR Program and account creation, including validation of your selection and qualification documentation by Juul Labs Scientific Affairs Staff	Performance of a contract with you, for our legitimate interests (to manage and administer the IIR Program)
To manage our relationship with you which will include: communicating with you (such as to	Performance of a contract with you; Necessary to comply with a legal

send you email messages); notifying you about changes to our terms or privacy policy; we may also send you service-related emails or messages (e.g., account verification, change or updates to features of the website, technical and security notices)	obligation; Necessary for our legitimate interests (to manage and administer the IIR Program, effectively provide services and keep our records updated)
To administer and manage your participation in the IIR Program (including submission and approval of study proposals, managing proposals (including sharing proposals with Juul Labs' multi-disciplinary review team) managing and administering IIR written agreements, your registration and account)	Performance of a contract with you; Necessary to comply with a legal or regulatory obligation; Necessary for our legitimate interests (for conducting research studies and running the IIR Program) with your Consent
To facilitate investigator-initiated research studies via the IIR Program, including on the website.	Performance of a contract with you; Necessary to comply with a legal or regulatory obligation.
To administer and protect our business and the website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise); Necessary to comply with a legal obligation

STORAGE AND RETENTION OF INFORMATION

Information collected through the website will be stored in, processed in and subject to the laws of the United States, which may not provide the same level of protection for your information as your home country, and may be available to the United States government or its agencies under a lawful order made in the United States. By using the Website, you consent to such transfer to, storage in and processing within the United States. We will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

XI. UPDATES TO OUR PRIVACY STATEMENT

This Privacy Statement may be updated periodically and without prior notice to you to reflect changes in our online information practices. We will post a prominent notice on this site to notify you of any significant changes to our Privacy Statement and indicate at the top of the statement when it was most recently updated.

XII. HOW TO CONTACT US

If you have any questions or comments about our information practices, Contact Us through email at dataprivacy@juul.com or write to:

JUUL Labs, Inc.
560 20th Street
San Francisco, CA 94107