

Spectrum Pharmaceuticals, Inc. and its affiliates (collectively, "we", "Spectrum", "us", "our") recognizes the importance of protecting your privacy. This Privacy Policy (this "Policy") explains how we collect, use, and disseminate your personal information when you access or use our website at www.sppirx.com and any other program or service that includes an authorized reference to or link to this Policy (the "Services"). If you do not consent to the practices described in this Policy, then do not use the Services.

Spectrum may provide additional privacy notices to individuals at the time we collect their data. For example, we provide a specific privacy notice to clinical trial participants that describes our privacy practices in connection with conducting clinical trials.

California residents, please see our [Special Notice to California Residents](#). European Residents, please see our [Special Notice to European Residents](#).

Children

The Services are not directed at children and we do not knowingly collect personal information via the Services from children under the age of 13. If a child provides us with this type of information online, please contact us to have the account deactivated by sending us an e-mail at privacy@sppirx.com.

Collection of Personal Information

When you use our Services, we collect personal information that you choose to provide voluntarily to us. For example, this information may include:

- *Personal identifiers*, including your name, e-mail address, and phone number;
- *Professional information and educational information*, such as information about your medical specialty;
- *Marketing information*, such as the information you provide when you request a sales representative;
- *Medical information* and other health information;
- *Demographic information*, including your date of birth;
- *Geolocation information*; and
- *Other types of information* that you may provide to us via the Services.

If you provide us with personal information regarding another person, you are responsible for providing them a copy of this Privacy Policy.

We may also collect certain other categories of information automatically, including:

- *Device data*, including information from the devices and browsers you use, such as browser type, device type, device identifiers, and/or IP address, including through the use of cookies and other tracking technologies. See "Cookies" below for more information.
- *Online activity data*, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, which materials you have downloaded, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

We may receive information from commercial sources such as companies that maintain information about healthcare providers and their specialties. We may combine the information we collect from other sources with the information we collect directly from you under this Notice and generate inferences about you.

Cookies

We and our third party partners may use cookies to analyze your visiting patterns and use of the Services, and/or to serve or track advertisements, both on and off the Services.

Cookies are small files that are placed on your computer when you visit a website. Our Services use three types of cookies:

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Marketing cookies are used to track visitors across websites. The intention is to analyze online activity to develop future content and platform enhancements..

Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies.

Depending on your browser, you may be able to disable the use of cookies or remove them from your computer by adjusting your browser settings. Because each browser is different, please consult your browser's help menu for further information about the choices available to you. If you disable browser cookies, it may interfere with the proper functioning of the Services.

How We Use Your Personal Information

We may use the data we collect, including your personal information for:

Service Delivery. We may use your personal information to: provide you with products and services, such as to complete registration, fulfill transactions that have been requested, and to manage the Services; improve our products and services, including the Services, and identify, develop, and offer new or expanded products and services; and to personalize your experience with the Services, including customizing the content and/or format of the pages of our websites that you visit.

Marketing and advertising. Notify you about updates, products, services, and/or special offers that may be relevant to you, both on and off the Services.

Compliance and protection. To secure, protect, enforce, or defend the legal rights, privacy, safety, or property of Spectrum Pharmaceuticals, Inc., the Services, its employees, agents, or other users, or to comply with law.

Research and development. Conduct analysis, generate aggregate data, which is not subject to this Policy, or otherwise conduct research related to our products and services and the use of the Services.

Disclosure of Your Personal Information

We also disclose your personal information to certain third parties with whom we have a direct or indirect business or contract relationship:

Affiliates. We may share information within our family of affiliated companies.

Service Providers. We also may share your information with those providing services to us or on our behalf. For example, we may disclose information to third parties that provide administrative or processing services for us, customer support, email delivery, marketing or printing, mailing, and/or payment processing, or to those providing hosting services to us.

Business partners. We may share your information with business partners, including to provide the products and services you have requested.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. To secure, protect, enforce or defend the legal rights, privacy, safety, or property of Spectrum Pharmaceuticals, Inc., the Services, its employees, agents, or users. To comply with law and in response to legal processes such as subpoenas and to cooperate with law enforcement authorities and other governmental authorities consistent with applicable laws, including, for example, to comply with regulatory requirements relating to the safety and efficacy of our products and services.

Business transferees. In connection with a corporate transaction, such as a merger or acquisition (or negotiations of or due diligence for such transactions), a disposition of all or any portion of the business assets, or equity interests in, or in connection with a bankruptcy reorganization.

Otherwise with your consent or at your direction, such as when you use interactive features of our Services.

Choices

If you have registered for an account with us through the Service, you may review and update certain information by logging into the account.

You may opt out of receiving certain communications from Spectrum Pharmaceuticals, such as e-mail. Please follow the unsubscribe instructions in our emails or contact privacy@sppirx.com. Remember, however, that Spectrum Pharmaceuticals may still send e-mail or call you in order to provide a product or service that you request and for other non-commercial purposes, where permitted by law.

Do Not Track

Although the Services currently do not have a mechanism to recognize the various web browser Do Not Track signals, we do offer you choices to manage your preferences as described in the sections above. To learn more about browser tracking signals and Do Not Track please visit <http://www.allaboutdnt.org>

Links to Third-Party Sites

The Services may contain links to other third-party websites and services. Spectrum Pharmaceuticals does not control the privacy policies or practices of these third-party sites. You should review those policies before providing any information. Spectrum Pharmaceuticals is not responsible for the content or practices of any linked third-party sites, and we provide these links solely for the convenience and information of our visitors.

Security

Spectrum Pharmaceuticals has established commercially reasonable safeguards to help prevent unauthorized access to or misuse of your personal information that is stored on our systems. However, no data storage system or transmission of data over the internet or any other public network can be guaranteed to be 100 percent secure. If you use Services that require a password, you should never disclose your password to anyone. Spectrum Pharmaceuticals will never ask you for your password in an unsolicited phone call or e-mail. You are responsible for maintaining the secrecy of your passwords and any account information.

Changes

Spectrum Pharmaceuticals reserves the right to change this Policy to respond to new laws, regulations, technology, or for other business reasons. Please check this Policy from time to time to review any such changes.

Contact Information

Generally, Spectrum Pharmaceuticals is the controller in relation to the collection and processing of personal information through the Services. If you have any questions or concerns about this Policy, you may contact us by e-mail at privacy@sppirx.com or write to us in care of: Spectrum Pharmaceuticals, Inc., 11500 S. Eastern Ave., Suite 240, Henderson, NV 89052.

Special Notice to California Residents

This section supplements the description of our personal information collection and sharing practices elsewhere in this Policy to provide certain disclosures to California residents whose personal information Spectrum Pharmaceuticals processes pursuant to the California Consumer Privacy Act (“CCPA”). Please note that these disclosures do not apply to personal information that is exempt from the CCPA, including personal information that is governed by the Health Insurance Portability and Accountability Act of 1996, California’s Confidentiality of Medical Information Act, or personal information related to our business contacts (including healthcare providers).

We do not treat the ways we share your information as a sale of your information to third parties for money or other valuable consideration, although we do share your information with third parties as discussed in this Policy.

The chart below summarizes the personal information we collect and describes our practices currently and during the 12 months preceding the effective date of this privacy policy. The terms in the chart refer to the categories of information, sources, purposes and third parties described above in this privacy policy in more detail. Information you voluntarily provide to use, such as in free-form webforms, may contain other categories of personal information not described below. See the following sections of our privacy policy for details:

- [Collection of Personal Information](#)
- [How We Use Your Personal Information](#)
- [Disclosure of Your Personal Information](#)

Statutory category / Personal information we collect in this category	Source of PI	Business/ commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose
<u>Identifiers (online)</u> • <i>Personal identifiers</i>	• <i>You</i> • <i>Third-party sources</i>	• <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing & advertising</i> • <i>Compliance & protection</i>	• <i>Affiliates</i> • <i>Service providers</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business partners</i>

<p><u>Identifiers (other)</u></p> <ul style="list-style-type: none"> • Profile data • Device data 	<ul style="list-style-type: none"> • You • Third-party sources • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing & advertising • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Service providers • Professional advisors • Authorities and others • Business transferees • Business partners
<p><u>Commercial Information</u></p> <ul style="list-style-type: none"> • Online activity data 	<ul style="list-style-type: none"> • You • Third-party sources • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing & advertising • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Service providers • Professional advisors • Authorities and others • Business transferees • Business partners
<p><u>Internet or Network Information</u></p> <ul style="list-style-type: none"> • Device data • Online activity data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing & advertising • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Service providers • Professional advisors • Authorities and others • Business transferees • Business partners
<p><u>Geolocation Data</u></p> <ul style="list-style-type: none"> • Geolocation information 	<ul style="list-style-type: none"> • You 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing & advertising • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Service providers • Professional advisors • Authorities and others • Business transferees • Business partners
<p><u>Inferences</u></p> <ul style="list-style-type: none"> • Personal identifiers • Demographic information • Geolocation information • Device data • Online activity data 	<p>N/A</p>	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing & advertising • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Service providers • Authorities and others • Business transferees • Business partners

Your California Privacy Rights. California residents have the rights listed below under the CCPA:

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.

- The categories of third parties with which we share Personal Information.
- The categories of Personal Information that we sold or disclosed for a business purpose.
- The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Nondiscrimination.** Consistent with California law, if you choose to exercise your rights, we will not charge you different prices or provide different quality of services unless those differences are related to your information or otherwise permitted by law.

Please note that these rights are not absolute. For example, we may not delete information we are required to retain for regulatory reasons, certain internal business purposes, or where otherwise provided for by law. As another example, we will not respond to a request if we cannot verify you as the requestor.

Once we receive your request, we may verify it by requesting information sufficient to confirm your identity, including by asking you for additional information. If you would like to use an agent registered with the California Secretary of State to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf.

Exercising your right to information, access and deletion. Please submit your request by sending an email to privacy@sppirx.com or writing to our Privacy Officer at 11500 S. Eastern Ave., Suite 240 Henderson, NV 89052.

California Civil Code Section 1798.83 permits California residents once a year to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. If you are a California resident and wish to make such a request, please send an e-mail to privacy@sppirx.com and include the phrase California Shine the Light Request in the subject line, and provide us with your name, address and e-mail address.

Special Notice to European Residents

The information provided in this “Notice to European Users” section applies only to individuals in the United Kingdom, Switzerland, and the European Economic Area (hereafter collectively referred to as “Europe”).

Legal bases for processing. We use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described in the table below.

Processing purpose <i>Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information”.</i>	Legal basis
Service delivery	Processing is necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services. If we have not entered into a

	contract with you, we process your personal information based on our legitimate interest in providing the services you access and request.
<ul style="list-style-type: none"> • Marketing and advertising • Compliance and protection • Research and development 	These activities may constitute our legitimate interests, may be necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services, or may be based on your consent. To the extent that these activities constitute our legitimate interests, we do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
To comply with applicable law	Processing is necessary to comply with our legal obligations.

How we process and protect your personal data; how long we store it. We collect and process your personal data responsibly and only for the purposes for which it was intended, as set forth in this Privacy Notice and in accordance with applicable laws. We apply adequate technical and organizational security measures, commensurate with the level of known risk, in order to protect the confidentiality and integrity of the personal data we collect on this Site. We store your personal data only for as long as necessary for Spectrum Pharmaceuticals to fulfil the purposes for which the data was collected, or when applicable, for as long as Spectrum Pharmaceuticals is legally required to retain the data.

With whom we share your personal data. In connection with the features available on this Site, it may be necessary to share your personal data with Spectrum Pharmaceuticals’ affiliates and service providers. Specifically, such sharing of data may be necessary in order to respond to your inquiry, to provide access to additional information, or to follow up on your inquiry and inform you about new developments

Cross-border data transfers. If we transfer your personal information from Europe to another country such that we are required to apply appropriate safeguards to your personal information under European data protection laws, we will do so. Please contact us for further information about any such transfers or the specific safeguards applied.

Sensitive personal information. If you provide us with any sensitive personal information, including health information, to us when you use the services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our services.

Your rights. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.

- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to privacy@sppirx.com or our [postal address provided above](#). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

If you have any general questions or concerns about data protection, the Spectrum's Privacy Officer can be contacted at privacy@sppirx.com.