Privacy Policy_V1.2

Effective Date: 8/6/2026 Last Updated: 8/5/2026

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1. Scope of This Policy

Oterus Biosystems Inc. ("Oterus Bio," "we," "us," or "our") respects your privacy. This Privacy Policy explains what information we collect through our website and in connection with the sale of our research-use-only ("RUO") laboratory products, how we use that information, how we share it, and the choices available to you.

This policy does not apply to data generated through clinical studies, institutional review board ("IRB") protocols, or research collaborations with laboratories, clinics, or academic institutions. Information exchanged under those arrangements is governed by the applicable study protocol, material transfer agreement, confidentiality agreement, or research agreement, and not by this policy.

Our products are sold for research use only and are not intended for diagnostic or therapeutic procedures. Purchases are additionally subject to our Terms of Sale.

2. Information We Collect

Information you provide to us

- Contact and account details, such as your name, institution or company, job title, email address, and telephone number.
- Shipping and billing addresses, and the name of the receiving individual or department.
- Order information, including products purchased, quantities, purchase order numbers, and order history.
- Information you provide when you contact us with an inquiry, support request, or quotation request, including the contents of your message.
- Information you provide when you subscribe to updates or marketing communications.

Payment information

Payments are processed by third-party payment processors that are certified as compliant with the Payment Card Industry Data Security Standard (PCI DSS). Payment card numbers are transmitted directly to that processor. We do not receive or store full payment card numbers. We may receive limited transaction data such as the last four digits of the card, the card brand, the billing name and address, and whether the transaction succeeded.

Information collected automatically

When you visit our website, we and our service providers may automatically collect your IP address, browser type and version, operating system and device information, referring and exit pages, the pages you view, and the dates and times of your visits. This information is collected through cookies and similar technologies as described in Section 6.

3. How We Use Your Information

- To process, fulfil, and ship your orders, and to provide order confirmations, invoices, and customer support.
- To respond to your inquiries, quotation requests, and support requests.
- To send you product updates, technical information, and marketing communications, where you have opted in or where otherwise permitted by law. You may opt out at any time as described in Section 8.
- To operate, maintain, secure, and improve our website and product offerings.
- To detect, investigate, and prevent fraud, security incidents, and misuse of our website or products.
- To comply with our legal and regulatory obligations, including tax and accounting requirements, product safety and traceability obligations, and applicable trade and export control laws, which may require us to screen orders and recipients against government-maintained restricted party lists.

4. Legal Bases for Processing (Visitors in the EEA and United Kingdom)

If you are located in the European Economic Area or the United Kingdom, we process your personal data on the following legal bases: performance of a contract with you, or steps taken at your request before entering into a contract, in order to process and fulfil orders; our legitimate interests in operating, securing, and improving our business, where those interests are not overridden by your rights; your consent, where we rely on it, which you may withdraw at any time; and compliance with a legal obligation to which we are subject.

5. How We Share Your Information

We do not sell or rent your personal information, and we do not share it for cross-context behavioral advertising or targeted advertising purposes. We share information only in the following circumstances:

- With service providers who perform functions on our behalf, including payment processing, shipping and logistics, website hosting, email delivery, analytics, and customer support. These providers are permitted to use the information only to perform services for us and are required to protect it.
- With our professional advisers, such as accountants, auditors, and legal counsel, where reasonably necessary and subject to confidentiality obligations.
- Where required to comply with applicable law, legal process, or a governmental or regulatory request, or to establish, exercise, or defend legal claims.
- In connection with a merger, acquisition, financing, reorganization, or sale of all or part of our business, subject to the recipient continuing to protect the information in a manner consistent with this policy.
- With your consent, or at your direction.

6. Cookies and Similar Technologies

Our website uses cookies and similar technologies for the following purposes:

- **Strictly necessary cookies** that enable core site functions such as navigation, shopping cart operation, and secure checkout. The site will not function properly without these.
- **Functional cookies** that remember your preferences and settings.

Most browsers allow you to refuse or delete cookies through their settings. If you disable cookies, some parts of our website may not function properly. Where required by applicable law, we will obtain your consent before setting non-essential cookies.

7. Do Not Track Signals and Third-Party Tracking

Do Not Track. Some browsers offer a "Do Not Track" ("DNT") setting that sends a signal to websites you visit. There is currently no accepted industry or legal standard governing how websites should respond to DNT signals. Our website does not currently respond to DNT signals. If a common standard is adopted, we will update this policy accordingly.

Third-party tracking across sites. Third parties, including analytics providers whose cookies are set on our website, may collect information about your online activities over time and across third-party websites or online services. We do not control those third parties' collection practices, and this policy does not apply to them.

8. Your Choices and Your Rights

Marketing communications

You may opt out of marketing communications at any time by clicking the unsubscribe link contained in any marketing email, or by contacting us using the details in Section 14. We will continue to send you transactional messages relating to your orders, such as order confirmations and shipping notices.

Reviewing, correcting, and deleting your information

You may request access to the personal information we hold about you, request that we correct inaccurate information, or request that we delete information we no longer need to retain. To make a request, contact us using the details in Section 14. We will respond within 45 days, and will tell you if we need additional time. We may need to verify your identity before acting on a request, and we may decline a request where we are required or permitted by law to retain the information.

Additional rights for individuals in the EEA and United Kingdom

If you are located in the EEA or the United Kingdom, you also have the right to object to or request restriction of processing, the right to data portability, the right to withdraw consent at any time where we rely on consent, and the right to lodge a complaint with your local data protection supervisory authority.

9. How Long We Keep Your Information

We retain personal information only for as long as necessary for the purposes described in this policy. Our general retention periods are:

- Order, invoice, and transaction records: seven (7) years from the date of the transaction, to meet tax, accounting, and product traceability requirements.
- Customer contact and account records: for the duration of the customer relationship and for three (3) years thereafter.
- Marketing subscriber records: until you opt out, and for a short period thereafter to record and honor your opt-out.
- Inquiries and support correspondence: twenty-four (24) months from the date of last contact.

- Website analytics data: twenty-six (26) months.

10. Security

We use reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, use, alteration, and destruction. These include encryption of data in transit to our website, access controls limiting employee access to information on a need-to-know basis, and the use of PCI DSS compliant payment processors for card transactions. As noted in Section 2, we do not store full payment card numbers.

No method of transmission over the internet or method of electronic storage is completely secure, and we cannot guarantee absolute security.

11. Notification of Security Incidents

If a security incident affecting your personal information occurs, we will notify you and any applicable regulator as required by law, without unreasonable delay and within the timeframes prescribed by the applicable legislation.

12. International Users and Transfers of Information

We are based in the United States, and the information we collect is processed and stored in the United States. Our service providers may process information in other countries. If you access our website or purchase our products from outside the United States, you understand that your information will be transferred to, stored in, and processed in the United States, where data protection laws may differ from those in your country. Where required by applicable law, we implement appropriate safeguards for such transfers, including standard contractual clauses.

13. Children's Privacy

Our website and products are directed to research professionals and institutions, and are not directed to children. We do not knowingly collect personal information from anyone under the age of sixteen (16). If you believe we have collected such information, please contact us and we will delete it.

14. Links to Other Websites

Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of those websites, and we encourage you to review their privacy policies.

15. Changes to This Policy

We may update this Privacy Policy from time to time. We will post the updated policy on this page and revise the "Last Updated" date above. If we make material changes, we will provide notice by email to subscribers and customers for whom we hold an email address, or by a prominent notice on our website, before the changes take effect.

16. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or your personal information, contact us at:

Oterus Biosystems Inc.

Attention: **Barbara Anderson**

2040 Oliver Avenue, San Diego, CA 92109, USA

Email: **info@oterusbio.com**