

eNeura Inc (**We**) understand the sensitivity of information about your health and the importance of protecting your privacy. Your confidence in our ability to protect your information is paramount.

This policy (together with our terms of website use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. We may collect personal data from you through our site (www.eNeura.com) (**our site**) and other online resources (such as e-mail and the Spring TMS Journal).

We treat your personal data:

- confidentially;
- in accordance with this policy; and
- in accordance with the Data Protection Act 1998 (the **Act**) which regulates the collection, storage, processing, access and transfer of personal data.

For the purpose of the Act, the data controller for UK customers is eNeura (UK) Ltd., 6th Floor, One London Wall, London EC2Y 5EB United Kingdom. For the purposes of USA customers, the data controller is eNeura Inc., 240 North Wolfe Road, Sunnyvale, CA 94085, USA.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

U.S.-EUROPEAN SAFE HARBOR FRAMEWORK

eNeura complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. We have certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification page, please visit <http://www.export.gov/safeharbor/>

INFORMATION WE MAY COLLECT FROM YOU

You can access most of the pages on our site without giving us your personal information and we only collect personal data about you if you choose to give it to us. We may collect and process the following data about you:

- Information that you provide by filling in forms on our site. This includes information and sensitive personal data concerning health matters (such as your Spring TMS device number) provided when logging into and using Spring TMS Journal or requesting further services. We may also ask you for information when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.

- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our site including, but not limited to, traffic data, location data and other communication data and the resources that you access.

IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our user/patient numbers and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual preferences.
- To speed up your searches for information and results.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (the **EEA**), such as the United States, whose data protection laws differ from those of the UK. It may also be processed by staff operating outside the EEA, who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of technological support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy, including ensuring that appropriate protections are in place to require the relevant data processor in any destination outside of the EEA to maintain protections on the data that are equivalent to those that apply in the UK.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To provide you with information or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes, including the logging and processing of your data via the Spring TMS Journal.
- To build a database and to analyse that database as part of our ongoing research into migraine treatment
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To notify you about changes to our service.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group from time to time, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006, as well as our Representative.

We may disclose your personal information to third parties:

- In the event that we wish to further analyse the data you submit via the Spring TMS Journal with our panel of medical experts and/or your medical advisors as part of your ongoing treatment.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of website use; or
- to protect the rights, property, or safety of eNeura, our registered users, or others.

We may disclose your de-identified information to third parties:

- With your permission, in the event that we wish to share our data with academic or research-based institutions for use in relevant studies. In these instances, we will inform you in advance and you will have the opportunity to opt out of the study. The information that will be used will be made anonymous and will be disclosed confidentially.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If eNeura or substantially all of its assets are acquired by a third party, in which case personal data held by it about its registered users will be one of the transferred assets.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at customercare@eNeura.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

PRIVACY COMPLAINTS BY EUROPEAN UNION CITIZENS:

In compliance with the Safe Harbor Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this privacy policy should first contact us at:

eNeura (UK) Ltd
Attn: Customer Care
6 Hawksworth, Southmead Park
Didcot, Oxfordshire, OX11 7HR
United Kingdom

Or email: customercare@eNeura.co.uk

We have further committed to refer unresolved privacy complaints under the Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by us, you may contact the BBB EU SAFE HARBOR program at the address below:

Council of Better Business Bureaus, Inc.
BBB EU SAFE HARBOR
3033 Wilson Boulevard, Suite 600
Arlington, VA 22201
Phone: 703-276-0100
Web: www.bbb.org/us/safe-harbor-complaints

CHILDREN

Our site is intended for use by adults. We will not collect any personal data from person we know to be under the age of 18 without the prior, written consent of that person's parent or adult legal representative, who will have the right to request access to, or deletion of, the information provided by the child.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to customercare@eNeura.co.uk