



Privacy Notice

Effective date: February 16, 2021

Last updated: August 29, 2023

At Tarsus Pharmaceuticals, Inc. (“Tarsus,” “we,” “us,” or “our”), we take your privacy seriously. Please read this Privacy Notice to learn what personal information we may process (e.g., collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase, or destroy), how we protect it, and your rights and choices with respect to your personal information. This Privacy Notice applies to all Tarsus operations as well as websites, mobile applications and digital services (“Services”). **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use, and share your information as described in this Privacy Notice.**

Please note that the Services are currently only available to U.S. citizens or permanent residents age 18 and older. You may not use the Services if you are under the age of 18 or not a U.S. citizen or permanent resident.

Remember that your use of Tarsus’s Services is at all times subject to our [Terms of Use](#), which incorporates this Privacy Notice. Any terms we use in this Privacy Notice without defining them have the definitions given to them in the Terms of Use.

If you have a disability, you may access this Privacy Notice in an alternative format by contacting privacy@tarsusrx.com.

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What this Privacy Notice Covers

This Privacy Notice covers how we treat Personal Data that we gather when you access or use our Services. “**Personal Data**” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules, or regulations.

Personal Data

Categories of Personal Data We Collect

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties With Whom We Share Personal Data
A. Identifiers.	First and last name; email; address; and phone number.	Service providers; advertising partners; analytics partners and other parties you may authorize
B. Personal information categories listed in the California Customer Records statute.	First and last name.	Service providers; advertising partners; analytics partners and other parties you may authorize
C. Protected classification characteristics under California or federal law.	Age (of individuals 40 years or older) and marital status.	Service providers; advertising partners; analytics partners and other parties you may authorize
D. Commercial information.	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Service providers; advertising partners; analytics partners and other parties you may authorize
E. Biometric information.	None.	N/A
F. Internet or other similar network activity.	Browsing history, search history, social media information, information on a consumer's interaction with a website, application, or advertisement.	Service providers; advertising partners; Analytics partners and other parties you may authorize
G. Geolocation data.	IP address based location information and GPS data.	Service providers; advertising partners; analytics partners and other parties you may authorize.
H. Sensory data.	None.	N/A
I. Professional or employment-related information.	Occupation and professional memberships.	Service providers; advertising partners; analytics partners and other parties you may authorize
J. Non-public education information	School records and transcripts	Service providers and other parties you may authorize
K. Transactional Data	Clinical trial participation, interactions with company, etc.	Service providers; advertising partners; analytics partners and other parties you may authorize
L. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Service providers; advertising partners; analytics partners and other parties you may authorize

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

You

When you provide such information directly to us.

- When you use our interactive tools and Services.

- When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
- When you send us an email or otherwise contact us.

When you use the Services and such information is collected automatically.

- Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
- If you use a location-enabled browser, we may receive information about your location.
- If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services.

Third Parties

Vendors, Suppliers, Contractors, Associations and Business Partners

- We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.

Advertising Partners

- We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.

Others

- Consumers and customers
- Employees, former employees, potential employees and family members
- Government officials
- Investors and shareholders
- Publicly available sources

Our Commercial or Business Purposes for Collecting Personal Data

- Providing, Customizing and Improving the Services
 - Providing you with the products, services or information you request.
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Services.
 - Improving the Services, including testing, research, internal analytics and product development.
 - Personalizing the Services, website content and communications based on your preferences.
 - Business and market research.
 - Doing fraud protection, security and debugging.
 - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act (the “CCPA”).
- Marketing the Services
 - Marketing and selling the Services.
 - Showing you advertisements, including interest-based or online behavioral advertising.
- Corresponding with You
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Tarsus or the Services.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- Meeting Legal Requirements and Enforcing Legal Terms
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities, adverse event and product complaint reporting, exercising or defending legal claims, financial disclosure reporting, maintaining patient registries.
 - Protecting the rights, property or safety of you, Tarsus or another party.

- Enforcing any agreements with you.
- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.
- Other purposes
 - Activities for public health and interest.
 - Activities as an employer to support and fulfill our obligations to employees.
 - Contracting and business planning activities.
 - Data and statistical analytics.
 - Engaging scientific experts and leaders.
 - Event management.
 - Finance and tax activities.
 - Patient testimonials.
 - Study recruitment and management, including monitoring study activities.

How We Share Your Personal Data

We may disclose your Personal Data to the categories of service providers and other parties listed in this section.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Security and fraud prevention consultants.
 - Support and customer service vendors.
 - Product fulfillment and delivery providers.
- **Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include:
 - Ad networks.
 - Marketing providers.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
 - Companies that track how users found or were referred to the Services.
 - Companies that track how users interact with the Services.
- **Parties You Authorize, Access or Authenticate**
 - Third parties you access through the Services.
- Government officials (e.g., law enforcement authorities, the courts, regulatory authorities)
- Tarsus employees and affiliates
- Vendors, suppliers and contractors

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified, or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified, or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build, and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files — placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/ Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google Inc. (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.
- **Retargeting/Advertising Cookies.** Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

In addition, our websites may use social media plug-ins to enable you to share information with others easily. When you visit our websites, the operator of the social media plug-in that is on our website can place a cookie on your computer that lets that operator recognize individuals on their website who have previously visited our sites. Social media plug-ins may allow social media websites to receive directly identifiable information about you that shows you have visited our website. The social media plug-in may collect this information for visitors, whether or not they specifically interact with the plug-in on our website. Social media plug-ins also allow the social media website to share information about your activities on our website with other users of their social media website. Tarsus does not control any of the content from social media plug-ins. For more information about social plug-ins from social media websites, you should refer to those sites’ privacy and data-sharing statements.

Information about Interest-Based Advertisements:

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users’ activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

We comply with the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles for Online Behavioral Advertising. Through the DAA and Network Advertising Initiative (“NAI”), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of, and greater control over, ads that are customized based on a consumer’s online behavior across different websites and properties. To make choices about Interest-Based Ads from participating third parties, including to opt-out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA’s or NAI’s consumer opt-out pages, which are located at <http://www.networkadvertising.org/choices/> or www.aboutads.info/choices.

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using reasonable and appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under sixteen (16) years of age; if you are a child under the age of sixteen (16), please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under sixteen (16) years of age, we will delete that information as quickly as possible. If you believe that a child under sixteen (16) years of age may have provided Personal Data to us, please contact us at privacy@tarsusrx.com.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such Personal Data.

If there are any conflicts between this section and any other provision of this Privacy Notice and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@tarsusrx.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.

- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request. We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Call us at: (949) 418-1801
- Email us at: privacy@tarsusrx.com
- Submit a form at this address: <https://tarsusrx.com/#contact>

You may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Personal Data Sales Opt-Out and Opt-In

You have the right to request that we do not sell your Personal Data and that we do not share your Personal Data to third parties for cross-context behavioral advertising. We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 16 years of age. To request that we no longer share your Personal Data for the purpose of behavioral advertising, click here [DO NOT SHARE MY PERSONAL DATA]. You may also email your request to us at privacy@tarsusrx.com with the subject line "Do Not Share My Personal Data."

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Other State Law Privacy Rights

California Resident Rights

California's "Shine the Light" law (Cal. Civ. Code §1798.83) permits users of our Services that are California residents to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at privacy@tarsusrx.com.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at privacy@tarsusrx.com with the subject line "Nevada Do Not Sell Request" and providing us with your name.

Changes to this Privacy Notice

We're constantly trying to improve our Services, so we may need to change this Privacy Notice from time to time, and will make the updated Notice available on this page. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Notice have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Notice in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- (949) 418-1801
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