

EXTERNAL DATA PRIVACY POLICY

1 GENERAL

- 1.1 This privacy policy ("**Privacy Policy**"), describes how Ilya Pharma AB, registration number 559062-6015, Dag Hammarskiölds väg 30, SE-752 37 Uppsala Sweden ("**Ilya Pharma**"), collects, uses, discloses, stores and otherwise processes personal data.
- 1.2 We respect your right to privacy, and we are committed to comply with applicable data protection rules and to safeguard your rights. We want to make sure that you are aware of what types of information we collect or obtain from you via the website or during your communication or interaction with us, how this information is used and how we work to protect it.
- 1.3 This Privacy Policy describes, amongst other things, which information we collect about you, how your personal data is processed and for what purposes we collect and use the personal data. This Privacy Policy also describes your rights and how you can contact us about the use of your personal data.

2 WHAT TYPES OF PERSONAL DATA DO WE PROCESS?

- 2.1 Personal data means all types of information which can, directly or indirectly, be used to identify a living physical person ("**Personal Data**").
- 2.2 Ilya Pharma collects information that is necessary for us to be able to contact you in your role as a representative for an organization, governmental or regional agency, or a company. Ilya Pharma collects and processes information about you if you represent an organization/agency/company that is, or will potentially become a supplier, contractor or otherwise a partner of ours, as well as a national or regional agency or otherwise. The information that we collect and process in such cases include contact information (such as name, address, work title, what organization/agency/company you work for, email address and telephone number).
- 2.3 Ilya Pharma also collects Personal Data in connection with recruiting staff members. When you contact us to apply for a job, we collect such Personal Data that you provide us with in connection with such application. Personal Data normally included in job applications are contact information (name, address, email address and telephone number), CV (including previous work experience and education), personal registration number and occasionally picture.
- 2.4 Furthermore, Ilya Pharma collects and processes Personal Data about you when you choose to participate in a study sponsored by Ilya Pharma. Personal Data that Ilya Pharma collects and processes in such cases include a coded identifier and decoding in the event of AEs follows EudraVigilance procedures.
- 2.5 Additionally, Ilya Pharma collects data about you that we need to improve, streamline, simplify and develop our website, www.ilyapharma.se, such as IP address, cookies or similar information.

3 WHY DO WE PROCESS YOUR PERSONAL DATA?

- 3.1 Ilya Pharma collects and process Personal Data relating to you for the following reasons:

- (i) to respond to communications you have sent us;
- (ii) to contact you as a representative for a governmental or regional agency,
- (iii) to contact you as a representative of a supplier, contractor or otherwise a partner of ours, and to, if applicable, administer the agreement between Ilya Pharma and such supplier, contractor or partner;
- (iv) to market ourselves and our services and invite you to events we believe might be of interest to you or the company that you represent (provided however, that you will always have the right to opt-out of any marketing messages from us);
- (v) to process job applications;
- (vi) to conduct clinical studies (only with your prior consent subject to separate information);
- (vii) to improve, streamline, simplify and develop our website, and
- (viii) to fulfil requirements by law.

4 THE LEGAL BASES FOR PROCESSING PERSONAL DATA

Ilya Pharma's processing of your Personal Data is based on the legal grounds as follows.

Legitimate interests

- 4.1 The legitimate interest of Ilya Pharma constitutes the legal basis for processing in situations where you provide us with your contact information by handing us a business card or otherwise has expressed an interest in our products or services. The legitimate interests of Ilya Pharma in such cases are for Ilya Pharma to be able to market its products and services.
- 4.2 Furthermore, the legitimate interest of Ilya Pharma is the legal basis for when Ilya Pharma is processing your personal data when you are a representative for a supplier, governmental or national agency, contractor or otherwise a partner of ours. The legitimate interests of Ilya Pharma in such cases are Ilya Pharma's need to contact you as a representative to administer the relationship Ilya Pharma has with the company/agency/organization that you represent.
- 4.3 The legitimate interest of Ilya Pharma is the legal basis for Ilya Pharma's processing of your Personal Data in connection with your job application, in which cases the legitimate interests of Ilya Pharma are to be able to secure that its employees has sufficient education and experience.
- 4.4 Ilya Pharma's processing of your personal data collected from your visit of our website is based on the legitimate interest of Ilya Pharma. The legitimate interest is that the processing is necessary for Ilya Pharma to be able to improve, streamline, simplify and develop its website in order to market itself.

Legal obligation

- 4.5 Ilya Pharma may process your Personal Data for the purpose of complying with statutory requirements, based on the legal ground that this is necessary for

compliance with a legal obligation to which Ilya Pharma is subject, such as accounting regulations.

5 FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?

- 5.1 Your Personal Data is stored only for as long as there is a need to keep the data in order to fulfil the purposes for which the data was collected in accordance with this Privacy Policy.
- 5.2 The Personal Data will be deleted if the purpose of collection and use of Personal Data has been achieved, or if you withdraw your consent (if applicable) to the processing of Personal Data by contacting us (for contact information, please see Section 10 below). Personal Data received in connection with a job application for an applicant that is not hired will be stored for no longer than two years after the date of the application.

6 HOW MAY YOUR PERSONAL DATA BE SHARED?

- 6.1 Ilya Pharma will not sell, trade or lease your Personal Data to third parties. However, Ilya Pharma may share Personal Data with our trusted subcontractors and/or co-operation partners if needed for the performance of our business. They may need access to your Personal Data in their assignment for us, but they will not be allowed to use the Personal Data for any other purpose.
- 6.2 Unless otherwise set forth below or in any specific information regarding our processing of your Personal Data, Ilya Pharma will not transfer your Personal Data to any country outside the EU/EEA.
- 6.3 Personal Data that Ilya Pharma collect may be transferred to IT service providers established outside of EU/EEA as a part of such IT service provider's provision of services to Ilya Pharma. Personal Data will also be transferred to USA through Ilya Pharma's use of Office 365 (Microsoft) and Google Analytics. Ilya Pharma has ensured that your rights are guaranteed before making such transfer to USA by Microsoft's and Google's adherence to EU-US Privacy Shield. More information is available at www.privacyshield.gov. Furthermore, Personal Data will be transferred to USA through Ilya Pharma's use of doDOC and DocuSign. Ilya Pharma has ensured that your rights are guaranteed before making such transfer to USA by doDOC's and DocuSign's adherence to their respective group of companies' binding corporate rules (BCR).
- 6.4 Personal Data may be disclosed by Ilya Pharma to comply with legal requirements or other requirements from official authorities, in order to safeguard Ilya Pharma's legal interests or to detect, prevent, or draw attention to frauds or other safety or technical problems.
- 6.5 Should Ilya Pharma intend to transfer all or part of its business, personal data may be disclosed to a potential buyer.

7 PROTECTION OF YOUR PERSONAL DATA

- 7.1 You should always feel secure when you provide your Personal Data to us. We have employed a wide range of security measures to help protect your Personal Data against undue access, modification and deletion.

- 7.2 We protect your Personal Data using commercially reasonable safeguards to prevent loss, misuse, unauthorized access, disclosure, alteration, and destruction. These measures include, passwords, automatic timeouts and one-time access links that expire within hours. Therefore, you can rest assure that your Personal Data is in safe hands.

8 YOUR RIGHTS

Access, rectification and erasure

- 8.1 You are always entitled to obtain access to your Personal Data and receive a copy of the Personal Data being processed.
- 8.2 You are also entitled to request that we correct or update any inaccurate personal data.

Restriction of use and data portability

- 8.3 Under certain circumstances (expressed in applicable data protection legislation), you may request that Ilya Pharma restricts the use of your Personal Data or delete your Personal Data. In some cases, you have the right to obtain the Personal Data you have provided us with in a structured and machine-readable format. You may also have the right to transmit the data to another controller where technically feasible.

Object

- 8.4 You have the right to object to any processing based on our legitimate interests.

Requests and Complaints

- 8.5 If you wish to exercise any of the abovementioned rights or if you have any questions regarding Personal Data held by us or this online Privacy Policy, please do not hesitate to contact us (for contact information, please see section 10 below).
- 8.6 Should you be dissatisfied with our processing of your Personal Data, please let us know, and we will do our best to meet your complaints. Your integrity is very important to us, and we always strive to protect and secure your Personal Data in the best possible way. Should we nevertheless, in your opinion, fail in this ambition, please note that you are also entitled to lodge a complaint with the Swedish Data Protection Authority (Sw. *Datainspektionen*), or such other authority as may be determined in the future.

9 CHANGES TO THIS PRIVACY POLICY

Ilya Pharma may, at any time, make amendments to this Privacy Policy. Ilya Pharma will publish the amended version at our website. If the amendments are substantial, Ilya Pharma will send the amended Privacy Policy to your email, and if Ilya Pharma does not have your email, Ilya Pharma will send it to you by other means (if possible).

10 HOW TO CONTACT US

You can contact us at: Ilya Pharma AB, Dag Hammarskiölds väg 30, SE-752 37 Uppsala, Sweden, or at our email: info@ilyapharma.se.