

Privacy Policy

Purpose

Ascelia Pharma (“we”, “us”) respects your right to privacy. This privacy policy explains who we are, how we collect, share, and use your personal data, and how you can exercise your privacy rights.

We will only process personal data when we have a specific purpose, and we only keep and use your personal data to the extent necessary to run our business and according to current law. We have implemented the necessary security measures considering the nature, scope, and context of the processing of your personal data. We continuously strive to monitor our security measures and make improvements when needed to protect your personal data from unauthorized access, destruction, or loss.

When you are asked to provide personal data, you may decline. But if you choose not to provide personal data that is necessary for us to provide a requested service, we may not be able to provide you that service.

If you submit any personal data relating to someone else, you represent that you have the authority to do so and to permit us to use the personal data in accordance with this privacy policy.

Minors under the age of 18 are not intended to use this website.

If you have any questions or requests concerning our processing of your personal data, please contact us on the address below.

Data Controller: Ascelia Pharma AB. Company Reg. No. 556571-8797. Hyllie Boulevard 34, 215 32 Malmö, Sweden. E-mail: dataprivacy@ascelia.com.

Scope

On the following pages we will explain how we process your personal data and explain your rights in relation to the personal data processed by us in these activities:

- Use of website, contact e-mails and press releases
- Contract and vendor management
- Job applicant
- Engagements with healthcare professionals, healthcare organizations and other stakeholders
- Patients, patient organizations and caregivers
- Clinical trials
- Safety reporting / product safety
- Corporate governance
- Marketing
- Social media

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1 Abbreviations and definition of terms

Abbreviation/term	Definition
Employee	All directors, officers, employees, contractors, and temporary staff of the Company
CV	<i>curriculum vitae</i>
EU	European Union
EEA	European Economic Area
GDPR	general data protection regulation

2 Roles/functions and responsibility

Role/function	Responsibility
Clinical operations	Ensure compliance for handling of personal data in clinical studies according to Section 3.6 .
Corporate communication	Ensure compliance for handling of personal data for users of website, contact e-mails and press releases according to Section 3.1 . Ensure compliance for handling of personal data during management of social media according to Section 3.10
Finance	Ensure compliance for handling of personal data for contract and vendor management according to Section 3.2 . Ensure compliance for handling of personal data during management of corporate governance tasks according to Section 3.8 .
Marketing	Ensure compliance for handling of personal data during management of marketing activities according to Section 3.9 .
Medical affairs	Ensure compliance for handling of personal data in engagements with healthcare professionals, health care organizations and other stakeholders according to Section 3.4 .
People and organization (HR)	Ensure compliance for handling of personal data for job applicants according to Section 3.3 .
Pharmacovigilance	Ensure compliance for handling of personal data during management of safety reporting and product safety according to Section 3.7 .
Value and access	Ensure compliance for handling of personal data in engagements with patients, patient organizations and caregivers according to Section 3.5 .

3 Policy

3.1 Use of website, contact e-mails and press releases

This section explains how we process your personal data in our administration of our corporate website; www.Ascelia.com.

3.1.1 Use of personal data

We may use your personal data for the following purposes:

- To answer your inquiries requested via our official e-mail e.g. info@ascelia.com, partnership@ascelia.com or medical@ascelia.com. These e-mail accounts are regularly monitored, and your personal data is collected only to the extent necessary to reply. If the recipient of your e-mail is unable to answer your question, your e-mail will be forwarded to the relevant person.
- To provide you with our press releases.
- For statistical purposes in a de-identified manner.
- To collect information about your visit to our website by use of cookies.

3.1.2 Categories of personal data

We may collect the following categories of personal data about you:

Name, address, email address, telephone number, IP-addresses, and other personal data you provide in your e-mail.

3.1.3 Sources

We collect the personal data that you provide in the e-mail directly from you and we may collect personal data by the cookies we place on your device.

3.1.4 Legal basis

We process your personal data on the following legal basis:

Art. 6 (1)(f) of the GDPR – Legitimate Interest. This means that the processing of your personal data is necessary for the purposes of the legitimate interests pursued by us when making our website functionalities available to you and for us to be able to provide you with our press releases, the answers requested in e-mails and or when contacting us by e-mail.

3.1.5 Sharing of your personal data

We may share your personal data with our affiliates or service providers contracted to complete certain tasks within this policy, such as the distribution of our press releases.

3.1.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.1.7 Retention of your personal data

We will retain your personal data according to the specific purpose depending on your request and your use of our website. However, we will never keep your personal data longer than required by applicable law. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of personal data, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

3.1.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.2 Contract and vendor management

This section explains how we process your personal data when administering our contracts.

3.2.1 Use of personal data

We may use your personal data for the following purposes:

To maintain a working relationship with you and/or your employer.

3.2.2 Categories of personal data

We may collect the following categories of personal data about you:

Name, contact information, CV, employer, title, job role, billing information, TAX ID, contract terms, training certificates, etc.

3.2.3 Sources

We collect the information directly from your employer, you or from the contracts we enter into with your employer or with you.

3.2.4 Legal basis

We process your personal data on the following legal basis:

Art. 6(1)(b) of the GDPR – Performance of Contract. Personal data will be collected to perform the contract.

Art. 6 (1)(f) - Legitimate Interests. This means that the processing of your personal data is necessary for the purposes of the legitimate interests pursued by us in relation to our on-going business relation and this is not to perform the contract.

3.2.5 Sharing of your personal data

We may share your personal data with our affiliates, public authorities, suppliers, and vendors that assist us.

3.2.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.2.7 Retention of your personal data

Personal data will be retained for as long as necessary. We may keep your personal data for up to 30 years to fulfil legal requirements, such as bookkeeping, GxP documentation, etc.

3.2.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.3 Job applicant

This section explains how we process your personal data in connection with the recruitment process, including the receipt of unsolicited applications for future job opportunities.

3.3.1 Use of personal data

We may use your personal data for the following purposes:

- To assess your qualifications and skills and compare your profile with the current job offering and any potential vacancies and future job opportunities within Ascelia Pharma.
- To communicate the recruitment process of Ascelia Pharma to you.
- To contact you.

3.3.2 Categories of personal data

When applying, you decide which personal data to share with us. We may process the following personal data about you as an applicant:

Name, e-mail and other contact details, telephone number, motivation, CV.

You should only include information relevant for the review of your application. You should not include information about your race or ethnic origin, religion or belief, political opinion, sexual orientation, or union membership. Please do not provide your personal identification number/social security number and/or copies of identification papers together with your application, unless we explicitly ask for this.

3.3.3 Sources

We collect personal data directly from you, from your references, from recruitment agencies and if you apply through LinkedIn or another online recruitment platform, we also collect personal data from these.

3.3.4 Legal basis

We process your personal data on the following legal basis:

Art. 6 (1)(f) of the GDPR – Legitimate Interest. This means that the processing of your personal data is necessary for the purposes of the legitimate interests pursued by us when assessing your application for a job opportunity.

Art. 6(1)(b) of the GDPR – Performance of Contract. If you have a working relationship with us such relationship is confirmed in writing and personal data will be collected to perform the contract.

Art. 6(1)(a) of the GDPR – Consent. In certain situations, we also ask for your consent to process your personal data, e.g., if we need to process your personal identification number /social security number, if such information is not a legal obligation.

3.3.5 Sharing of your personal data

We will only share your personal data with third parties that are involved in the recruitment process (e.g., recruitment agencies) or if such third parties are needed for the preparation and issuing of your employment contract.

3.3.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.3.7 Retention of your personal data

We store your personal data no longer than strictly necessary to achieve the objectives for which your personal data is collected. This means that personal data of applicants for a job offering will be kept until the recruitment process is completed and for a further 12 months to document the fairness of the recruitment process. If you consent, we may keep your data for up to two years or until consent is revoked.

If you are employed, your personal data will be transferred to your personnel file as an employee of Ascelia Pharma.

Personal data provided in connection with an unsolicited application will be kept for a period of up to 12 months from its receipt to match it with new openings. Hereinafter the personal data will be properly deleted from our systems.

3.3.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.4 Engagements with healthcare professionals, healthcare organizations, and other stakeholders

This section explains how we process your personal data when you have an engagement with us or otherwise interact with us.

3.4.1 Use of personal data

We may use your personal data for the following purposes:

- To provide, collect, review, and communicate information on the proper use of drugs, medical devices, drug samples, and other goods and products handled by us (hereinafter referred to collectively as "Products").
- To provide, collect, review, and communicate information on quality, safety, or effectiveness of Products.
- To interact and collaborate with you based on your professional expertise when we have a contractual relationship with you.
- To provide, collect, review, and communicate healthcare-related information.
- To report on the occurrence of adverse effect, accident, or recall of Products.
- To check, review and take reasonable actions to requests for information and inquiry.
- To conduct research of delivery destinations, actual use, and user's needs of Products.
- To request and implement clinical studies, post marketing surveillance study and other studies.
- To handle complaints about our products and services.
- To cultivate better communication among Healthcare Professionals.
- To make notifications and reports to government and other public offices and agencies.
- To contact Healthcare Professionals regarding the above tasks.

3.4.2 Categories of personal data

We may collect the following categories of personal data about you:

Name, address, email address, telephone number, employer, CV, title, occupation, affiliation, professional qualifications, and scientific activities (such as previous clinical study experience, and participation in past or pending research studies with Ascelia Pharma and other companies), transfer of value, professional license information and contract information including billing information.

3.4.3 Sources

We collect the personal data directly from you or from:

- Documents or forms that you provide to participate in our sponsored or supported initiatives, such as sponsored clinical research and development activities, or in other contexts.
- Publicly available sources.
- CVs.
- Professional vendors.
- Your employer.
- Online and from other databases and websites, which may be managed by third parties on our behalf.

3.4.4 Legal basis

We process your personal data on the following legal basis:

Art. 6 (1)(f) of the GDPR – Legitimate Interest. This means that the processing of your personal data is necessary for the purposes of the legitimate interests pursued by us when assessing the activity/services and legitimate business need, adherence to local law and industry standards, and assessing fair market value.

Art. 6(1)(b) of the GDPR – Performance of Contract. If you have a working relationship with us such relationship is confirmed in writing and personal data will be collected to perform the contract.

Art. 6(1)(a) of the GDPR – Consent. In certain situations, we also ask for your consent to process your personal data, e.g., for disclosure of transfer of value, if such disclosure is not a legal obligation.

Art. 6(1)(c) of the GDPR – Legal Obligation. For clinical studies we may also process your personal data in relation to adverse event reporting to live up to a legal obligation.

3.4.5 Sharing of your personal data

We may share your personal data with our affiliates, collaborative partners, authorities, and other Healthcare Professionals.

3.4.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.4.7 Retention of your personal data

We retain personal data where we have an ongoing legitimate business need to do so (e.g., to maintain our engagement with you).

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize it or, if this is not possible (e.g., because your personal data has been stored in back-up archives), we will securely store your personal data and isolate it from any further processing until deletion is possible.

3.4.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with an applicable national data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.5 Patients, patient organizations and caregivers

Ascelia Pharma engages with patients, patient organizations, and caregivers to gain knowledge and to provide support and education of these groups.

3.5.1 Use of personal data

We may use your personal data for the following purposes:

Engagement, support, and education.

3.5.2 Categories of personal data

Depending on the interaction we have with you, we may collect and process the following personal data:

- Name, contact information, personal opinions and preferences.
- Financial information.
- Health information.

3.5.3 Sources

We collect personal data directly from you or the organization you are part of.

3.5.4 Legal basis

We process your personal data on the following legal basis:

Art. 6 (1)(f) of the GDPR – Legitimate Interest. This means that the processing of your personal data is necessary for the purposes of the legitimate interests pursued by us to provide support and education.

Art. 6(1)(b) of the GDPR – Performance of Contract. If you have a working relationship with us such relationship is confirmed in writing and personal data will be collected to perform the contract.

Art. 9(2) (a) cf. Art. 6(1)(a) of the GDPR – Consent. We will always obtain your consent to process your health information.

3.5.5 Sharing of your personal data

We may share your personal data with our affiliates and business partners.

3.5.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.5.7 Retention of your personal data

We retain personal data where we have an ongoing legitimate business need to do so (e.g., to maintain our engagement with you).

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize it or, if this is not possible (e.g., because your personal data has been stored in back-up archives), we will securely store your personal data and isolate it from any further processing until deletion is possible.

3.5.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.6 Clinical studies

The protection of personal data is very important to us, and we are committed to protecting your rights as a study subject when processing your personal data as the sponsor of clinical studies.

In our informed consent form we provide study subjects participating in our clinical studies with relevant information about our use and processing of their personal data.

3.6.1 Use of personal data

We collect and use your personal data to conduct our clinical studies to investigate efficacy, safety etc. of our investigative products. If you are a participant in one of our clinical studies, you will be able to read more about the purpose of that specific clinical study in the informed consent form.

3.6.2 Categories of personal data

We may collect the following categories of personal data about you:

- Ordinary personal data: your sex, date of birth, body weight and height, unique ID, and initials.
- Special categories of data: medical history, current and past medications (prescription and/or over-the-counter medications) that you are taking, whether you are taking part in any research studies or using any other experimental therapies or treatments, your race and ethnicity, scans, blood samples, biopsies and, information about your use of the clinical study medicine, the effect it has on you, and its potential side effects.

As the sponsor of the clinical study, we will not know your name. A unique ID will be assigned to you and all personal data processed by us will be linked to that ID, i.e., we will only receive your personal data in pseudonymous form. Only the investigators and other health care professionals and staff involved at the provider or hospital participating in the clinical study will know your name.

3.6.3 Sources

We receive your pseudonymized personal data from the investigator as part of the clinical study.

3.6.4 Legal basis

We process your personal data on the following legal basis:

Art. 9 (2)(i) cf. Art 6(1)(f) of the GDPR – Legitimate Interest. We have a legitimate purpose in collecting and using your personal data for scientific research purposes as described above.

Art. 9(2)(i) cf. Art. (6)(1)(c) of the GDPR – Legal Obligation. The processing of your personal data is necessary for us to comply with a legal obligation to collect and report safety incidents to regulatory authorities.

Art. 9(2)(i) cf. Art. 6(1)(a) of the GDPR – Consent. In certain situations, we also ask for your consent to process your personal data, e.g., for disclosure to your general practitioner or for future use of your personal data.

3.6.5 Sharing of your personal data

We may share your personal data with other companies and organizations commissioned by us to conduct the clinical study. These companies and organizations may only use your personal data for the purposes described in the informed consent form and this Privacy Policy.

Furthermore, your personal data stored at the investigator may be accessed by our monitors and auditors and authorized employees of the regulatory authorities of your country of residence and other countries to verify that the clinical study is being conducted correctly and to analyze the personal data collected during the clinical study. All third parties are obligated to observe the rules

of professional confidentiality and will only use your personal data as described in the informed consent form.

We may also share your personal data with third parties to the extent required by law, for example if we are obligated to disclose your personal data to comply with any legal obligation or to establish, exercise or defend our legal rights. Your general practitioner may be informed of your participation in one of our clinical studies if you consent to such disclosure.

3.6.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.6.7 Retention of your personal data

Your personal data will be retained in accordance with regulatory requirements for clinical studies, i.e., up to 2 years after the last marketing application, which may be more than 25 years from collection of your personal data.

3.6.8 Your rights

Unless you are a clinical study participant and have been informed and/or consented to different rights, then in general, you have the following rights:

- You are entitled to request access to or rectification of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.

- When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.7 Safety reporting / product safety

This section explains how we process your personal data for safety reporting.

3.7.1 Use of personal data

We collect and use your personal data to report safety incidents to local and international authorities in accordance with applicable legislation. We may ask for your permission to contact your general practitioner.

3.7.2 Categories of personal data

We may collect the following categories of personal data about you:

Ordinary personal data: your name, contact information sex, date of birth, your general practitioner.

Special categories of data: medical history, current and past medications (prescription and/or over-the-counter medications) that you are taking, your race and ethnicity, information about your use of the medicine, the effect it has on you, and its potential side effects.

3.7.3 Sources

We receive your personal data directly from you, your caregiver, physician, or other reporter.

3.7.4 Legal basis

We process your personal data on the following legal basis:

Art. 9(2)(i) cf. Art. (6)(1)(c) of the GDPR – Legal Obligation. The processing of your personal data is necessary for us to comply with a legal obligation to collect and report safety incidents to regulatory authorities.

Art. 9(2)(i) cf. Art. 6(1)(a) of the GDPR – Consent. In certain situations, we also ask for your consent to process your personal data, e.g., for disclosure to your general practitioner or for future use of your personal data.

3.7.5 Sharing of your personal data

We may share your personal data with our affiliates, other companies and organizations working for us to collect and report the data. These companies and organizations may only use your personal data for the purposes described above. We will share your personal data with authorities to the extent required by law.

3.7.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.7.7 Retention of your personal data

Your personal data will be retained indefinitely in accordance with regulatory requirements.

3.7.8 Your rights

Unless you have been informed and/or consented to different rights, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.8 Corporate governance

This section explains how we process your personal data for corporate governance.

3.8.1 Use of personal data

We may use your personal data for the following purposes:

- If you are a board member, management and/or shareholder, we process your personal data for the purpose of making official registrations with public authorities.
- On webcast in a de-identified form for statistical purposes or in an identified form, if informed when you provide your personal information.

3.8.2 Categories of personal data

We may collect the following categories of personal data about you:

Board member/management /shareholders: Information about your name, address, place of birth and nationality; confirmation of identity in the form of a scanned copy of a passport, driver's license, health insurance card and/or a birth certificate.

Shareholder: If beneficial owners are not Swedish citizens or do not have permanent residence in Sweden, it may be necessary to collect additional data.

3.8.3 Sources

We collect personal data directly from you.

3.8.4 Legal basis

We process your personal data on the following legal basis:

Art. 6(1)(c) - Legal Obligation – we are obliged to collect and provide the personal data to authorities.

Art. 6 (1)(f) - Legitimate Interests - this means that the processing of your personal data is necessary for the purposes of the legitimate interests pursued by us in relation to corporate governance matters, including communicating with you and the relevant authorities.

3.8.5 Sharing of your personal data

We may share your personal data with our affiliates, public authorities, suppliers, and vendors that assist us, i.e., service providers, technical support, supply services, and financial institutions.

3.8.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.8.7 Retention of your personal data

Personal data will be retained for as long as necessary in accordance with legal requirements to retain such personal data. In general, we will not keep your data for more than current year plus five years after the expiry of the business relationship.

3.8.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.9 Marketing

This section explains how we process your personal data for marketing related purposes.

3.9.1 Use of personal data

We may use your personal data for the following purposes:

Personal data will be processed for marketing-related purposes, including sending relevant information regarding our products and services (direct marketing), and for targeting our communication with you. We will not send you direct marketing unless you have given your consent. You may revoke your consent at any time and discontinue the use of the service.

3.9.2 Categories of personal data

We may collect the following categories of personal data about you:

E-mail address, name, address, telephone number, profession, and workplace.

3.9.3 Sources

We collect personal data directly from you.

3.9.4 Legal basis

We process your personal data on the following legal basis:

Art. 6(1)(a) – Consent – we will ask for your explicit consent before sending you direct marketing and targeting our communication with you.

3.9.5 Sharing of your personal data

We may share your personal data with suppliers and vendors working for us.

3.9.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.9.7 Retention of your personal data

Personal data will be retained for as long as necessary to provide you with the given service. If you withdraw your consent, we will delete your personal data after 2 years.

3.9.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).

- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.

3.10 Social media

This section explains how we process your personal data collected on social media pages such as LinkedIn.

3.10.1 Use of personal data

We may use your personal data for the following purposes:

To administer our pages and communicate with users, including potential patients.

3.10.2 Categories of personal data

We may collect the following categories of personal data about you:

Information made public by you, including your name, e-mail address, profession, workplace, interests, pages you like or follow, preferences, friends, health information in the form of adverse events, racial or ethnic origin, political opinions, etc.

3.10.3 Sources

We collect personal data directly from you.

3.10.4 Legal basis

We process your personal data on the following legal basis:

Art. 6(1)(f) - Legitimate Interest - this means that the processing of your personal data is necessary for the purposes of the legitimate interests pursued by us in relation to our communication with you.

Art. 9(2)(e) - Information manifestly made public by you.

3.10.5 Sharing of your personal data

We may share your personal data with our affiliates, suppliers, vendors working for us, and public authorities.

3.10.6 Transfers to countries outside the EU/EEA

Your personal data may be transferred within the EEA or to countries outside the EEA, that are not deemed to provide an adequate level of protection of your personal data compared to the EEA. In such cases we have provided appropriate safeguards as required by GDPR art. 49(1) through EU standard contractual clauses.

You may obtain a copy of the EU standard contractual clauses by contacting us as set forth above.

3.10.7 Retention of your personal data

Personal data will be retained for as long as necessary for handling your requests on social media, answering your enquiries, or to undertake marketing-related initiatives on the basis of the information provided by you on social media.

3.10.8 Your rights

In general, you have the following rights:

- You are entitled to request access to, rectification or erasure of your personal data.
- You are also entitled to oppose to the processing of your personal data and to request restriction of the processing of your personal data.
- If the processing of your personal data is based on your consent, you are entitled to revoke such consent at any time. Revocation of your consent will not affect the lawfulness of the processing carried out prior to your revocation of consent.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, for example the Swedish Authority for Privacy Protection.
- Further, you have a right to object to the following processing:
 - You have a right to object on grounds relating to your particular situation, at any time, to the processing of your personal data which is based on GDPR Art 6(1)(e) or Art. (6)(1)(f), including profiling based on those provisions.
 - When your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing.

You may exercise these rights by contacting us as stated above.