## **PRIVACY POLICY**

## 1 GENERAL

This Privacy Policy describes how Dilafor AB ("**the Company**" or "**Dilafor**") processes and uses personal data about you in your capacity as a subject in Clinical trials or representative of a company that is a partner of Dilafor. This Privacy Policy also details how Dilafor processes personal data about you in your capacity as a visitor to our website, <a href="www.dilafor.com">www.dilafor.com</a>, and in the event of you applying for a position at Dilafor (recruitment). This Privacy Policy also describes your rights and how you can exercise them in relation to Dilafor.

You should always feel secure when providing Dilafor with your personal data. Dilafor's aim, through this Privacy Policy, is to show how the Company ensures that your personal data are processed in accordance with applicable legislation. Dilafor defends your personal integrity and endeavours to protect the personal data of registered persons in a secure manner.

## 2 PERSONAL DATA CONTROLLER AND DATA PROTECTION OFFICER

Dilafor AB, company registration number 556642-1045, of Fogdevreten 2 A, SE-171 65 Solna, Sweden is the Personal Data Controller for the processing of your personal data and is, therefore, responsible for ensuring that your data are processed correctly and securely and in accordance with applicable legislation.

Dilafor has appointed Hanna Ersson to the position of Data Protection Officer ("**Data Protection Officer**"). The Data Protection Officer is tasked with, amongst other things, monitoring the processing of data by the Personal Data Controller to ensure that it is conducted in accordance with applicable legislation. The Data Protection Officer's contact details are: dpo@dilafor.com.

# 3 WHAT PERSONAL DATA DO YOU COLLECT?

Dilafor collects and stores information on you, in your capacity as a Clinical trial subject information we need both to enable you to undergo clinical trials and to enable Dilafor to access the results of the trial and to use these results in Dilafor's research and development of pharmaceuticals. This information includes your age, gender, ethnicity, health data, results of examinations and samples taken during the clinical trial, etc. Your personal data in the form of your name, postal address, and telephone number, are collected from your doctor at the clinic where you are treated within the framework of the trial. The data are stored in the hospital's records system and will not be forwarded to Dilafor.

## Representatives of companies/organisations

Dilafor collects and stores information about you that we need to enable us to contact you in your capacity of a representative of a company/organisation, such as your name, position, postal address, email address, and telephone number. We also, where relevant, collect personal data in the form of information that you provide in conjunction with meetings or events, e.g. the need for accessible premises, or food and drink preferences. Your personal data are also collected in conjunction with email correspondence between you and Dilafor. Your personal data are usually collected from the company/organisation

PRIVACY POLICY DILAFOR 2020-10-15

1

that you represent, but is also, where relevant, collected directly from you. Dilafor may also obtain your personal data from Dilafor's other partners. The Company also makes use of external information services in order, when necessary, to complement existing information with information about your position or how to contact you.

### Visitors to the website

The Company collects information about you and how you use our website (<a href="www.dilafor.com">www.dilafor.com</a>) that we need to enable us to improve, enhance the efficiency of, simplify, and develop our website, such as your IP address, MAC address, cookies, web browser, your equipment's/unit's operating system, and other types of technical information (equipment/unit information). Such data collection occurs in conjunction with your visits to our website.

### Recruitment

The Company collects information on you that we need in order to be able to recruit the right people to positions within the Company. Personal data collected for recruitment purposes comprises your name, postal address, email address, telephone number, CV, any presentation image, and other personal data with which you have chosen to provide us. We also collect your personal data in conjunction with email correspondence between you and Dilafor.

## 4 DILAFOR'S PROCESSING OF YOUR PERSONAL DATA

# 4.1 For experimental subjects

The personal data we collect, the purposes for which we intend to process your personal data, and the lawful basis for each type of processing, are shown in the table below.

Personal data categories	Purpose of the processing	Lawful basis
Personal data such as date of birth and details of health data and other medical information from before and during treatment as part of a clinical trial, such as previous and current conditions, results of examinations and samples taken, etc.	To conduct research and develop pharmaceuticals. Individual data are saved to verify research findings.	In accordance with your informed consent
Details of race and ethnicity	To conduct research and develop pharmaceuticals. Individual data are saved to verify research findings.	In accordance with your informed consent.

## 4.2 For representatives of companies/organisations

The personal data we collect, the purposes for which we intend to process your personal data, and the lawful basis for each type of processing, are shown in the table below.

Personal data categories	Purpose of the processing	Lawful basis
Personal data and contact information, such as name, address, telephone number, email address, job title, etc.	To enable the administration of the relationship with you or the company/organisation you represent.	The processing is necessary due to Dilafor's legitimate interest in fulfilling the agreement with the company/organisation that you represent, and in order to enable the administration of the relationship with you or the company/organisation you represent (balance of interests).
Personal data and contact information, such as name, address, telephone number, email address, job title, CV etc.	To comply with statutory requirements, e.g. handling of regulatory, security, and bookkeeping requirements.	The processing is necessary to comply with the Company's legal obligations.
Personal data and contact information, such as name, address, telephone number, email address, job title, etc.	To enable marketing and communication regarding the progress of Dilafor's research and development, in order to promote collaborations and other commercial relationships.	The processing is necessary to Dilafor's legitimate interest in marketing its research and development to you or the company/organisation that you represent (balance of interests).

# 4.3 For visitors to our website

The personal data we collect, the purposes for which we intend to process your personal data, and the lawful basis for each type of processing, are shown in the table below.

Personal data categories	Purpose of the processing	Lawful basis
Equipment/unit information, such as IP address, MAC address, information for cookies etc.	To enable the development of our website (www.dilafor.com) to bring it more in line with the way our website is used.	The processing is necessary due to the Company's legitimate interest in improving, enhancing the efficiency of, simplifying, and developing its website, attracting more partners, and publishing progress information with regard to the Company's

PRIVACY POLICY DILAFOR 2020-10-15

3

research (balance of interests).

# 4.4 For those applying for jobs at Dilafor

The personal data we collect, the purposes for which we intend to process your personal data, and the lawful basis for each type of processing, are shown in the table below.

Personal data categories	Purpose of the processing	Lawful basis
Personal data and contact information, such as name, address, telephone address, email address, CV, and other personal data with which you choose to provide us.	In order to enable us, in conjunction with recruitment, to determine who is best suited for a position and to ensure that the person in question has the requisite competence.	The processing is necessary due to the Company's legitimate interest in employing the right personnel and ensuring that competent individuals work for the Company (balance of interests).

## 5 STORAGE PERIOD

Dilafor will not store your personal data for a period that is longer than that required to fulfil the purposes for which the data were collected, or for the period for which Dilafor has a statutory obligation to store your personal data, or to protect Dilafor's legal interests, e.g. while legal proceedings are in progress. Your data will then be deleted.

Some personal data will, in order to comply with relevant bookkeeping legislation, be saved for seven years from the end of the calendar year when the financial year to which the information relates came to an end.

Contact details for company representatives will be stored for the period for which, in the opinion of the Company, the data are necessary to the maintenance of the relationship with the company/the organisation. Deletion will occur at such time as the Company is made aware that the data are no longer adequate or relevant for the purpose, or at the request of the contact persons.

Contact details and CVs from clinic employees participating in clinical trials, together with research findings, details of health data, and other information obtained from treatment during clinical trials, will be saved for at least 15 years from the completion of the trial, in order to verify research findings and to comply with regulatory and statutory requirements.

### 6 PROTECTION OF YOUR PERSONAL DATA

Dilafor has implemented the security measures required to protect your personal data from unauthorised access, alteration, and deletion to ensure that you feel secure when providing us with your personal data.

The security measures that Dilafor has taken to protect Clinical trial subjects personal data include pseudonymising names and civic ID numbers (i.e. replacing names and civic ID numbers with a special code number), restricting access to personal data by means of user permissions, and encrypting certain personal data, individual study data, and research findings, etc.

PRIVACY POLICY DILAFOR 2020-10-15

Dilafor will only disclose personal data on Clinical trial subjects at group level and will not otherwise disclose your personal data to any other party, other than as specifically permitted by this Privacy Policy (see section below).

# 7 TRANSFER OF PERSONAL DATA TO THIRD PARTIES AND THIRD-PARTY COUNTRIES

Dilafor does not disclose personal data to third parties other than in situations where such disclosure is a requirement that derives from a statutory obligation or in order to fulfil Dilafor's partnerships with clinics and physicians for the conduct of clinical trials. Your personal data will not be transferred or sold to third parties for advertising purposes. The following table sets out the situations in which your personal data may be disclosed to a third party.

Third party	Reason why personal data are disclosed to a third party
Cloud service providers	Dilafor stores certain information in cloud services and your personal data may, therefore, be disclosed to providers of such cloud services.
Suppliers and partners	Dilafor may disclose your personal data to our various operating suppliers. This will occur when the suppliers or partners need your personal data in order to fulfil their engagements on behalf of Dilafor.
Authorities	Personal data may be transferred to authorities (including foreign authorities) when this is required to comply with statutory obligations. The results of clinical trials will only be disclosed to authorities at group level.

Dilafor endeavours to process your personal data within the EU/EEA. Dilafor will not transfer your personal data to a country outside the EU/EEA other than as provided below. If personal data are transferred to a country outside the EU/EEA, Dilafor will take steps to ensure that your personal data continue to be protected and will also implement the measures required to ensure that personal data are transferred to countries outside the EU/EEA in a legal manner.

Dilafor uses IT providers with servers in the USA for data storage. Dilafor's use of such IT providers' services may result in your personal data being transferred to the USA. Dilafor has ensured that your rights are guaranteed in conjunction with data transfer to the USA by entering into agreements containing the European Commission's standard contractual clauses with these IT providers, or by ensuring the presence of other appropriate security measures.

## **8 YOUR RIGHTS**

You are, on condition that Dilafor is the Personal Data Controller, entitled at any time, free of charge, to obtain an extract from the register containing details of your registered personal data, together with information on the purpose of the processing of these data, where these personal data were obtained, and the recipients to whom the data has been or will be disclosed. You are also entitled, in the register extract, to obtain information on the predicted period for which the data will be stored and the criteria used to determine this period. Requests for such information shall be submitted in writing and sent to Dilafor at the address shown below under the "Contact" heading.

PRIVACY POLICY DILAFOR 2020-10-15

You are entitled to data portability, i.e. you have the right, under certain circumstances, to retrieve and transfer your personal data in a structured, commonly used, and machine-readable format to another Personal Data Controller.

Dilafor will, at your request, or on its own initiative, correct, anonymise, complement, or delete data found to be incorrect, incomplete, or misleading. Dilafor is, under certain circumstances, obliged to process your personal data despite you having requested its removal.

You can, under certain circumstances, request restrictions on the ongoing processing of your personal data (if, for example, you dispute the correctness of the personal data or whether their processing is legal) and are, furthermore, entitled to object to the processing under the conditions permitted by applicable personal data legislation.

If you wish to exercise any of the above rights or if you have any questions about personal data held by Dilafor, or about this Privacy Policy, please do not hesitate to contact Dilafor (see contact details below under the "Contact" heading).

Please contact Dilafor if you are dissatisfied with Dilafor's processing of your personal data, at which time Dilafor will do its best to address your complaints. Your integrity is very important to Dilafor and Dilafor endeavours at all times to protect your personal data in a relevant and secure way. If you believe that Dilafor has, nonetheless, failed to live up to this ambition, you are also entitled to submit a complaint to the Swedish Data Protection Authority.

### 9 COOKIES

Dilafor uses cookie-like techniques in order to provide certain functions on the <a href="https://www.dilafor.com">www.dilafor.com</a> website, in order to improve the website and to provide a better and more personal service. The information is stored in the form of a file containing encrypted login data and is used to remember any website settings selected and to analyse the use of the website.

## 10 LINKS TO OTHER WEBSITES

Dilafor's website, <a href="www.dilafor.com">www.dilafor.com</a>, may include links to external websites over which Dilafor has no controlling influence. These websites are not covered by this Privacy Policy. Dilafor accepts no responsibility whatsoever for the content of the websites linked to from <a href="www.dilafor.com">www.dilafor.com</a>.

## 11 AMENDMENTS

Dilafor is entitled to amend this Privacy Policy at any time. Dilafor will, in conjunction with any amendments to this Privacy Policy, publish the amended Privacy Policy on the <a href="https://www.dilafor.com">www.dilafor.com</a> website, together with details of when the amendments come into force, and will inform Clinical trial subjects and partners in an appropriate manner.

## 12 CONTACT

If you have any questions about how Dilafor processes your personal data or wish to exercise your rights, contact Dilafor by email at <a href="mailto:dpo@dilafor.com">dpo@dilafor.com</a>, or by letter in the post to Dilafor AB, Fogdevreten 2 A, SE-171 65 Solna, Sweden.

PRIVACY POLICY DILAFOR 2020-10-15