

## **PRIVACY POLICY**

### **Active Biotech AB (publ)**

#### **About Active Biotech AB and this privacy policy**

**Active Biotech AB** (publ), Reg. No. 556223-9227, Scheelevägen 22, 223 63 Lund ("Active Biotech" or "we") takes all necessary measures to make sure that personal data concerning visitors to our website, our shareholders, contact persons for our suppliers and business partners as well as other concerned parties is being processed by us in a lawful, fair and transparent manner.

Active Biotech is the data controller of your personal data and processes it in accordance with this privacy policy. This privacy policy explains and clarifies your rights in relation to Active Biotech regarding the processing of your personal data and how you can exercise those rights.

We are committed to protecting your personal data and it is important to Active Biotech to ensure that your personal data is being processed in a secure way. We comply with all applicable laws and rules that exist to protect the privacy of individuals, including laws and regulations which implement or complement the EU Data Protection Directive 95/46/EC, the Electronic Communications Directive 2002/58/EC and the EU General Data Protection Regulation 2016/679 (GDPR) and any changes to, amendments to or regulations that replace such laws and regulations.

Some pages on our website contain links to third party websites. These websites have their own privacy policies and Active Biotech is not responsible for their operations or their information policies. Hence, any user who sends information to or through such third party websites should review the privacy policies posted on those websites before any personal data is transferred to them.

For information on how Active Biotech collects, handles and stores information obtained through cookies, see our separate Cookie Policy, [read more here](#).

#### **Collection of your personal data**

We may collect your personal data from the following sources:

- Active Biotech's **website**, e.g. when you subscribe to any of our press releases, contact us through the website, apply for one of our advertised employments or submit a spontaneous job application.
- when you contact us by **email or phone**;

- by **agreement, invoice or other business contact**, if you act as contact person for any of our business partners; and/or
- from **third parties**, e.g. our business partners in our clinical studies or securities register centres in connection to when you trade shares in Active Biotech.

The types of personal data that we collect may, depending on the context, include:

- name and contact information including address, mobile number and email address;
- shareholding;
- application documents such as your resume and cover letter;
- user-generated information that you choose to share through our website; and

The types of personal data that we collect if you are a participant in our clinical studies or third party clinical studies:

- study ID, health information and genomic information

### **Why do we process your personal data?**

Active Biotech may use your personal data for the following purposes, based on the legal grounds as set out below.

- **Performance of a contract:** For the execution of recruitment procedures as well as for managing your subscription to our press releases.
- **Compliance with a legal obligation:** Active Biotech is subject to a legal obligation to hold a share register in which shareholders' names and shareholdings are listed. Furthermore, we save invoice documentation and application documents in accordance with applicable laws and regulations.
- **Legitimate interest:** In order to be able to communicate with you by email and to keep contact with our business partners and other contracting parties. In addition, personal data regarding participants in our clinical studies is processed in order for us to carry out the specific clinical study. We also process personal data in relation to older studies carried out by third parties for research purposes.
- **Consent:** to provide you with information regarding our press releases

### **Retention of personal data**

Active Biotech takes all reasonable steps to ensure that your personal data is processed and stored securely. Your personal data will never be stored longer than permitted by applicable law or longer than necessary to fulfil the above stated purposes. Your personal data will be processed by us

during the time periods set out below. By the end of such periods, we will delete your personal data.

- **Contact person:** Your personal data will be stored as long as you are listed as contact person for any of our business partners or any other contracting party to Active Biotech.
- **Communication:** If you contact Active Biotech, e.g. by email, your personal data will be stored for as long as necessary in order to complete the contact with you. Regarding your subscription to our press releases, your personal data will be stored up to and including the time you decide to end your subscription.
- **Job applicants:** Active Biotech will store your application documents, including your resume, cover letter and photo during the recruitment procedure and for a subsequent period of two years, in order for us to defend ourselves against potential legal claims.
- **Legal obligation:** Active Biotech saves documentation which constitute accounting information in accordance with applicable laws and regulations. Information about shareholders is saved in accordance with Active Biotech's legal obligation to keep a share register.
- **Participants in clinical studies:** In the event that you choose to participate in our clinical studies, we will process your personal data for the duration of the clinical study as well as in connection with the potential subsequent publishing of the results of the study, as further described in the information you receive when you consent to participate in the study. Furthermore, Active Biotech has a legal obligation to archive the clinical trial master file, including the personal data of study subjects, for 25 years.
- **Consent:** In the event that we process your personal data based on your consent, we only save your personal data for as long as we still have your consent.

### **Transfer of personal data**

Active Biotech always observes great caution when transferring your personal data and your personal data is only transferred in accordance with this privacy policy and after taking appropriate security measures. We only transfer personal data in accordance with the information set out below.

- **Business partners to Active Biotech:** As a participant in our clinical studies, your personal data will be transferred between Active Biotech and our business partners, which we use for carrying out our clinical studies.
- **Business transactions:** If all or part of Active Biotech's operations are sold or integrated with any other business, operation or company, your personal data may be disclosed to our advisors, potential buyers and their advisors, and be transferred to the new owners of the operation.

- **Legal obligations:** Your personal data may also be disclosed for the purpose of Active Biotech's compliance with certain legal obligations and it may be transferred to relevant public authorities when permitted and required by law.

Active Biotech does not transfer personal data to recipients in countries outside the EU/EEA and we do not sell your personal data. However, if you agree to participate in any of our clinical studies, your personal data may be transferred to recipients in countries outside the EU/EEA. When transferring personal data to such third countries, Active Biotech will take all appropriate measures to ensure that your personal data is being processed in a secure way and in accordance with this Privacy policy. Active Biotech will ensure that appropriate protective measures are taken by securing that at least one of the following conditions are met:

- the EU Commission has decided that the third country ensures an adequate level of protection;
- the data subject has given his/her consent to the transfer;
- there is legal support for the transfer in applicable personal data legislation;
- an agreement containing the EU Commission Model Clauses (2010/87/EU) has been concluded without amendments or additions that violate such clauses.

### **Withdrawal of consent**

In the event that we obtain your consent when you choose to participate in our clinical studies, it is important that you are aware of your right to withdraw your consent at any time. You may withdraw your consent by contacting the responsible physician for the study, according to the contact details provided in the information you receive when you consent to participating in the study. Such withdrawal may be made in whole or in part.

### **Your rights**

You have the right to request information about what personal data concerning you that we are processing and how it is being used by contacting us in writing at the contact details provided below. You are also entitled to request correction of incorrect, incomplete or ambiguous personal data concerning you by contacting us. For the protection of your privacy and your personal data, we may require that you identify yourself in connection with our assistance.

In accordance with applicable data protection laws, you also have the right to request that your personal data shall be erased or that the processing of your personal data shall be restricted. In certain situations, you also have the right to object to the processing of your personal data and request that your personal data must be transmitted in an electronic format.

When you participate in any of our clinical studies, we refer to the information you receive in conjunction with giving your consent to participating in the study. The information contains specific contact details for the relevant study.

You may file a complaint with the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*) if you believe that Active Biotech's processing of your personal data is not carried out in accordance with applicable laws.

### **Changes to the privacy policy**

Please note that the terms of the privacy policy may be changed or amended. Any new version will be published on Active Biotech's website. Consequently, you should review these terms on a regular basis to make sure that you are satisfied with the changes. In case of any material changes we will, however, email you, if you have given us your email address, to make you aware of any changes made.

### **Contact us**

If you have any questions related to this privacy policy, if you suspect that a breach of this privacy policy has occurred or if you would like to contact us for any reason stated in this privacy policy, please contact us at the contact details provided below.

#### **Active Biotech AB (publ)**

GDPR

Scheelevägen 22

223 63 Lund

[dataprotection@activebiotech.com](mailto:dataprotection@activebiotech.com)