

PRIVACY POLICY

Version 1.0 - 25 May 2018

This Privacy Policy has been established and is operated by Expres²ion Biotechnologies ApS ("Expres²ion", "we", "us" and/or "our"). In the following, we describe who we are, how to contact us, use of cookies and the principles that we apply in our processing of information about stakeholders.

Data Controller Identity & Contact Information:

- Expres²ion Biotechnologies ApS
- CVR. No. DK 3277 0487
- c/o SCION-DTU Science Park
- Agern Allé 1
- DK-2970 Hørsholm
- Tel.: +45 2222 1019
- E-mail: <u>info@expres2ionbio.com</u>
- www https://expres2ionbio.com/

If you have any questions about our processing of your information, you are always welcome to contact us using the above contact details. Considering that normal e-mail communication is not secure communication, please do not write anything in your e-mail that is private, sensitive or which should be protected.

Cookies:

Expres²ion uses cookies to register the kind of services our customers are interested in and to measure the traffic on our website. Information obtained is used to enhance our website, adjust our offers and increase our customer service. By using our homepage you accept our use of cookies.

Data Handling:

The information, which we process about you, may include:

General personal information, including

- identification information, including name, address, telephone number and e-mail
- identification of your employer
- your place of work, position and job function
- information that is included in our correspondence with you
- portrait photo and CV/bio
- personal ID-, e.g. passport), and vehicle registration Number, if you visit our premises
- biometric data in case of grant of access to restricted research and manufacturing areas
- payment transaction data if you are involved in a payment transaction involving us
- your affiliations with sponsors and customers (financial disclosure)
- your signature



Purpose and Legal basis

The purpose of our data processing is to manage our relations to our stakeholders, whether authorities, customers, vendors, shareholders or others, compliance with securities laws, protection of business secrets, maintenance and cultivation of our pipeline, development and rendering of services, as well as ongoing relations to co-operators. In addition general stakeholder information collected may be used for the purpose of analyzing co-operations and reports submitted.

Legal Basis for our Processing of your Personal Data:

- ➤ In the processing of personal data in connection with your visits to our facilities, use of our homepage, acquisition of products and services, participation in meetings, events and seminars as well as involvement in any payment transaction, the legal basis for our registration of information is Section 6(1) of the Danish Data Protection Act, cf. Article 6, paragraph (1) (b) of the Data Protection Regulation on processing which is necessary to conclude and/or execute a contract.
- ➤ When we register information that is required in accordance with Securities Acts, the Accounting Act or as a part of the reporting obligations to tax and regulatory authorities, auditors and inspectors, the legal basis is Section 6(1) of the Data Protection Act, cf. Article 6, paragraph (1) (c) of the Data Protection Regulation relating to processing, which is necessary in order to comply with a legal obligation vested in us.
- ➤ The legal basis for our collection and registration of other personal data is Section 6(1) of the Data Protection Act, cf. Article 6, paragraph (1) (f) of the Data Protection Regulation on processing, which is necessary for the purposes of the legitimate interests pursued by us or a third party, provided that such interests are not overridden by your interests or fundamental rights and freedoms in which case disclosure shall not take place.
- ➤ If a legal basis other than Section 6(1) of the Danish Data Protection Act, cf. Article 6, paragraph (1) (a) of the Data Protection Regulation (consent) does not apply, your data will not be retained.
- ➤ Disclosure of information about you may take place in compliance with the processing rules in the data protection legislation and other Danish and EU legislation. In each case, we will assess whether the disclosure requires your explicit consent or whether the disclosure may take place on another legal basis.
- ➤ We do not disclose stakeholder information to other companies, but in cases where Expres2ion such other company collaborates with us on a project involving you or your employer, in which case contact details such as name, position, e-mail, telephone and work place may be shared with the partner in view of promoting the project.
- ➤ We comply with regulatory requirements relating to execution of specific procedures required for the purpose of, e.g., enabling you to make a complaint relating to our processing of your data.

Categories of Recipients

We disclose or hand over personal information to the following categories of recipients:

- > Bankers in connection with the administration of payments
- > Tax authorities and other authorities in connection with statutory reports
- Securities and Exhange Commissions
- > Other stakeholders involved in a co-operation with us and your employer
- > Our data processors on the basis of Data Processing Agreements.



Right to Erasure ('Right to be Forgotten')

Expres2ion's products comprise services related to research and development of medicinal products as well as intermediates and active ingredients developed by Expres2ion for incorporation in medicinal products that will be manufactured and marketed for a number of years. In order to ensure the proper handling of product liability, insurance and warranty claims and to be able to live up to our obligations and to enable the efficient rendering of services , we retain information until the 4th 31 December following elapse of the period during which products incorporating active substances supplied by us and/or developed by third parties incorporating services rendered by and technologies vested in Expres2ion, which term may be prolonged if requested by stakeholders, e.g. for auditing purposes.

Your Rights

You have a number of rights in relation to our processing of information about you. You can exercise your personal data rights by contacting us. You will find our contact details at the top of this Privacy Policy. When you have requested access to information about yourself, to get it corrected or erased or if you have objected to our data processing, we will investigate to see if it is possible to accommodate your wish. We will respond to your inquiry as quickly as possible and no later than one month after we have received your inquiry. You have a:

- > Right of access. You have the right to access the information that we process about you.
- ➤ Right of rectification (correction). If you believe that the personal data, which we process about you, is inaccurate, you have the right to have it corrected. You must contact us and tell us where the inaccuracies are to be found and how they can be corrected. We will in each instance decide whether or not we believe your request is justified and will act accordingly. When you contact us with a request to have your personal data corrected or erased, we will investigate whether the conditions have been met, and if so, we will implement changes or the deletion as quickly as possible.
- ➤ Right to deletion. We generally delete personal data when it is no longer necessary for us to retain them. Under special circumstances, you have the right to have specific information about you deleted also prior to the time at which we normally delete data found to be obsolete. This applies, for example, if our retention of your data is based on consent only, if your data is no longer necessary for the purpose that the data was originally retained or if the purpose for retaining the data is no longer relevant. You may also contact us, if you believe that your personal data is processed in violation of the law or other legal obligations vested in us.
- ➤ Right to limitation of data processing. If you claim that information registered by us is wrong or inaccurate, you may request that we only process a minimum of data, until we have been able to determine if the data collected is correct. You may also request limitation instead of erasure, if you believe our processing of the information is illegal or if you believe that we no longer need the information for a legitimate purpose or if you believe your legitimate interests precede the legitimate interests of the data controller.
- ➤ Data Transfer Rights (data portability). On your request data provided by you and processed by us for the purpose of Expres²ion complying with a contract to which you or your employer is a party, will be sent to you or a recipient designated by you in a commonly used and machine-readable format.



- ➤ Right to object. You have the right to raise objections against our data processing. You may use the contact information at the top to send an objection. If your objection is justified, we will accommodate same as appropriate.
- ➤ Right to receive information about use of data for new purposes. If we want to use information about you for a purpose other than the purposes listed in this policy or separately communicated to you, you have the right to receive information about the intended use before use is made.
- ➤ Complaints. If you are dissatisfied with the way in which your personal information has been or is being processed or with our response to a request made by you or an objection filed by you, you may file a complaint with the Danish Data Protection Agency, see www.datatilsynet.dk, which will then decide upon the dispute.

Hørsholm, 25 May 2018

Steen Klysner CEO