

Expres2ion Biotech Holding AB  
20 June 2024

# Privacy Policy & Notice

VERSION 1.0

# Privacy policy & notice

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.

## 1. 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: [info@expres2ionbio.com](mailto:info@expres2ionbio.com)  
 Website: <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.

## 2. 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.



### 3. Data Handling:

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

General personal information, including:

- identification information, including name, address, telephone number and email
- identification of ExpreS2ion being your employer
- your place of work, position and job function
- information that is included in our correspondence with you
- portrait photos for ID card and homepage use, videos, social media presentations and CV/bio
- personal ID-, e.g. passport and CPR, numbers
- registration Numbers for vehicles used to visit our premises
- biometric data in case of grant of access to restricted research and manufacturing areas
- identification of any union and/or collective agreement relevant to the administration
- MUS procedure identified personal and professional development wishes and opportunities
- payment transaction data if you are involved in a payment transaction involving ExpreS2ion
- your affiliations with ExpreS2ion sponsors, investors and customers (financial disclosure)
- your signature

### 4. Processing Purpose

The purpose of our data processing is to sustain our clients' ability to carry out research and development activities and to uphold marketing authorizations / licenses for medicinal products or intermediates incorporating active substances supplied by us and/or developed by third parties incorporating services rendered by ExpreS2ion or by means of technologies operated by ExpreS2ion, ("Products"), and otherwise to manage our relations to our stakeholders, whether authorities, customers, vendors, shareholders, employees, 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.



## 5. Legal Basis for our Processing of your Personal Data:

### General:

- 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 – in prioritized order– §§ 12 (Employment Contract Administration), 11 (CPR Numbers) and 6 of the Danish Data Protection Act, cf. the GDPR Regulation (EU) No. 2016/679 (the “GDPR”), Article 6, paragraph (1) (b), conclusion of contracts, (c) legal obligation, (e) to address enquiries from competent authorities, (f) when Expres2ion’s interest in processing the data is considered to outweigh your interest in not having the data processed, or, if longer, (a) for the duration of any consent that you may have provided.

### Individual Processing Examples

- 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 GDPR 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 GDPR, 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 GDPR (consent) does not apply, your data will only be retained subject to Expres2ion having obtained your consent. Especially, portrait photos, videos and presentations comprising your photo will only be used on Expres2ion’s homepage, in marketing materials, in printed matters and other materials meant for third party addressees, subject to your consent having been obtained. If your consent is later withdrawn, or if your employment with Expres2ion ceases, the use will cease going forward. This means that printed matters of whatever nature already produced may be used until the stock is exhausted, whereas use of your photo on all dynamic platforms will be removed when the communication in question is next modified in the normal course of business procedure updating. Notwithstanding the former, please note that intranet use / phonebook use of your portrait, typically the photo used for your ID card, is considered authorized as per Article 6, paragraph (1) (f) of the GDPR (legitimate interest) without Expres2ion obtaining your specific consent, as such use is considered a helpful tool integrating all staff. However, also such use will cease upon termination of your employment.



- 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 workplace 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.

## 6. Categories of Recipients

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

- Regulatory authorities for Product licensing purposes (e.g. CV/bios shared with CRO's)
- Bankers and pension funds in connection with the administration of payments
- Tax authorities and other authorities in connection with statutory reports
- Securities and Exchange Commissions
- Other stakeholders involved in a co-operation with us and your employer
- Our data processors on the basis of Data Processing Agreements.

## 7. 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 several years. In order to sustain our clients' ability to develop and commercialize such commodities, to ensure the proper handling of Product related product liability, insurance and warranty claims and to be able to render our services effectively, your data may be retained until the 4th 31 December following elapse of the Product development or commercialization period, whichever is the longer, , which term may be prolonged if requested by stakeholders, e.g. for auditing purposes. If retention of your data is not relevant for the above listed purposes, retention will only take place for as long as retention is required for



Expres2ion to – in prioritized order – perform contracts to which you are a party, comply with a legal obligation to which Expres2ion is subject, protect your or other staff's vital interests, perform a task carried out in the public interest, protect our legitimate interests as pursued by us or, if longer, for the duration of any consent that you may have given.

## 8. 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 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](http://www.datatilsynet.dk), which will then decide upon the dispute.
- Portrait photos, videos and social media presentations: Use of photos, but for intranet use, is subject to you having given consent. The use will cease going forward if the consent is withdrawn.

Hørsholm, 20 June 2024

Bent U. Frandsen  
CEO

