



GDPR Policy

Information on how we process your personal data

1. Introduction

This GDPR Policy or Privacy Policy (the “**Policy**”) describes how Cyxone AB, reg. no. 559020-5471 (“**Cyxone**”, “**we**”, “**us**” or “**our**”), at the address Hyllie Boulevard 34, 215 32 Malmö, processes your personal data when you visit and use our website (e.g. patient or job applicant) or come into contact with us because of our business and services – usually because you represent a corporate customer, supplier or a partner of ours.

We are responsible for the processing of your personal data as described in the General Data Protection Regulation (GDPR) (Regulation (EU) No 2016/679 of the European Parliament and of the Council) in the capacity of data controller. If you would like to know more about our processing of your personal data, you are welcome to contact us through our data protection officer Mrs Gentiane Verstraeten at dpo@cyxone.com.

It is important to us that you feel comfortable with how we process your personal data, and we therefore ask you to read through this Policy, which we may update from time to time. If we make changes to the Policy, the new version will apply from the time it is published on our website <https://cyxone.com/>. At the top of the page, you can see when the Policy was last changed.

2. How we collect your personal data

The personal data we process relating to you is mainly collected from you when you visit and use our website or when we come into contact with you – e.g. via email, telephone or personal meetings, conferences, conventions or similar occasions. We may also collect your personal data from a third party, usually from the company you represent.

3. How we process your personal data

3.1 Introduction

We only process your personal data to the extent permitted in accordance with applicable data protection legislation. This means inter alia that we need to have a legal basis for the purposes for our processing your personal data implement appropriate security measures for the processing.

If you are a patient participating in a clinical trial sponsored by Cyxone, please see the information provided to you when consenting to participation in the study. In general Cyxone will only process your data in pseudonymized form. On occasions Cyxone’s employees or contractors working on behalf of Cyxone, may however access the patient’s personal data at the source of collection for the purpose of verifying data.



Processing of personal data attributable to you as contact person of a business partner:

Purposes of the processing

Contact and communication with you for the purposes of creating, maintaining and developing our business relationship with you or the company you represent.

This includes, among other things, communication via email regarding our business, services and current activities.

Categories of personal data

The personal data we process consist of:

- Name (first and surname)
- Contact details such as email address, telephone number, location and business address
- Professional title and information regarding the company you represent
- Information that you otherwise provide us in our communications with you.
- Internet protocol (IP) address

Legal basis: Legitimate interests, where our legitimate interest is to create and thereafter maintain and develop a business relationship with you or the company you represent.

Storage period: We store your personal data for a period of six (6) months after the data was collected. If a business relationship is established between us and you or the company you represent during this time.

Purposes of the processing

Contact and communication with you in your capacity as a representative of one of our existing customers, partners, suppliers or other business contacts, in order to maintain and develop our business relationship with you or the company you represent.

This includes, among other things, regular administration and communication regarding our customer, partner and supplier agreements and communication via email about our business, services and our current activities.

Categories of personal data

The personal data we process consist of:

- Name
- Contact details such as email address, telephone number, location and business address
- Professional title and information regarding the company you represent
- Information that you otherwise provide to us in our communication with you.
- Internet protocol (IP) address

Legal basis: Legitimate interest, where our legitimate interest is to maintain and develop our business relationship with you or the company you represent.

Storage period: We process and store your personal data for as long as we have a business relationship with you or the company you represent, but no longer than two (2) years

after the last time we were in contact in our business relationship except in case of clinical trials collaboration where timelines are defined in Clinical Trial Regulation EU 2014/536.

We may however need to store your personal data for a longer time for other purposes, e.g. if we need to take measures in order to establish, exercise or defend legal claims. We may also need to store your personal data for a longer time in order to fulfil our legal obligations, e.g. relating to book keeping according to the Swedish Accounting Act.

Purposes of the processing

Administration and communication in order to conclude or perform a contract between us and you or the company you represent.

This includes, among other things, invoicing and regular handling, following up and documentation of contract related matters.

Categories of personal data

The personal data we process consist of:

- Name
- Contact details such as email address, telephone number, location and business address
- Professional title and information regarding the company you represent
- Information that you provide to us in contract related matters with you or the company you represent, e.g. questions and feedback on contracted services.
- Internet protocol (IP) address

Legal basis: The processing is necessary to conclude and perform a contract with you or the company that you represent. If you are acting on behalf of someone else e.g. in the capacity of representative of a customer, partner or supplier to us, our processing is carried out based on our legitimate interests, where our legitimate interest is to conclude as well as perform the agreement with the company you represent.

Storage period: We process and store your personal data for as long as we have a business relationship with you or the company you represent, but no longer than two (2) after the last time we were in contact in our business relationship.

We may however need to store your personal data for a longer time for other purposes, e.g. if we need to take measures in order to establish, exercise or defend legal claims. We may also need to store your personal data for a longer time in order to fulfil our legal obligations, e.g. relating to book keeping according to the Swedish Accounting Act.



Processing of personal data attributable to you as doctor or investigator conducting clinical trial which Cyxone sponsors:

Purposes of the processing

To conduct clinical the trial and ensure that you have relevant knowledge.

Categories of personal data

The personal data we process consist of:

- Name
- Contact details such as email address, telephone number, location and business address
- Position
- Qualifications for managing the study
- CV
- Financial information

Legal basis: Fulfilment of legal obligations applicable to the clinical trial (i.e. Clinical Trial Regulation EU 2014/536).

Storage period: The information is retained during the time it is needed for us to fulfil our commitments and obligations as sponsor.

Processing of personal data attributable to you as job applicant:

Purposes of the processing

To facilitate and follow up on job applications.

Categories of personal data

The personal data we process consist of:

- Name
- Contact details such as email address, telephone number
- CV
- Cover letter

Legal basis: The processing is carried out based on our legitimate interests, where our legitimate interest is facilitating and following up on job applications. In case you wish not to apply for a specific position or wish to enable us to keep your application for future job openings, such processing is based on your consent.

Storage period: Personal data on job applicants is only kept for the term of the recruitment period or, if you have provided your consent to it, until the consent is withdrawn, but for a maximum of two years.

Processing of personal data attributable to you as a shareholder:

Purposes of the processing

To administer and fulfil legal requirements to keep and update our share register.

Legal basis: Fulfilment of legal obligations under the Swedish Companies act.

Storage period: The information is retained during the time it is needed for us to fulfil our commitments and obligations.

Categories of personal data

The personal data we process consist of:

- Name
- E-mail address

Processing of personal data attributable to you as person closely associated with a person discharging managerial responsibilities:

Purposes of the processing

To administer and fulfil legal requirements regarding inside information.

Legal basis: Fulfilment of legal obligations under the Market Abuse Regulation (EU) 569/2014

Storage period: The information is retained during the time it is needed for us to fulfil our commitments and obligations.

Categories of personal data

The personal data we process consist of:

- Name
- Position of the person you closely associated with

Processing of personal data attributable to you if you contact us through our website (www.cyxone.com)

Purposes of the processing

To respond to your query or your request for information.

Legal basis: The processing is carried out based on our legitimate interests, where our legitimate interest is to respond to respond to your query or your request for information.

Storage period: The information is retained during the time it is needed for us to respond to you and manage your matter.

Categories of personal data

The personal data we process consist of:

- Name
- E-mail address
- Any other personal data you submit to us in your contact

3.2 To fulfil legal obligations or to establish, exercise or defend legal claims

We may process your personal data in order to fulfil our legal obligations according to law or other statutes that we are subject to, or if we are subject to orders or decisions by courts or authorities, which require us to process your personal data.

We may also process your personal data so that you, or the company you represent, we ourselves, our any relevant third party can establish, exercise or defend its legal claims, e.g. in connection with an ongoing dispute.

4. How do we share your personal data?

Access to your personal data is limited to persons who require such access for the purposes described in Section 3 above. Your personal data may therefore be shared with the following categories of third party recipients:

- a) Companies within our group: We may share your personal data with other companies within our group. If we share your personal data with other companies within our group, we will ensure that the personal data continues to be processed in line with this Policy.
- b) Service providers and consultants: We use third party service providers to manage parts of our business operations. We may share personal data with such third parties in order for them to supply us with services, e.g. IT services or other administrative functions or provide services as sub-contractors in connection with our own services. When we use such service providers, we enter into data processing agreements and take other suitable measures to ensure that your personal data is processed in line with this Policy. For consultants, privacy and confidential obligations are regulated under the contractual agreement with the specific consultant.
- c) Our partners: We may from time to time cooperate with external parties in order to improve our services and business. Such parties either process your personal data as data controllers according to their own terms and policies for handling personal data, or as our data processors according to our instructions. In the latter case, we enter into data processing agreements and take other suitable measures to ensure that your personal data is processed in line with this Policy.
- d) Sale or transfer of business or assets: We may share your personal data with a buyer/investor or prospective buyer/investor in the event of a sale, assignment or other transfer of all or parts of our shares, assets or operations. Should such transfer occur, we will take actions in order to ensure that the receiving party processes your personal data in accordance with this Policy. The purpose of such sharing or processing of your personal data is to allow a (potential) buyer/investor to carry out an assessment of us as a company and, where necessary, take actions and make preparations in the event a sale, assignment or other transfer should occur, where such sharing or processing of your personal data is carried out with reference to the legitimate interests of allowing such assessment, actions and preparations by the (potential) buyer/investor.

- e) **Public authorities:** We may share your personal data with public authorities such as the Swedish Police or the Swedish Tax Agency when we are required to do so by e.g. applicable law or other legal statutes or orders or decisions by courts or authorities in order to fulfil the legal obligation specified therein. We are also sharing your personal data with regulatory authorities in order to fulfill our obligations as Sponsor in Clinical trials and/or drug development activities

5. Where we process your personal data

We strive to always process your personal data within the EU or EEA. However, we may transfer your personal data to service providers who, either themselves or by their sub-contractors, are located or have business activities in a country outside the EU or EEA. In such cases, we are responsible for ensuring that the transfer is made in accordance with applicable data protection legislation before it occurs, e.g. by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission, or by ensuring appropriate safeguards based on the use of standard contractual clauses that the European Commission has adopted and other appropriate measures to safeguard your rights and freedoms.

6. About cookies

We are not using any analytics or marketing cookies on our website.

7. Links to other websites

Our website or information channels may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over these other websites. Therefore, we are not responsible for the protection and privacy of any information which you provide whilst visiting such sites; and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the websites concerned.

8. Your rights

You have rights in relation to us and our processing of your personal data. Below, you will find information about your rights and how you can exercise them.

Please note that your rights apply to the extent that follows from applicable data protection legislation and that there may be exceptions to the rights where applicable. We also ask you to note that we may need more information from you in order to e.g. confirm your identity before proceeding with your request to exercise your rights.

To exercise your rights or request information about them we ask that you contact us, which is most easily done via email: dpo@cyxone.com.

8.1 Right of access

You have the right to obtain a confirmation as to whether or not we process your personal data. If that is the case, you also have the right to receive copies of the personal data concerning you that we process as well as additional information about the processing, such as for what purposes the processing occurs, relevant categories of personal data and the recipients of such personal data.

8.2 Right to rectification

You have the right to, without undue delay, have incorrect personal data about you rectified. You may also have the right to have incomplete personal data completed.

8.3 Right to erasure

You have the right to obtain that we erase your personal data without undue delay in the following circumstances:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- Our processing is based on your consent and you withdraw your consent to the relevant processing;
- You object to processing that we carry out based on a legitimate interest, and your objection overrides our or another party's legitimate interest of the processing;
- The processed personal data is unlawfully processed;
- The processed personal data has to be erased for our compliance with one or more legal obligations.

8.4 Right to restriction

You have the right to request that we restrict the processing of your personal data in the following circumstances:

- You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- The processing is unlawful and you oppose erasure of the personal data and request restriction instead;
- The personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defence of legal claims;
- You have objected to the processing of the personal data which we carry out based on a legitimate interest, pending the verification whether your objection overrides our or another party's legitimate interest to continue with the processing.

8.5 Right to object

You have a right to object to our processing of your personal data when it is based on our or another party's legitimate interest. If you object, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms in order to be allowed to continue with our processing.

8.6 Right to data portability

If our processing of your personal data is based on the performance of a contract with you or your consent, you have the right to receive the personal data you have provided us relating to you in an electronic format. You also have the right to have the personal data transferred from us directly to another data controller, where technically feasible.

We ask you to observe that this right to so called data portability does not cover personal data which we process manually.

8.7 Right to withdraw consent

If our processing of your personal data is based on your consent, you always have the right to withdraw your consent at any time. A withdrawal of your consent does not affect the lawfulness of the processing that took place based on the consent before your withdrawal.

9. Complaints with the supervisory authority

In Sweden, the Swedish Authority for Privacy Protection (*Sw. Integritetsskyddsmyndigheten*) is the authority responsible for supervising the application of current data protection legislation. If you believe that we process your personal data in a wrongful manner, we encourage you to contact our Data Protection Officer so that we can review your concerns and find a suitable solution to your problem. However, you may file a complaint with the Swedish Authority for Privacy Protection at any time or in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.