# Ascelia Pharma AB - Privacy policy

# 1. Scope of the privacy policy

- 1.1 Below, it is described how Ascelia Pharma AB, company reg no. 556571-8797, with the address Medeon Science park, Per Albin Hanssons väg 41, 205 12 Malmö, ("Ascelia", "us" or "we"), process personal data in relation to you.
- 1.2 Privacy matters are important to us and we prioritize your integrity. Therefore, it is important for us to protect your personal data and to ensure that our processing of the data is conducted in a correct and lawful way.
- 1.3 In this privacy policy, we explain which types of personal data we may process and for what purpose we process such data. We also detail our processing of personal data as well as what your choices and rights are in relation to such processing. We kindly ask you to carefully read our privacy policy and acquaint yourself with its content.
- 1.4 Please note that this privacy policy applies to processing over which Ascelia is the controller. This means that we are responsible for the handling and processing of your personal data. It also means that you should turn to us with questions and comments, or if you wish to enforce any of your rights in relation to our processing of your personal data.

## 2. Processed personal data

- 2.1 We may process the following personal data attributable to you as a contact at our partner companies, a consultant or a contact person at a study site:
  - (a) Name;
  - (b) e-mail address;
  - (c) telephone number; and
  - (d) information regarding your employer and your title.
- 2.2 We may process the following personal data attributable to you as a job applicant:
  - (a) Name;
  - (b) e-mail address;
  - (c) telephone number;
  - (d) CV; and
  - (e) cover letter.
- 2.3 We may process the following personal data attributable to if contacting us through the Ascelia website:
  - (a) Name;

- (b) e-mail address; and
- (c) telephone number.
- 2.4 We may process the following personal data attributable to as a shareholder:
  - (a) Name; and
  - (b) e-mail address.

# 3. The purpose and legal grounds of the processing

- 3.1 We process your personal data attributable to you as a contact at our partner companies, a consultant or contact at a study site for the purpose of, and based on our legitimate interest in, purchasing goods and services, keeping ongoing contacts regarding studies and administering contracts.
- 3.2 We process your personal data attributable to you as a job applicant for the purpose of, and based on our legitimate interest in, 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.
- 3.3 We process your personal data attributable to you when contacting us through the contact form at the Ascelia website for the purpose of, and based on our legitimate interest in, following up on questions and inquiries from you.
- 3.4 We process your personal data attributable to you as a shareholder for the purpose of, and based on our legitimate interest in, providing newsletters and information to you relating to our business operations.

#### 4. Storage of personal data

- 4.1 We store your personal data as long as necessary for us to fulfil the purpose of the processing. We will always process your personal data to the extent and during the period of time that we are required to by law.
- 4.2 Subject to 4.1,
  - (a) 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;
  - (b) personal data on contact persons on the Ascelia website is only kept for one year from the last contact between the contact person and Ascelia;
  - (c) personal data on you as a contact person at a company partner, a consultant or at a clinical study site is stored for six months after the relationship with the entity where you are the contact person ends or after you cease being a contact with the entity; and
  - (d) personal data on you as a shareholder is stored until you are a shareholder, however not after you oppose receiving newsletters and information.

4.3 If your personal data is no longer necessary for us in order to fulfil the purpose of the processing, or if the processing for any other reason is no longer allowed, the data will be anonymized or deleted.

## 5. Recipients

We may disclose your personal data with our processors, for example group companies and companies providing hosting services or IT- and cloud services. In such cases, data processing agreements will be entered into to make sure that your personal data is processed only in accordance with this privacy policy.

## 6. Your rights

- 6.1 You have the right to receive confirmation on whether or not we process personal data concerning you, and in such cases get access to such personal data and also information regarding the personal data and how we process it.
- 6.2 You have the right to have inaccurate personal data concerning you rectified without undue delay. Taking into account the purposes of the processing, you also have the right to have incomplete personal data about you completed.
- 6.3 You have, under certain circumstances, the right to have personal data concerning you erased, for example if the personal data is no longer necessary in relation to the purposes for which it was collected or if the personal data have been unlawfully processed.
- In some circumstances you have the right to obtain restriction of the processing of your personal data. For example if you contest the accuracy of the personal data, you can also require that we restrict the processing of your personal data for such a period that enables us to verify the accuracy of the personal data.
- You have the right to object to processing of your personal data that is based on our legitimate interests. If this is done, we must provide compelling legitimate grounds for the processing which outweigh your interests, rights and freedoms, in order to proceed with the processing of your personal data.
- You have the right to object to our processing of your personal data to the extent such data is processed for direct marketing. Upon such objection, we will no longer process your personal data for that purpose.
- 6.7 You have the right to withdraw a consent provided by you at any time by contacting us. If your consent is withdrawn, we will no longer process your personal data for the purpose that you had given your consent to.
- You have the right to receive the personal data relating to you and that you have provided to us, in a commonly used electronic format. You have the right to transmit that data to another controller (data portability).
- 6.9 If you have any comments on our processing of your personal data, you are welcome to contact us. You also have the right to lodge a complaint to the Swedish Data Protection Authority (*Sw*. Integritetsskyddsmyndigheten).

# 7. Additions and amendments

We may make additions and amendments to this privacy policy. If we do so, we will publish the amended policy to our website. In such case, we kindly ask you to carefully review the updated privacy policy.

## 8. Contact us

To update, correct or erase data we have about you or to enforce your rights as described above, you are welcome to contact us at moc@ascelia.com.

This privacy policy enters into force on 25 May 2018