

Guard Therapeutics' privacy policy

1. Scope of the privacy policy

- 1.1 Below, it is described how Guard Therapeutics AB, company reg. no. 556755-3226, with the address Scheelevägen 22, 223 63 Lund, ("Guard Therapeutics", "us" or "we"), process personal data in relation to you.
- 1.2 Privacy matters are important for us. Therefore, it is important for us to protect your personal data and ensure that our processing of the data is conducted in a correct and lawful manner.
- 1.3 In this privacy policy, we explain which types of personal data we may process about you and for what purpose we process them. We also detail our processing of personal data as well as what choices and rights you have in relation to such processing. We kindly ask you to carefully review our privacy policy and acquaint yourself with its content. You can always find the latest version of this policy on our website, <https://guardtherapeutics.com/en/p/privacy-policy>.
- 1.4 Please note that this privacy policy relates to processing of personal data for which Guard Therapeutics is the controller. This means that we are responsible for the processing of your personal data. It also means that you should turn to us with questions or remarks, or if you wish to enforce any of your rights in relation to our processing of your personal data.
- 1.5 We may gather personal data about you from different sources, including directly from you personally, or from your employer. We may also gather other personal data about you from public sources, such as databases or websites.

2. The personal data that is processed

2.1 If you are a contact at an external party (supplier, partner, etc.)

Purpose	Lawful basis	Personal data	Storage period
Administering non-disclosure agreements and to be able to maintain ongoing contacts.	Our legitimate interest to save data in order to administer the non-disclosure agreement.	Name. Company name. Personal identity number (if individual person/Sole proprietorship (<i>Sw. Enskild firma</i>)).	7 years after the termination of the agreement.
Administering other agreements and to be able to be able to maintain ongoing contacts.	Our legitimate interest to save data in order to administer the contractual relationship.	Name. Company name. Personal identity number (if individual person/Sole proprietorship <i>Sw. Enskild firma</i>).	Reviewed annually.

2.2 If you are a shareholder

Purpose	Lawful basis	Personal data	Storage period
Invite to and hold annual general meeting.	To fulfill our legal obligations to invite to and hold general annual meeting.	Name. Personal identity number. Number of shares.	10 years after annual meeting.
Maintain share register.	To fulfill our legal obligation to keep share register.	Name. Personal identity number. Number of shares. Class of shares (Reg. class).	Reviewed annually.
Enable subscription of press releases.	Your consent.	Name. E-mail address.	Until the subscription is terminated.

2.3 If you are practitioner involved in clinical studies

Purpose	Lawful basis	Personal data	Storage period
Fulfill documentation requirements.	Fulfill legal obligations regarding documentation requirements in connection with clinical studies.	Name. Telephone number. E-mail address. Address.	Practitioners of clinical studies that are companies or other organizations: 2 year after the termination of the study. In case the practitioner is a private person such as an individual doctor: five years in accordance with the regulations of the Swedish Medical Product Agency.

2.4 If you are a doctor or a representative for a healthcare organization or healthcare association and have a professional relationship with us

Purpose	Lawful basis	Personal data	Storage period
Disclosure of transfers of value on an individual level in accordance with the ethical rules of Läkemedelsindustriföreningen (LIF).	Your consent.	Name. Personal identity number. E-mail address. Phone number. Information about your employer/organization. Your title. Information on transfers of value. Country and place of practice. Financial details such as payment-related data including tax identification number.	For as long as the data is necessary to fulfil our obligations to disclose such personal data.
Processing for disclosure of transfers of value on an aggregated level in accordance with the ethical rules of Läkemedelsindustriföreningen (LIF). We will not disclose such data to any third party in individual form, but only in an aggregated, anonymized form.	Our legitimate interest of fulfilling our disclosure obligations under LIF's ethical rules.	Name. Personal identity number. E-mail address. Phone number. Information about your employer/organization. Your title. Information on transfers of value. Country and place of practice. Financial details such as payment-related data including tax identification number.	For as long as the data is necessary to fulfil our obligations to disclose such personal data.

2.5 If you are a job applicant

Purpose	Lawful basis	Personal data	Storage period
For the purpose of facilitating and following up on job applications.	Your consent in connection with applying for a job.	Name. Telephone number. E-mail address. CV. Cover letter.	During the ongoing recruitment process.

2.6 If you are an individual contacting us through our contact form

Purpose	Lawful basis	Personal data	Storage period
To be able to answer your question or provide other feedback.	Your consent.	Name. E-mail address.	During the ongoing matter.

2.7 If you are a subscriber to our newsletter

Purpose	Lawful basis	Personal data	Storage period
Enable subscription of press releases.	Your consent.	Name. E-mail address.	Until the subscription is terminated.

2.8 If you visit our website

We may process the certain personal data relating to you when visiting our website. For more information, please see our [cookie policy](#).

3. Storage of personal data

In addition to the specific retention times included in the tables above some data may be stored for a time in order to achieve the purpose of the processing. In the event that we have specified an interval where the data, for example, is controlled on an annual basis, we will at the specified time delete data that is no longer necessary for the purpose of the processing.

4. Recipients

4.1 The personal data that we collect may be shared with the following types of third parties:

- (a) with other companies within the group;
- (b) with authorities, courts or other third party where we find the extradition necessary (i) due to applicable law or regulation, (ii) in order to exercise, determine or defend legal claims, or (iii) in order to protect your or anyone else's basic interests;
- (c) with a prospective purchaser (and their representatives and advisors) in connection with a proposed purchase, fusion or acquisition of any portion of our business, provided that we inform the transferee to only use your information in a manner that is consistent with this privacy policy; and
- (d) with another third party provided that you have consented to such sharing.

4.2 Sharing of personal data between the group companies is carried out for the purposes of streamlining and centralizing the business operations of Guard Therapeutics. The sharing of personal data is carried out on the basis of our legitimate interest to streamline the administration and processing within the group and maintain an effective business structure.

4.3 We may also share your data with our data processors, such as companies working in accounting or IT and cloud services. When we use such service providers we enter into data processing agreements to ensure that your personal data is processed in accordance with this policy.

5. Transfer of personal data to third countries

In case we transfer or process personal data outside the EU/EEA, we will only do so when such transfer or processing is lawful under Articles 45-49 of the General Data Protection Regulation. To receive a copy of the appropriate safeguards that have been undertaken or to get information about how to get access to such information, contact info@guardtherapeutics.com.

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.
- 6.4 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 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.
- 6.5 You have the right to object to processing of your personal data that is based on the legitimate interests of Guard Therapeutics. If this is done, we must provide compelling legitimate grounds for the processing which overrides your interests, rights and freedoms, in order to proceed with the processing of your personal data.
- 6.6 If we base the processing of your personal data on your consent, you have the right to withdraw your consent at any time. If you withdraw your consent, Guard Therapeutics will no longer process the personal data based on the consent.
- 6.7 In some circumstances, you have the right to receive 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).
- 6.8 You have the right to complain on the processing of your personal data by lodging a complaint to the Swedish Data Protection Authority (*Sw. Datainspektionen*).

7. Additions and amendments

We may make additions or amendments to this privacy policy. If we do so, we will inform you in a suitable way, e.g. by email or through a message on our in-

tranet. In such case, we kindly ask you to carefully review the updated privacy policy.

8. Contact us

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

This privacy policy enters into force on 24 March 2020