

CONFIDENTIALITY POLICY

Lokon Pharma maintains the highest level of respect for your confidentiality. We have adopted this **Confidentiality Policy** to support our commitment to upholding your rights in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("**GDPR**"). This policy may be updated from time to time.

WHICH INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Lokon Pharma collects and uses personal data from employees, job applicants, partners, business contacts, suppliers or anyone else who wants to utilize the company's services and products as well as from anyone who contacts us. Lokon Pharma may also collect and use personal data from potential customers and/or suppliers. The purpose of processing this personal data can vary. However, your personal data is always processed with a legal basis, as defined in accordance with the provisions set for in GDPR.

Employees

Lokon Pharma has prepared a confidentiality policy specifically for the company's employees, consultants and elected representatives.

Job applicants

For job applicants, we save the personal data provided in your application/notice of interest and CV. The company uses this personal data for recruiting purposes. The legal basis for the processing of this personal data is stated in Article 6.1 f) of GDPR: **balance of interests**. Processing is permitted because it is necessary for meeting our legitimate interest in handling your application /notice of interest concerning possible employment with us.

You are informed that this Confidentiality Policy is available on the website.

Partners/Business Contacts

For partners/business contacts Lokon Pharma collects and uses personal data such as company information as well as names and contact information of employees at the company. The data is used to fulfil our contractual obligations with our partners/business contacts. These personal data processing activities have their legal basis in Article 6.1 b), 6.1 c) and 6.1 f) of GDPR: **contract, legal obligation** and **balance of interests**. Processing is permitted because it is necessary for fulfilling contracts and legal obligations pertaining to contracts, and because it is necessary for meeting our legitimate interest in handling partners/business contacts relations.

Patients

For patients participating in a clinical trial, sponsored by Lokon Pharma to evaluate the safety and efficacy of their drug candidates, the treating clinic collects and uses the patient's personal data and clinical information according to applicable laws and regulations. In the clinical trial, the treating clinic will remove the patient's personally identifiable information and instead will use a study-

specific ID number that is connected to his or her health information. The subject identification list, which allows unblinding, will only be available at the treating clinic. The blinded data is collected and used by Lokon Pharma for analysis of the clinical studies. The results for each clinical study are reported to the applicable regulatory authorities. The legal basis for the processing of this personal data is stated in article 6.1 a) together with article 9.2 a), article 6.1 c), and article 6.1 e) of GDPR: **informed consent, legal obligation** and **balance of interests**. Processing is permitted as a consequence of the patient's informed consent and because it is necessary for fulfilling our contracts and legal obligations, as well as for meeting our legitimate interest in handling partner/business contacts. The clinical study results may be used by Lokon Pharma for presentations and publications, e.g. for scientific conferences and medical journals, but these presentations and publications will not contain personally identifiable information.

The aforementioned means that Lokon Pharma will not have access to personally identifiable information from individual patients participating in their clinical studies, in accordance with applicable laws and regulations, except for the study ID number assigned to the patient by the treating clinic. We therefore ask participating patients not to contact Lokon Pharma directly, but instead please contact the treating clinic.

Suppliers

For suppliers, Lokon Pharma collects and uses personal data such as company information and names and contact information of employees at the company. The data is used to fulfil our contractual obligations with our suppliers. These personal data processing activities have their legal basis in Article 6.1 b), 6.1 c) and 6.1 f) of GDPR: **contract, legal obligation** and **balance of interests**. Processing is permitted because it is necessary for fulfilling customer contracts and legal obligations pertaining to customer contracts, and because it is necessary for meeting our legitimate interest in handling supplier relations.

Potential Partners/Business Contacts

Lokon Pharma collects and uses personal data related to potential customers and, where applicable, suppliers, including company information as well as names and contact information of employees at the company. The data is used for marketing purposes in customer relationship management and to be able to contact so-called prospects. These personal data processing activities have their legal basis in Article 6.1 f) of GDPR: **balance of interests**. Processing is permitted because it is necessary for meeting our legitimate interest in performing customer relationship management and for contacts with prospects.

Answer to question, etc.

When you communicate with us, we process your personal data in the form of your name, e-mail address and, in certain cases, telephone number and address as well as any comments you submit in your communication with us. These personal data processing activities have their legal basis in Article 6.1 f) of GDPR: **balance of interests**. Processing is permitted because it is necessary for meeting our legitimate interests in handling your questions and comments.

Fulfilling legal obligations

Lokon Pharma also processes relevant personal data to fulfil legal obligations, such as those resulting from accounting and tax legislation. These personal data processing activities have their legal basis in Article 6.1 c) of GDPR. Processing is permitted because it is necessary for Lokon Pharma to fulfil its legal obligations according to the law.

Establishment, exercise and defense of legal claims

Lokon Pharma may process relevant personal data to establish, exercise and defend legal claims in the case of a dispute between you and Lokon Pharma. These personal data processing activities have their legal basis in Article 6.1 f) of GDPR. Processing is permitted because it is necessary for Lokon Pharma to be able to fulfil its legitimate interest in establishing, exercising and defending legal claims.

HOW LONG DO WE SAVE YOUR PERSONAL DATA?

How long your personal data is saved with us varies depending on why the data was collected. Your personal data is saved as long as it is needed to fulfil the purposes stated in this Confidentiality Policy, unless it is necessary to save the personal data for longer than stated in this Confidentiality Policy or it is permitted by law. The following criteria are used to determine how long we save data:

- as long as we have an ongoing relationship with you (either as a private individual or in your role as an employee at one of our corporate customers, suppliers or partners)
- as long as required according to the legal obligations that Lokon Pharma is bound by (for example account and tax law)
- as long as appropriate in light of Lokon Pharma's legal situation

DISCLOSURE AND TRANSFER OF PERSONAL DATA

Lokon Pharma may release personal data to processors acting on Lokon Pharma's behalf as well as to other external parties, such as IT providers or other service providers who process personal data according to Lokon Pharma's instructions. If the release of personal data means transferring it outside the EU/European Economic Area (EEA), Lokon Pharma will ensure that agreements are signed between Lokon Pharma, as the party sending the personal data, and the external party in question, and/or that other security measures are taken before such a transfer takes place.

You have the right, upon request, to obtain a copy of documentation that can prove that appropriate security measures were taken to protect your personal data when it was transferred outside the EU/EEA. In this case, please contact us at the contact information provided in this Confidentiality policy.

SECURITY

Lokon Pharma has taken appropriate technical and organizational measures to protect personal data against loss, misuse, unauthorized access, disclosure, alteration and destruction. To ensure that personal data is processed securely and confidentially, we use a tamper-proof data network with industry-standard firewalls and password protection. To ensure the confidentiality of the personal data you provide via the Internet, we may use encryption techniques when we transfer such personal data over the Internet to our servers.

WHAT RIGHTS DO YOU HAVE?

Right to access

You have the right to obtain evidence of whether we process your personal data and, if we do, how we process it. Exactly which information you are entitled to is stated in Article 15 of GDPR.

If we process your personal data, you have the right to a copy of it.

Right to rectification

You have the right to, without unnecessary delay, have your personal data corrected if it is incorrect or misleading. You also have the right to complete incomplete personal data.

Right to erasure (“the right to be forgotten”)

Under certain circumstances, you have the right to have your data erased, for example when the data is no longer necessary for the purpose for which it was originally collected.

Erasement of personal data may not be possible, however, if the data is still needed to fulfil a contract with you or if we are obligated to process it according to law. Exactly which information you are entitled to have erased is stated in Article 17 of GDPR.

Right to object

You have the right to object to the processing of your personal data at any time on the grounds of balance of interests. If we have no legitimate grounds to continue processing the personal data, we will cease processing.

If the personal data is processed for the purpose of direct marketing, we will always cease processing if you object to it.

Right to restriction

Under certain conditions, you have the right to request restriction of a specific processing of your personal data, with the implication that we will temporarily cease processing your personal data other than with your consent, except for the purpose of storing, legal claims or to protect the rights of another natural person or legal entity.

Right to portability

In cases where personal data has been received by Lokon Pharma from you, you have the right to request a machine-readable copy of the personal data processed on the basis of your consent or on the basis that processing is necessary to fulfil an agreement with you (data portability), and to request that the information be transferred to another controller (if possible).

Right to revoke consent

You always have the right to revoke your consent to personal data processing in cases where the processing is based on your consent.



Policy: POL-02-01

Effective Date: 19/19/2019

Title: Confidentiality Policy

CONTACT US

If you have questions about this Confidentiality Policy or the processing of your personal data, or if you want to erase or correct incorrect information or otherwise exercise your rights according to GDPR, contact us at the contact information below:

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