

Alligator's privacy policy

1. Scope of the privacy policy

- 1.1 Below, it is described how Alligator Bioscience AB, company reg. no. 556597-8201, with the address Scheelevägen 2, 223 81 Lund, Sweden, and its subsidiaries, ("Alligator", "us" or "we"), process personal.
- 1.2 Privacy matters are important to us and your integrity is our priority. 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.
- 1.4 Please note that this privacy policy relates to processing of personal data for which Alligator 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 Generally, the Alligator entity that you enter into an agreement or have contact with is the responsible data controller of your personal data. However, personal data may be shared within the Alligator Group and, thus, other Alligator Group entities may also act as data controller with regards to your personal data. Personal data may be shared by an Alligator Group entity to another, and processed by the receiving Alligator Group entity, in accordance with this privacy policy. In case of such transfer, the receiving Alligator Group entity is the responsible data controller of your personal data for the purpose of which the data was received.
- 1.6 Sharing of personal data within the Alligator Group is carried out for the purposes of streamlining Alligator's business operations and internal administration. The sharing of personal data is carried out on the basis of the Alligator Group's legitimate interest to maintain an effective business structure.
- 1.7 Our privacy policy is applicable when we process personal data that is collected from you. The privacy policy is also applicable in cases where we collect data about you from authorities or other sources.

2. The personal data that is processed

Corporate partners

- 2.1 Personal data refers to data that can be attributed to you personally. We may process the following personal data attributable to you as a corporate partner (e.g. suppliers, distributors and research collaborators):

- (a) name;
- (b) title;
- (c) telephone number;
- (d) e-mail address;
- (e) business address;
- (f) social security number (for sole traders, *Sw. enskilda näringsidkare*); and
- (g) name of employer.

Job applicants

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;
- (e) assessment by recruiters; and
- (f) performance analysis/results.

Healthcare professionals and other persons involved in clinical studies

2.3 We may process the following personal data attributable to you as a healthcare professional or other person involved in clinical studies (e.g. site staff):

- (a) name;
- (b) title;
- (c) hospital;
- (d) organization/employer;
- (e) e-mail address;
- (f) address;
- (g) telephone number;
- (h) CV;
- (i) participation in educational efforts by Alligator;
- (j) participation in market research activities organized by Alligator; and
- (k) remuneration or recovery of costs.

Subscribers to newsletter

2.4 We may process the following personal data attributable to you as a subscriber to our newsletter:

- (a) name;
- (b) company; and
- (c) e-mail address.

Office visitors

2.5 We may process the following personal data attributable to you as a visitor at our premises:

- (a) name; and
- (b) company.

Website visitors

2.6 We may process the following personal data attributable to you as a website visitor:

- (a) cookies;
- (b) location; and
- (c) IP-address.

Investors and insiders

2.7 We may process the following personal data attributable to you as an investor or insider:

- (a) name;
- (b) telephone number;
- (c) e-mail address;
- (d) organization/employer; and
- (e) information regarding closest relatives.

3. The purpose with the processing and legal grounds

Corporate partners

3.1 The personal data listed above in 2.1(a)-(g) is processed for the purposes of, and based on our legitimate interest in, project management, administering agreements with corporate partners, project participators and suppliers/distributors, contacts regarding business and sales purposes and marketing. Furthermore, the personal data is processed for the purpose of, and based on our legitimate interest in, invoicing company partners.

3.2 The personal data listed above in 2.1(f) is processed for the purpose of invoicing and other business administration, and conducted on the legal basis of being necessary for the performance of the contract with the sole trader.

Job applicants

- 3.3 The personal data listed above in 2.2(a)-(e) is processed for the purpose of, and based on our legitimate interest in, assessing job applicants prior to potentially hiring you and to be able to carry out online personality tests of the applicant. The personal data may also be processed for future recruitment purposes on basis of your consent.

Healthcare professionals and other persons involved in clinical studies

- 3.4 The personal data listed above in 2.3(a)-(k) is processed for the purpose of maintaining customer relations, giving feedback, support follow-up, establishing new sales channels, invoicing, fulfillment of the contract with county councils (for example regarding educational efforts) and fulfilling legal requirements on cooperation with healthcare professionals.
- 3.5 The personal data in 2.3(a)-(h) is processed based on our legitimate interest in maintaining customer relations, providing feedback, following up on support cases and establishing new sales channels.
- 3.6 The personal data listed above in 2.3(i) is processed based on our legitimate interest in maintaining records of educational efforts to disclose to the contracting council.
- 3.7 The personal data listed above in 2.3(j) is processed on the legal basis of our obligation to fulfill our legal requirements to disclose cooperation with healthcare professionals.
- 3.8 The personal data listed above in 2.3(k) is processed on the legal basis of the performance of the contract with the healthcare professional, and also on our legitimate interest in reporting transfers of value. Such reports can be based on an individual level and is then based on your consent, or on an aggregated level and is then based on our legitimate interest.
- 3.9 For healthcare professionals and other persons involved in clinical studies, the personal data listed above in 2.3(a), (b), (d), (e), (f) and (g) is also processed for the purpose of, and based on our legitimate interest in, conducting research and ensuring compliance.

Subscribers to newsletter

- 3.10 The personal data listed above in 2.4(a)-(c) is processed for the purposes of providing marketing, press releases and newsletters. The processing is based on your consent.

Office visitors

- 3.11 The personal data listed above in 2.5(a)-(b) is processed for the purposes of, and on the basis of our legitimate interest in, maintaining security, facilitating the delivery of goods and appointing visitors to the correct host at Alligator.

Website visitors

- 3.12 The personal data listed above in 2.6(a)-(c) is processed for the purposes, and on the basis of our legitimate interest in, administering the website, website monitoring, optimizing the website for visitors and analysis of website activity. The processing of non-necessary cookies is also based on your consent under the Electronic Communications Act (*Sw. lagen (2003:389) om elektronisk kommunikation*).

Investors and insiders

- 3.13 The personal data relating to investors listed above in 2.7(a)-(d) is processed for the purposes of, and based on our legitimate interest in, logging investors meeting to facilitate future contacts and to keep track of such interactions.
- 3.14 Regarding insiders, the personal data listed above in 2.7(a)-(e) is processed for the purposes of complying with financial regulations and legislation, and for being able to register insider with the Financial Supervisory Authority (*Sw. Finansinspektionen*) and keep insider lists. The processing is carried out on the legal basis of our legal obligations to provide such information to the Financial Supervisory Authority and to comply with applicable laws and regulations.

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. Below, specific retention times are set out for each category of persons. If your personal data is no longer essential in order for us 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. Note that Alligator will always keep personal data as long as required under mandatory law.

Corporate partners

- 4.2 Personal data processed for the purpose of project management, administering agreements with corporate partners, project participators and suppliers/distributors will be kept for as long as necessary for the performance of the project or agreement, or for the ongoing business relationship.
- 4.3 Personal data processed for the purpose of invoicing will be stored for seven years as this is a requirement under Swedish book-keeping legislation.
- 4.4 Personal data processed for the purpose of contacting the contact person for business and sales purposes will be deleted within six months as of the date the business relation with the business contact ends.
- 4.5 Personal data processed for the purpose of marketing will be stored until you choose to opt out of additional marketing.

Job applicants

- 4.6 Personal data related to you as a job applicant will be deleted when the recruiting process is finalized. However, if you consent to it, we may store your personal data for a period of two years for the purpose of future job openings and recruitments.

Healthcare professionals and other persons involved in clinical studies

- 4.7 For personal data regarding healthcare professionals not involved in clinical studies, the retention policy in Section 4.1-4.4 will apply.
- 4.8 For healthcare professionals and other persons involved in clinical studies, personal data necessary to initiate clinical studies needs to be stored for at least ten years according to regulations. Personal data involved in an application for marketing authorization needs to be stored for at least 15 years according to applicable regulations.

Subscribers to newsletter

- 4.9 Personal data related to subscribers to newsletter is stored until you withdraw your consent.

Office visitors

- 4.10 Personal data related to office visitors is deleted within three months of your visit.

Website visitors

- 4.11 Cookies are stored in accordance with what is stated in the cookie policy.

Investors and insiders

- 4.12 Personal data related to investors and insiders will be continuously reviewed every second year and outdated personal data will then be deleted.

5. Recipients

- 5.1 We may disclose your personal data to our data processors, for example companies working with salary administration, providing insurance or providing IT- and cloud services.
- 5.2 As stated above in 1.5 above, your personal data may be shared internally within the Alligator Group. Furthermore, your personal data may be shared with third parties, such as law firms, accounting firms, recruiting firms, firms providing telecommunication services, or other third parties that Alligator comes in contact with in its business, only for the purposes set out above. You are referred to such third parties' privacy policies for information about their processing of your personal data in their capacity as data controller.
- 5.3 Your personal data may be transferred to data processors and other recipients outside the EU/EEA. In these cases, adequate safety measures will be implemented to ensure that your personal data are protected. For information on

the safety measures applied, please contact our data protection officer at privacy@alligatorbioscience.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 has 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 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.
- 6.5 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 overrides your interests, rights and freedoms, in order to proceed with the processing of your personal data.
- 6.6 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).
- 6.7 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 intranet. 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 our data protection officer at privacy@alligatorbioscience.com.

[This privacy policy enters into force on 2 May 2019]