

## Privacy Policy

This website is provided by Plusultra pharma GmbH (hereinafter "us" or "we"). We collect, process and use your personal data in accordance with this privacy policy and applicable data protection laws, in particular the EU General Data Protection Regulation (GDPR). This policy informs you about our handling of your personal data and your rights. Please read carefully.

### 1 Collection of personal data

For the purposes of this privacy policy, personal data means any information relating to an identified or identifiable individual (hereinafter "data subject").

The data subjects we collect personal data about include representatives of customers and suppliers, consultants and advisers, persons who contact or correspond with us and other individuals who we deal with. We also collect information from website visitors, please see section 3 (Cookies and Website Visitors) for details.

The categories of personal data we process include:

- If you visit our website: Information about your use of our website, in particular your IP address, date and time of request, volume of data transfer, location from which you retrieve data from our website and other connection data and sources you retrieve (this is usually done through the use of log files and cookies, see section 3 below).
- If we have business dealings with you, or if you contact us: Data about your identity (e-mail address, first name, surname, name affix, address, telephone number, if applicable) your employer and role.

### 2 Purpose and legal basis for processing personal data

We process your personal data in compliance with the provisions of this privacy policy, the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG) and all other relevant laws.

Your personal data is processed in particular for the following purposes and on the following legal basis

- (a) For the purposes of our legitimate interests or the legitimate interests of third parties under Art. 6 para. 1 f) GDPR, including:
  - i Our legitimate interests and those of our group companies in operating and promoting our business, for example providing services, information about our products and services.
  - ii For internal communication and other administrative purposes, credit checks, invitations to trade fairs and other events.
  - iii To fulfil our legal obligations (e.g. storage and documentation obligations in connection with tax and accounting requirements), Art. 6 para. 1 c) GDPR.
- (b) On the basis of your express consent pursuant to Art. 6 para. 1 a), 7 GDPR. Consent will only be relied on in exceptional cases, e.g. for the publication of photos on our company website or in our company brochures.
- (c) In order to enter into a contract with you as an individual (or take steps prior to entering into a contract with you) pursuant to Art. 6 para.1 b) GDPR. This ground is only likely to

apply to individual consultants or other data subjects we do business with. If you do not provide necessary information in these situations, then we will not be able to contract with you.

### 3 Cookies and Website Visitors

We collect information about website visitors using cookies and similar technologies. We do this with your consent or because it is in our legitimate interests to do so (pursuant to Art. 6 para. 1 f) GDPR) to ensure that our website is presented to you in the most effective and interesting way possible. Details of how we use cookies are set out below.

- (a) When you visit our website, we collect the following information about your computer: the IP address of your computer, the request of your browser and the time of this request. The status and the amount of data transferred as part of this request is recorded. The IP address of your computer is only stored for the time of your use of the website and is then immediately deleted or anonymised by shortening it. We use this data for the operation of our website, in particular to detect and eliminate website errors, to determine the utilisation of the website and to make adjustments or improvements.
- (b) We may also collect information about your use of our website through the use of so-called browser cookies. These are small text files that are stored on your data carrier and save certain settings and data for exchange with our system via your browser. A cookie usually contains the name of the domain from which the cookie data was sent as well as information about the age of the cookies and an alphanumeric identifier. Cookies enable our systems to recognise the user's device and make any preferences immediately available. As soon as a user accesses the platform, a cookie is transferred to the hard disk of the respective user's computer. Cookies help us to improve our website and to provide you with a better and more tailored service. They enable us to recognise your computer when you return to our website and thereby:
  - Store information about your preferred activities on the website, allowing us to tailor our website to your individual interests. This includes, for example, advertising that matches your personal interests.
  - To speed up the processing of your requests.
- (c) The cookies we use only store the data explained above about your use of the website. This is not done by assigning it to you personally, but by assigning an identification number to the cookie ("cookie ID"). The cookie ID is not merged with your name, your IP address or similar data that would enable the cookie to be assigned to you. You can find out how to prevent the use of browser cookies under point f).
- (d) We work together with business partners who support us in making the internet offer and the website more interesting for you. Therefore, cookies from these partner companies are also stored on your hard drive when you visit the website. These are cookies that are automatically deleted after the specified time. The cookies from our partner companies also only collect data using a cookie ID, which enables our advertising partners to address you with advertising that may actually be of interest to you. You can find out how to prevent the use of such cookies under point f).
- (e) We and our Business Partners may also use third party cookies and similar technologies, which are created by domains that are not on the website (or domain) you are visiting, such as web analytic services and advertising network services (e.g., Google Analytics). These technologies collect and analyze information about use of the website and report on activities and trends. These services may also collect information regarding the use of

other websites, apps and online resources. By using these services, we can gain helpful insights about how our websites are used and how we can improve your experiences and interactions during your visits. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout> .

- (f) You can change your browser settings to manage cookies based on your preferences, such as by modifying your browser settings, limiting or rejecting cookies, and/or deleting or declining cookies. However, if you choose to do so, you may not be able to interact with our site in the same manner and the site's functionality may be diminished or disabled. If you only wish to accept our own cookies, but not the cookies of our service providers and partners, you can set the "Block third-party cookies" setting in your browser.

#### **4 Data security**

All information that you transmit to us is stored on servers within the European Union. As the transmission of information via the Internet is not completely secure, we cannot guarantee the security of data transmitted to our website via the Internet. However, we secure our website and other systems against loss, destruction, access, alteration or distribution of your personal data by unauthorised persons by means of appropriate technical and organisational measures.

#### **5 Data disclosure**

Within our company, only those persons who need your personal data to fulfil our contractual and legal obligations will have access to it.

We share your personal data with service providers who assist us in fulfilling our contractual and legal obligations, as well as with other recipients outside of the company, insofar as this is necessary for the fulfilment of contractual and legal obligations, e.g.:

- Group Companies and Affiliates
- Professional Advisors, including Lawyers, Tax Consultants and Auditors
- Requests from Governmental or Law Enforcement Authorities and Courts
- Financial Institutions, such as Banks and Insurers
- Service Providers, including IT Suppliers, Transport Companies and other Cooperation Partners

#### **6 Storage and deletion of data**

We store your personal data as long as it is required in order to satisfy any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## 7 Transfer of your data to a third country

We may transfer your personal data in individual cases to our parent company, Nobelpharma Co., Ltd., 1-17-24 Shinkawa, Chuo-ku, Tokyo 104-0033, Japan, and to our subsidiary Plusultra pharma UK Ltd., 149 Woodstock Road, Oxford, OX2 7NA.

The following data will be transmitted: Data on the identity and contact details of the legal representative / contact person of the contractual partner.

The purpose of the data transfer is the global intra-group contract management and the execution of contracts.

Data protection is ensured on the basis of the European Commission Adequacy Decision for Japan of 23 January 2019, based on Article 45 of Regulation (EU) 2016/679, and on the basis of the European Commission Adequacy Decision for the United Kingdom of 28 June 2021, based on Article 45 of Regulation (EU) 2016/679.

## 8 To what extent do we carry out automated individual decisions or profiling measures?

Your data will not be used for automated individual decisions or profiling.

## 9 Data processing controller and data protection officer

The controller is Plusultra pharma GmbH, which can be contacted at the following address:

Fritz-Vomfelde-Straße 36  
40547 Düsseldorf  
Deutschland

Tel.: +49 (0)211 900 667 99  
E-Mail: [pup-info@plusultra-pharma.de](mailto:pup-info@plusultra-pharma.de)

You can reach the data protection officer of Plusultra pharma GmbH at the above address or by e-mail at:

[pup-dataprotection@plusultra-pharma.de](mailto:pup-dataprotection@plusultra-pharma.de)

## 10 Your data protection rights

- (a) You can request information about the data stored about you. Furthermore, you have the right to correction, deletion, restriction of processing, objection to processing and data portability. If, in exceptional cases, the data processing is based on your consent pursuant to Art. 6 para. 1 a), 7 GDPR, you have the right to revoke your consent with effect for the future. The lawfulness of the processing, which was carried out on the basis of the consent until the revocation, remains unaffected by this.
- (b) If the data processing is carried out in the public interest pursuant to Art. 6 para. 1 e) GDPR or for the protection of a legitimate interest pursuant to Art. 6 para. 1 f) GDPR, you have the right pursuant to Art. 21 para. 1 GDPR to object at any time to the processing of personal data relating to you for reasons arising from your particular situation. In the event of your objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

- (c) If we process your personal data for the purpose of direct marketing, you have the right to object at any time to the processing of your personal data for the purpose of such marketing in accordance with Art. 21 para. 2 GDPR. In the event of your objection, we will no longer process your personal data for these purposes.

## **11 Right to complain to a supervisory authority**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the data protection officer mentioned above or with the supervisory authority competent for our company if you consider that the processing of personal data relating to you infringes the GDPR (Art. 77 GDPR).

The contact details of the competent supervisory authority are:

State Commissioner for Data Protection and Freedom of Information of North Rhine-Westphalia

Kavalleriestr. 2 - 4  
40102 Düsseldorf  
Tel.: 0211/38424-0  
Fax: 0211/38424-999  
E-Mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)