

PRIVACY NOTICE

1 Changes to Our Privacy Notice

Affibody Medical AB (publ.) and its subsidiaries (collectively referred to as "Affibody" or the "Company") keeps our Privacy Notice under regular review and we will publish any updates on our web page as well as in our internal storage location.

2 Privacy Notice for External Contacts

This section of the Privacy Notice explains how we use any personal information we collect about you when having contractual business relations with Affibody or when using our website.

2.1 *What Information Do We Collect About You?*

We collect information about you when you register with us, place an order for products or services or provide shipping details. We also collect information when you voluntarily complete customer surveys, provide feedback, or apply for a job. Website usage information is collected using cookies. We may also collect contact information on tradeshow visits or other public or other business or trade venues.

In particular, we may collect and process the following categories of personal data:

- Name, gender, e-mail address.
- Your contact details, registration details, as well as your company name and position, business location, including address, phone number, company identification number, and your email address.
- Information on your requests and products purchased.
- Communication – We record and store your communications with us by email or other means. When you make a telephone communication, our customer service records your questions or complaints in our database. We may also, where appropriate, record the phone call, of which you would be informed in advance.
- Information collected when you use our websites and other digital media, if any.
- When you visit our websites, we may record your IP address, browser type, operating system, source website and web browsing behavior.
- Information related to social networks – Depending on your social network settings we may receive information from your social network provider. For example, when you identify yourself with a social network account to use our services, we may receive your social network profile including contact details, interests, and contacts. For more information on the personal data we receive from your social media provider and how to modify settings, please refer to your social media provider's website and privacy policy.
- Information you choose to share with us – You can choose to share information with us, for example, by giving us a comment on social media when completing a customer survey or submitting your data to participate in an event.

2.2 How Long Do We Store Your Personal Information?

Normally we store external contacts (customers, distributors, or other contact persons) ten years after last contact for legal obligations, or until the person wants to opt out if that is compliant with our legal obligations.

2.3 How Will We Use the Information About You?

We use the information about you to process your order, manage your account, and to email you information about other products and services we think may be of interest to you. We also use information collected from the website to personalize your repeat visits to our website. Affibody will only share your information for marketing purposes within Affibody and, to a limited extent, with our distributors for shipping purposes.

In particular, the processing may also be carried out for the following purposes:

- Carry out the necessary commercial and administrative procedures with the users of the web and our clients.
- Contact you for contract negotiations and to process your inquiries.
- In case of formalizing contracts, or accepting a quote, the data is used to process the corresponding services, orders, collection, and delivery notes, etc. In this respect, your data may be shared with third-party providers and, if necessary, we will share your payment data with the relevant financial institution.
- Send commercial advertising communications by email, social networks or any other electronic or physical means, in case you have expressly consented to the sending of such commercial communications electronically. In the event that you are a customer, we may send you commercial information related to the services you have contracted.
- Contact you to respond to your inquiries and process your complaints.
- Contact you to get your opinion about the service provided or the quality of our services.
- Similar, the data collected during your navigation are processed with the purpose of providing access to the online contents of the web, as well as attending to the requests of the users of the web, keeping a statistical record of visits (IP addresses, browser data, country, page accessed, etc.) in order to facilitate us to develop better services and products, optimize our offer, provide more efficient customer service, and improve the design and content of our websites.
- The data of Clients and / or Suppliers will be treated, within the contractual relationship that binds them with the Company, in compliance with the administrative, fiscal, accounting and labor obligations that are necessary under current legislation.
- Objection or revocation. You may object or revoke your consent to receive marketing communications at any time by following the instructions in the relevant marketing communication or by contacting us via email to dpo@affibody.se.
- In case of completing any of the forms provided on our website or by any other means, it will be necessary to provide certain personal data, which will be processed for the purpose for which they are requested.
- In accordance with the prevailing laws on electronic commerce and communication, we inform you that Affibody does not perform SPAM practices, therefore, it does not send commercial emails by e-mail if it does not have the necessary legitimacy. In any

case, you will always have the possibility to withdraw your consent to receive communications from us.

We will not process your personal data for any other purpose than those described, except by legal obligation or regulatory requirement.

You will not be subject to decisions based on automated processing that produce effects on your data.

2.4 Marketing

We might want to send you information about products and services of ours which may be of interest to you based on legitimate interest. If you do not wish to receive marketing information or material, you may opt out whenever you want to. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact reception@affibody.com.

2.5 Cookies

When you visit our website, we may send “cookies” to your computer. A cookie is a small text file or piece of data that a website that you visit can place or save onto your computer. Cookies do not themselves contain any personally identifiable information. However, if you provide such personally identifiable information to us (such as by registering for an Internet related service or password provided by us), such information may be linked to the data stored in the cookie.

There are two types of cookies. The first type saves a file for a longer period onto your computer, and it can remain on your computer after you shut it off. Such cookie could, for example, be used to tell a visitor what information on the website has been updated since his or her last visit to that website.

The second type of cookie is called "session cookie." While you are visiting a website, session cookies are temporarily stored in your computer's memory. This could be done, for example, to keep track of what language you have chosen on the website. Session cookies are not stored for a long period of time on your computer since they disappear when you close your web browser. We may use third parties to assist us in collecting or processing information obtained through cookies.

We may use cookies for several reasons, such as:

- To compile anonymous statistics related to patterns and trends of browsing.
- To analyze sales data.
- To conduct marketing research.
- To user adapt website content or functions.
- To aid or track site visits of users, of certain Internet-based services.
- To enable users with passwords to re-enter certain web pages without having to re-type previously typed information.

Your choices regarding cookies:

- If you have not given your consent to the use of cookies, no cookies will be placed on your device.
- If you would like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.
- Please note that if you delete cookies or refuse to accept them, you might not be able to use all the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

2.6 Other Websites

Our website may contain links to other websites. This Privacy Notice only applies to the website within Affibody. When following links to other websites, you should read their privacy policies.

3 Privacy Notice for Applicants, Employees, and Consultants

This section of the Privacy Notice explains how we use any personal information we collect about you when you are an employee, apply for a job, or sign up as a contractor. This second part also applies to individuals such as students or interns performing work in or for Affibody.

3.1 How Your Information Will Be Used

Affibody needs to keep and process information about you for normal employment or engagement purposes. The information we collect, hold and process will be used for our management and administrative use only.

We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully, and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment, or assignment, ends, and after you have left.

This includes using information to enable us to comply with the employment contract or any other engagement contract to comply with any legal requirements, pursue the legitimate interests of Affibody and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations. We will inform you about the implications of that decision.

We may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes, maintain the security level (username and passwords) or report potential crimes. We will never process your data for legitimate interest where your interests override our interests.

3.2 The Information We Collect About You

The sort of information we hold includes your application form and references, your contract of employment, or any other form of engagement and any amendments to it; correspondence with or about you, e.g. letters to you about a pay change or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness, and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures, and, where appropriate, disciplinary and grievance records.

You will be referred to in company documents and records that are produced by you and your colleagues while carrying out your duties and the business of the company.

Where necessary, we may keep information relating to your health, which could include reasons for absence and medical reports and notes. This information will be used in order to comply with our health & safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay e.g., health insurance or life insurance policies.

We *do not process* special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, biometric data, or sexual orientation. In the case biometric data for authentication or health data is necessary we will always obtain your explicit consent to those activities unless this is not required by law, or the information is required to protect your health in an emergency.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

3.3 Who Has Access to the Information About You?

Authorized personnel may audit and monitor equipment, systems, and network traffic for security, compliance, and maintenance purposes. We also keep records of your hours of work from your time reports, as detailed in the Coworker Handbook.

We will only disclose information about you to third parties if we are legally obliged to do so, or where we need to comply with our contractual duties to you. For instance, we may need to pass on certain information to our external payroll provider, banks, credit card companies, travel agencies, pension, or health insurance schemes. In some cases, these parties act as independent controllers, and they are fully responsible for the processing of your information we provide them with.

We may transfer information about you to other processors for purposes connected with your employment or engagement or the management of the company's business. This includes payroll, insurance, and pension companies.

In limited and necessary circumstances, your information may be transferred outside of the EU/EES or to an international organization to comply with our legal or contractual requirements. We have in place safeguards to ensure the security of your data.

After applying for a job or after your employment or engagement has been ended, your personal data will be stored for a period of two years (Swedish discrimination act) or in some circumstances seven years (bookkeeping), or longer for audit purposes, after last transaction.

If, in the future, we intend to process your personal data for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information.

4 Security Back-ups

All production data is deleted in accordance with their respective retention periods. For security reasons, we keep data in encrypted back-ups also after data has been deleted from our production environment. In any event, Affibody will honour “the right to be forgotten” as well as our set retention periods, but it will not take effect fully until the last backup cycle has been completed. In order to comply with Article 32 in GDPR, this is not considered a violation of Article 17 in GDPR.

In the event of a recovery of data from an encrypted back-up, we keep a register of erased data (anonymous Record ID only) in order to exclude that data from any recovered data.

5 Transfer of Personal Data to Third Countries

In some situations, Affibody may transfer personal data to countries outside of the EU/EES. In these situations, Affibody will make the necessary measurements to protect your personal data in accordance with applicable requirements, e.g., by requiring the receiving party to protect your personal data in accordance with applicable data protection regulations as well as by signing Data Processing Agreements (DPAs).

Specifically, selected personal data is collected and stored in different cloud-based systems including but not limited to applications in the MS365-suite, DocuSign and Zoom. Personal data is kept to an absolute minimum and no sensitive or regulated personal data is transferred to these systems.

For coworkers, we have in place safeguards including an *IT Policy* and an *IT Security Policy*. Our HR records storage is situated within EU/EES to ensure the security and integrity of your data.

6 Access to Your Information and Correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email or write to us at the address below. For your security and privacy, we must make sure who is asking and where to send the information by asking for credentials. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

6.1 Your Rights

Under the General Data Protection Regulation (GDPR) you have a number of rights regarding your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

If you wish to exercise the rights that GDPR grant you, please send us an e-mail to dpo@affibody.se indicating in the subject, the right you want to exercise and attaching a copy of your national identity document or passport.

The Rights that the current regulations recognize and that, where appropriate, you can exercise are:

6.1.1 Right to Access

You have the right to have Affibody inform you whether your personal data is being processed, and in the event that the processing is confirmed, it will enable your access by providing you with the following information:

- The purposes of the treatment.
- The categories of data in question.
- The term or criteria of conservation of the data.

6.1.2 Right to Rectification

You have the right to have Affibody rectify your data when they are inaccurate or incomplete by means of an additional amending declaration.

6.1.3 Right to Be Forgotten

You have the right to have Affibody delete your data, when:

- The treatment is illegal.
- You have withdrawn your consent.
- They are no longer needed in relation to the purposes for which they were collected or processed.
- You have exercised a right of objection and other legitimate reasons for the treatment do not prevail.
- The data must be deleted to comply with a legal obligation of Affibody.

You will not have the right to have Affibody delete your data when the treatment is necessary:

- To exercise the right to freedom of expression and information.
- To comply with a legal obligation of Affibody.
- For the formulation, exercise, or defense of claims.
- For public interest based on current legislation for reasons of public health or for historical, statistical, or scientific research purposes.

6.1.4 Right to Data Portability

You have the right to have Affibody transmit your data to another data controller or to yourself, through a structured, commonly used, and machine-readable format, when the treatment is carried out by automated means and is based on:

- A consent for specific purposes.
- The execution of a contract or pre-contract communication with you.

The right to data portability shall not apply where:

- Transmission is technically impossible.
- Transmission may adversely affect the rights and freedoms of third parties.
- The processing has a purpose of public interest based on current legislation.

6.1.5 Right of Restriction of Processing

You have the right to request restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by you, for a period enabling Affibody to verify the accuracy of the personal data.
- The processing is unlawful, and you oppose the erasure of the personal data and requests the restriction of their use instead.
- Affibody no longer need the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims.
- You have objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Affibody may continue to process your data as long as legitimate interest prevails over the interests or the rights and freedoms of you.

Affibody must inform you of the right to object or restrict the processing of your data explicitly, clearly, and separately from any other information, at the time of the first communication.

6.1.6 Right to Object

You have the right to object to the processing of your personal data and ask Affibody to stop processing your personal data if it is being processed for the purpose of:

- Direct marketing.
- Scientific/historical research and statistics.
- Affibody's legitimate interest.

If you object to direct marketing, Affibody will stop using your personal data and comply with your request.

Affibody may continue to process your data as long as legitimate interest prevails over the interests or the rights and freedoms of you.

Affibody must inform you of the right to object or restrict the processing of your data explicitly, clearly, and separately from any other information, at the time of the first communication.

6.1.7 Right Not to Be Subject to Profiling

You have the right not to be subject to profiling for the purpose of which is to make individual decisions based on automated data processing and aimed at assessing, analyzing, or predicting the following personal aspects:

- Professional performance.
- Economic situation.
- Health.
- Personal preferences or interests.
- Reliability.
- Behavior.
- Location or movements of the person.

When profiling is based solely on automated processing, you will have the right to be informed if the decision that can be taken is likely to produce legal effects that significantly affect you.

You will have the right to obtain human intervention from Affibody, to express your point of view and to challenge the decision, if the treatment has been authorized by:

- The explicit consent from you.
- A contract between Affibody and yourself or your company.

It shall not apply to the right not to be subject to profiling where the decision that may be taken as a result of profiling is authorized by:

- The explicit consent from you.
- A contract between Affibody and yourself or your company.
- Processing being based on current legislation.

If you do not feel comfortable contacting us through mentioned channels, we also offer an anonymous whistleblowing function through WhistleB:

<https://report.whistleb.com/affibodyext>

7 Contact Details of Controller and Privacy Officer

Affibody AB is the controller of data for the purposes of the GDPR.

If you have any concerns as to how your data is processed, or if you have any questions about our Privacy Policy or information we hold about you, please contact our Privacy Officer.

Privacy Officer can be reached at:

dpo@affibody.se

Or

Affibody AB
Privacy Officer
Scheeles väg 2
SE-171 65 Solna
Sweden

Phone: +46 (0) 8 59 88 38 00