

## PRIVACY STATEMENT

We understand that your trust in us is the NV ADX NEUROSCIENCES' most important asset (hereinafter referred to as "ADX NEUROSCIENCES", "we" or "us"). As such, your privacy is essential for us.

This privacy statement (hereinafter referred to as "Privacy Statement") is applicable, inter alia, **(i)** to our website <http://www.adxneurosciences.com/> (hereinafter referred to as the "Website") and **(ii)** to all (commercial) relations between ADX NEUROSCIENCES and its customers, prospects and business partners.

This Privacy Statement includes information about the personal data collected by ADX NEUROSCIENCES, as well as the manner in which ADX NEUROSCIENCES uses and processes this personal data.

ADX NEUROSCIENCES wishes to emphasize that it always attempts to act in accordance with **(i)** the Belgian Privacy Law of 8 December 1992 on privacy protection in relation to the processing of personal data and/or **(ii)** the EU Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC and **(iii)** all (future) Belgian laws regarding the implementation of this Regulation.

Visiting the Website and any communication with ADX NEUROSCIENCES implies your explicit approval (through disclosure of your personal information) of the Privacy Statement and consequently how we collect, use and process your personal data.

### - Types of personal data

ADX NEUROSCIENCES can collect and process the following personal data:

- ✓ Name
- ✓ Surname
- ✓ E-mail address
- ✓ Company address and telephone number (landline and/or mobile phone)
- ✓ Job profile
- ✓ All personal data publicly available or freely provided to ADX NEUROSCIENCES (e.g. in light of email correspondence)

ADX NEUROSCIENCES also automatically collects anonymous information regarding your use of the Website. As such, ADX NEUROSCIENCES shall automatically log (for example), which sections of the Website and Platform you visit, which web browser you use, which website you visited when you obtained access to the Website. We cannot identify you through these data, but it allows ADX NEUROSCIENCES to draw up statistics regarding the use of the Website.

As note, from the donors of the samples we use in our experimental work, possible personal data we collect and process are the following:

- ✓ Age
- ✓ Gender
- ✓ Years of education
- ✓ Racial or ethnic origin
- ✓ Biomarker data

No names or other directly identifiable data is collected and processed. We only work with an unique code per sample, enabling a link by the supplier of the samples, between the data we acquire and the donor. Thus, we are not in direct contact with donors.

Samples and related data are processed compliant with the Belgian legislation on biobanking (Royal Decree of 9 Jan 2018, implementation of Art 22 of the Law of 19 Dec 2008).

- **Methods of personal data collection:**

These personal data are collected in the context of:

- ✓ Collaboration with ADX NEUROSCIENCES
- ✓ Incoming and outgoing correspondence with ADX NEUROSCIENCES
- ✓ Requesting an offer
- ✓ Appealing on the services of ADX NEUROSCIENCES
- ✓ Exchanging business cards
- ✓ Visiting the Website

All personal data, collected by ADX NEUROSCIENCES, are thus expressly and voluntarily provided by you.

- **Use of personal data**

ADX NEUROSCIENCES can use your personal data for the following purposes:

- ✓ Performance of the agreement with ADX NEUROSCIENCES (incl. preparation and follow-up thereof)
- ✓ Responding to questions (whether or not received through email)
- ✓ Drawing up a quote
- ✓ Follow-up after a meeting
- ✓ Providing support/assistance
- ✓ Issuing invoices and the collection thereof
- ✓ Conducting customer satisfaction studies, surveys and other market research
- ✓ Optimising the quality, management and content of the Website

Processing takes place on the following legal grounds, as the case may be:

- ✓ You have given consent to the processing of your personal data for one or more specific purposes
- ✓ Processing is necessary for the performance of the agreement with ADX NEUROSCIENCES or in order to take steps at your request prior to entering into an agreement
- ✓ Processing is necessary for compliance with a legal obligation to which ADX NEUROSCIENCES is subject
- ✓ Processing is necessary for the purposes of the legitimate interests pursued by ADX NEUROSCIENCES or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular when you are a child).

In the search for novel collaborations (such as with pharma, IVD or academic parties), we can collect your contact details via our existing, which can be mutual, collaborators for e.g. initiating contact.. Hereby, we make sure no harm is caused to you.

We use Legitimate Interest for these cases, resulting from a Legitimate Interest Assessment:

1. After identifying our legitimate interest;
2. we demonstrated that the processing activity is necessary to achieve that legitimate interest; and
3. we balanced the processing activity against your rights and freedoms.

- **Disclosure of personal data to third parties**

ADX NEUROSCIENCES shall not disclose your personal data to third parties, unless it is necessary in the context of performing the agreement and optimisation thereof (including but not limited to transport of deliveries to

customers and in light of database management). In this respect, (some of) your personal data may be disclosed to our IVD partners, software providers, transport partners and other service providers.

If it is necessary that ADX NEUROSCIENCES discloses your personal data to third parties, the third party concerned is required to use your personal data in accordance with the provisions of this Privacy Statement.

Notwithstanding the foregoing, it is however possible that ADX NEUROSCIENCES discloses your personal data:

- ✓ To the competent authorities **(i)** if ADX NEUROSCIENCES is obliged to do so under the law or under legal or future legal proceedings and **(ii)** to safeguard and defend our rights
- ✓ If ADX NEUROSCIENCES, or the majority of its assets, are taken over by a third party, in which case your personal data – which ADX NEUROSCIENCES has collected – shall be one of the transferred assets

In all other cases, ADX NEUROSCIENCES will not sell, hire out or pass on your personal data to third parties, except when it **(i)** has obtained your permission to this end and **(ii)** has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of your personal data.

#### - **Cross-border processing of personal data**

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be governed by the provisions of a data transfer agreement, which shall contain **(i)** the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)', or **(ii)** any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

#### - **Storage of personal data**

Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, ADX NEUROSCIENCES shall only store your personal data for the period necessary to achieve and fulfil the purpose in question, as specified in the Privacy Statement under 'Use of personal data'.

#### - **Your privacy rights**

In light of the processing of your personal data, you enjoy the following privacy rights:

- ✓ Right of access to your personal data
- ✓ Right to rectification, completion or update of your personal data
- ✓ Right to delete your personal data ('right to be forgotten')
- ✓ Right to limit the processing of your personal data
- ✓ Right to transferability of your personal data
- ✓ Right to object to/oppose the processing of your personal data

If you wish to invoke your privacy rights please contact [ann.devos@adxneurosciences.com](mailto:ann.devos@adxneurosciences.com) or complete the form for exercising your privacy rights (in annex) and deliver it to ADX NEUROSCIENCES by email or post.

In principle, you can exercise these rights free of charge via the above-mentioned form.

#### - **Security of personal data**

ADX NEUROSCIENCES undertakes to take reasonable, physical, technological and organisational precautions in order to avoid **(i)** unauthorised access to your personal information, and **(ii)** loss, abuse or alteration of your personal data.

ADX NEUROSCIENCES shall store all personal data, which we have collected in the cloud with data centre(s) in EU or onsite.

Notwithstanding ADX NEUROSCIENCES' security policy, the checks we carry out and the actions we propose in this context, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the internet, or any method of electronic storage is 100% secure, ADX NEUROSCIENCES is, in this context, not in a position to guarantee absolute security.

- **Update Privacy Statement**

ADX NEUROSCIENCES is entitled to update this Privacy Statement by posting a new version on the Website. As such, it is strongly recommended to regularly consult the Website and the page displaying the Privacy Statement, to make sure that you are aware of any changes.

- **Other websites**

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be redirected to another website or internet source that could collect information about you through cookies or other technologies. ADX NEUROSCIENCES does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of your personal data. You must check the privacy statements of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

- **Contact ADX NEUROSCIENCES**

If you have questions and/or remarks about this Privacy Statement or the manner in which ADX NEUROSCIENCES collects, uses and/or processes your personal data, please contact us:

- ✓ Via e-mail: [ann.devos@adxneurosciences.com](mailto:ann.devos@adxneurosciences.com)
- or
- ✓ Via post: Technologiepark-Zwijnaarde 94, 9052 Gent , Belgium

In case you are not satisfied with the way ADX NEUROSCIENCES handled your questions and/or remarks or have any complaints about the way ADX NEUROSCIENCES collects, uses and and/or processes your personal data, note that you have the right to lodge a complaint with the Data Protection Authority.