

# PERSONAL DATA PROTECTION POLICY FROM MEDINCELL

*Last update: 03/15/2024*

## 1. WHO WE ARE

We are MEDINCELL and any of its affiliates or subsidiaries directly or indirectly controlled by MEDINCELL (collectively, "**MEDINCELL**", "**we**", "**us**" or "**our**").

The MEDINCELL subsidiary or affiliate with which you, your employer, or your patient interact or which owns and operates the product or service with which you interact is, where applicable, the entity responsible for collecting and using your Personal Data (known as the "**Data Controller**"). For a list of all MEDINCELL entities, please refer to [Appendix 1](#) of this policy (the "**Policy**").

In the Policy, we refer to you as "**you**" or "**your**". We use the term "**Processing**" or "**Use**" when we refer to accessing, collecting, recording, organizing, structuring, retrieving, disclosing, storing, transferring, deleting or otherwise Using your Personal Data.

## 2. HOW DOES THIS POLICY APPLY TO YOU?

This Policy is a global document. It describes how MEDINCELL may Use information about you ("**Personal Information**"):

- that we collect or process online (through websites, applications, e-mails and others) (the "**Online Services**") including through the contact form, job application portal;
- when we process your Personal Data collected or processed when you interact with us in person, by telephone or by mail;
- when we process your data as an employee of a company or freelancer who provides Products or services to MEDINCELL;
- when we process your data as an employee of a company for which we provide Products or services;
- when you interact with us, including but not limited to using or visiting our sites and visiting our offices or events (e.g. trade shows and conferences) (such products, services, Online Services and other systems being collectively referred to as "**Products and services**");
- when we process your Personal Data for your possible participation as a research subject in clinical trials;
- when we process Personal Data for your possible participation in clinical trials as an investigator or member of the investigator's team;
- when we process medical data and in connection with post-marketing pharmacovigilance or materialovigilance and adverse events, complaints, and reports;
- and wherever the Policy is published or referenced;

The Policy therefore applies whether you are:

- a member of the public,
- a job applicant,
- a visitor,
- a shareholder or investor,
- a supplier or business partner,
- a patient,
- a member of a regulatory body or authority, or
- any other person with whom we have a relationship or who is involved in our business activities.

**In some cases, we may Use your Personal Data in ways that are not described in this Policy. MEDINCELL may therefore have separate privacy policies that apply to particular situations, including informed consent forms. To the extent that you have received another privacy policy or notice and those policies or notices apply, those policies or notices will govern our interactions with you and take precedence over this Policy.**

If you provide us with the Personal Data of someone other than yourself (such as a colleague, acquaintance), please note that you are responsible for complying with all applicable privacy and data protection laws before providing such information to MEDINCELL (including obtaining the consent of the person concerned, where applicable).

When we Use your Personal Data in the course of our business, we do so in compliance with applicable data protection laws, including regulatory and national law requirements that may apply to such Use.

Finally, this Policy also informs you of your privacy rights, the measures and processes we put in place to protect your data and more generally about your right to privacy.

### **3. OUR COMMITMENT AND PRINCIPLES**

At MEDINCELL, your privacy is very important to us. For us, the confidentiality of Personal Data goes beyond simple compliance with the law. MEDINCELL strives to collect, use and share the data we obtain about you in a manner consistent with our corporate values. In particular, we do so according to high ethical standards, with integrity, inclusion, fairness and transparency. We strive to base our privacy practices on recognized principles of privacy and data protection in all our activities. These principles include:

- **Transparency:** be transparent about privacy practices, policies and developments, and as well as the details of any processing carried out; specify the purposes for which Personal Data is collected and processed before collection begins.
- **Fair processing:** obtaining Personal Data in good faith by legitimate, lawful and fair means, and processing Personal Data only in accordance with the purposes for which it was collected.
- **Privacy by design:** ensuring that we create solutions and process data with privacy at the forefront and in accordance with these principles.
- **Protection:** protect Personal Data by using reasonable security measures to ensure data accuracy, data availability and limit Use to what is necessary for the purpose of processing.
- **Responsibility:** to be responsible for compliance with the measures that implement these principles, in particular by ensuring the responsibility of third parties with whom we collaborate through appropriate contracts.
- **Respecting the requests of the people concerned:** being responsive to people's rights to privacy granted by law.

### **4. USE OF YOUR PERSONAL DATA**

First of all, it is necessary to remember that "**Personal Data**" refers to any information, whether recorded electronically or otherwise, that can be used to identify a person or that we can link directly to a person, such as name, postal address, e-mail address, telephone number or credit card number, where applicable. Identification may result from a single piece of data or from the combination of several pieces of information. Personal Data may include information that indirectly identifies the person, such as a unique number assigned to a participant in a clinical trial, even in the absence of other identifying data.

MedinCell may be required to process Personal Data including information considered sensitive, for example data such as medical records, health data, ethnic or racial origin in the context of clinical trials.

The tables below show:

- the categories of Personal Data we use for each purpose;
- the purposes for which we process your personal data;
- the legal bases (in accordance with applicable regulations) on which we process your Personal Data.

Here is a general explanation of each legal basis to help you understand the tables:

- **Fulfilment of a contract:** where it is necessary for MEDINCELL (or a third party) to process your Personal Data in order to fulfil obligations arising from a contract entered into with you; or to verify information prior to entering into a new contract with you.
- **Legitimate Interest:** where MEDINCELL or a third party has an interest in using your Personal Data in a certain way, after balancing our interests against your interests or fundamental rights and freedoms by incorporating your reasonable expectations.
- **Consent:** when MEDINCELL asks you to actively indicate your agreement to the use of your Personal Data by MEDINCELL for a certain purpose.
- **Compliance with legal obligations:** when MEDINCELL must process your Personal Data to comply with a law.
- **Public interest:** this is the basis for processing that is necessary for the performance of a mission in the public interest, or a mission relating to the exercise of public authority for which the data controller is responsible. It is mainly used by public authorities, and data is very often anonymized.
- **Safeguarding vital interests:** its use is limited to the care of a person who requires emergency medical care, but who is in a state of unconsciousness and therefore cannot consent to the processing of his or her data required for treatment.

**Users of our websites, contact form and other information requests**

We may process your Personal Data when you:

- (1) visit our websites
- (2) submit online requests (contact form);
- (3) and/or subscribe to our newsletters or other information or marketing material.

What data do we process?	Where do we obtain your Data?	Why do we process your Data?	On what legal basis do we process your Data?	Who receives or may receive your Data?	How long do we keep your Data?
<p><i>Identity and contact details, such as:</i></p> <ul style="list-style-type: none"> <li>● first and last name</li> <li>● e-mail address</li> <li>● postal address</li> <li>● phone number</li> </ul> <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> <li>● civility/gender</li> <li>● employer/company represented</li> </ul> <p><i>Technical data, such as:</i></p> <ul style="list-style-type: none"> <li>● IP addresses</li> <li>● browser type and language</li> <li>● device type</li> <li>● date and time of connection</li> <li>● data collected from cookies or other similar technologies***</li> </ul>	<ul style="list-style-type: none"> <li>● you directly</li> <li>● your devices</li> <li>● our safety systems</li> </ul>	<ul style="list-style-type: none"> <li>● to provide you with access to our Products and services</li> <li>● to contact you (regarding your inquiry)</li> <li>● to manage our relationship with your organization</li> <li>● to send you updates</li> <li>● to identify and authenticate yourself</li>   <li>● to detect security incidents</li> <li>● to protect us against malicious or illegal activities</li> <li>● to ensure the appropriate use of Products and services</li> <li>● for marketing, internal</li> </ul>	<ul style="list-style-type: none"> <li>● for our legitimate interests</li> <li>● your consent</li> </ul>	<ul style="list-style-type: none"> <li>● MEDINCELL</li> <li>● partners who help us provide the Products or services or improve our marketing or management activities**:</li> <ul style="list-style-type: none"> <li>- OVH in a European data center located in France.</li> <li>- Matomo statistical tool</li> <li>- LinkedIn, X, Facebook, Youtube</li> </ul> </ul>	<ul style="list-style-type: none"> <li>● 24 months after our last contact for data relating to your identity</li> <li>● Between 2 days and 23 months depending on the cookies</li> </ul>

		research and development purposes <ul style="list-style-type: none"> <li>to navigate and interact on social networks via share buttons</li> </ul>			
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**Shareholders, investors and investor representatives**  
 We may process your Personal Data when you:  
 (1) hold MedinCell shares or prospect for MedinCell shares;  
 (2) represent and manage MedinCell securities for shareholders, investors;  
 (3) and/or subscribe to our newsletters or other information or marketing material.

What data do we process?	Where do we obtain your Data?	Why do we process your Data?	On what legal basis do we process your Data?	Who receives or may receive your Data?	How long do we keep your Data?
<p><i>Identity and contact details, such as:</i></p> <ul style="list-style-type: none"> <li>first and last name</li> <li>e-mail address</li> <li>postal address</li> <li>phone number</li> </ul> <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> <li>civility/gender</li> <li>employer/company or represented person</li> </ul> <p><i>Data relating to shareholding:</i></p> <ul style="list-style-type: none"> <li>number of MEDCL shares held, subscribed, purchased or sold</li> </ul>	<ul style="list-style-type: none"> <li>you directly</li> <li>your employer</li> <li>your devices</li> <li>our safety systems</li> <li>our partners (EuroNext, Cacéis, Banque TransAtlantique) and other third parties in the shareholder/investor relationship (NewCap, Bryan Garnier&amp;Co, Kepler Cheuvreux,</li> </ul>	<ul style="list-style-type: none"> <li>to identify and authenticate yourself</li> <li>to communicate with you, keep you informed</li> <li>to send you documents, including AGM notices</li> <li>to manage our relationship with your organization</li> <li>for shareholder management purposes</li> <li>to manage voting rights (including electronic voting) and</li> </ul>	<ul style="list-style-type: none"> <li>in preparation for or performance of a contract with you</li> <li>for our legitimate interests</li> <li>to meet a legal obligation to which we are bound*</li> </ul>	<ul style="list-style-type: none"> <li>MEDINCELL</li> <li>partners who help us provide the Products or services or management** (Zoom, Slido, EQS, Lumy)</li> <li>partners who help us improve our marketing or management activities** (NewCap)</li> </ul>	<ul style="list-style-type: none"> <li>24 months after our last prospecting contact for data relating to your identity</li> <li>5 years after use for share registers and movements of registered shares</li> </ul>

<ul style="list-style-type: none"> <li>• dates of subscription/payment/transfer of shares</li> <li>• voting rights associated with shares held</li> <li>• insider listing</li> <li>• attendance and proxy given at AGM</li> <li>• AGM voting position</li> </ul> <p><i>Technical data, such as:</i></p> <ul style="list-style-type: none"> <li>• IP addresses</li> <li>• browser type and language</li> <li>• date and time of connection</li> <li>• <b>geolocation data</b></li> <li>• data collected from cookies or other similar technologies***</li> </ul>	<ul style="list-style-type: none"> <li>• oddo-BHF, TP ICAP, PORTZAMPARC-BNP PARIBAS GROUP, JEFFERIES)</li> <li>• technical third parties who help us provide the Products or services or improve our marketing or management activities** (Zoom, Microsoft Teams, Slido)</li> </ul>	<p>AGM attendance</p> <ul style="list-style-type: none"> <li>• for marketing, internal research and development purposes</li> </ul> <ul style="list-style-type: none"> <li>• to identify and authenticate yourself</li> <li>• to detect security incidents</li> <li>• to protect us against malicious or illegal activities</li> <li>• to ensure the proper use of our Products and services</li> </ul>			
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<p><b><u>Users of online Products and services</u></b>  <b><u>(Speakers and participants in online events)</u></b>  We may process your Personal Data when you:  (1) you register, consult or use our Products and services;  (2) you register for, attend or participate in professional, educational or shareholder and investor information events that we sponsor or organize by videoconference;  (3) you use IT resources provided or controlled by MedinCell such as work and/or communication tools and/or platforms.</p>					
What data do we process?	Where do we	Why do we process	On what legal	Who receives or may	How long do we

	obtain your Data?	your Data?	basis do we process your Data?	receive your Data?	keep your Data?
<p><i>Identity and contact details, such as:</i></p> <ul style="list-style-type: none"> <li>● first and last name</li> <li>● e-mail address</li> <li>● postal address</li> <li>● phone number</li> <li>● username and password</li> </ul> <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> <li>● civility/gender</li> </ul> <p>Information about your professional life, such as:</p> <ul style="list-style-type: none"> <li>● jobs</li> <li>● employers</li> <li>● diplomas</li> </ul> <p><i>Visual and audio information, such as:</i></p> <ul style="list-style-type: none"> <li>● photos</li> <li>● video recordings (including video conferences)</li> </ul> <p><i>Technical data, such as:</i></p> <ul style="list-style-type: none"> <li>● IP addresses</li> <li>● browser type and language</li> <li>● device type</li> <li>● date and time of connection</li> <li>● URLs or uniform resource locators</li> <li>● activity on our Products and Services and reference</li> </ul>	<ul style="list-style-type: none"> <li>● you directly</li> <li>● your employer, school or principal</li> <li>● your devices</li> <li>● our safety systems</li> <li>● technical third parties who help us provide the Products or services or improve our marketing or management activities** (Zoom, Microsoft Teams, Slido)</li> </ul>	<ul style="list-style-type: none"> <li>● to provide you with access to our Products and services</li> <li>● to contact you</li> <li>● to manage our relationship with your organization</li> <li>● to identify and authenticate yourself</li> <li>● to detect security incidents</li> <li>● to protect us against malicious or illegal activities</li> <li>● to ensure the proper use of our Products and services</li> <li>● for marketing, internal research and development purposes</li> </ul>	<ul style="list-style-type: none"> <li>● in preparation for or performance of a contract with you</li> <li>● for our legitimate interests</li> <li>● if we have requested and received your consent</li> </ul>	<ul style="list-style-type: none"> <li>● MEDINCELL</li> <li>● other speakers and event participants</li> <li>● partners who help us provide the Products or IT services (Microsoft Team, OVH, DocuSign, Zoom, Slido and others)</li> <li>● partners who help us to improve our marketing or management activities** (Newcap)</li> </ul>	<ul style="list-style-type: none"> <li>● 24 months after our last contact for data relating to your identity</li> <li>● From 2 days to 23 months depending on the cookie</li> </ul>

websites or applications ● geolocation data ● data collected from cookies or other similar technologies***					
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<b>Visitors to our facilities</b> We may process your Personal Data when you: (1) visit our facilities or take part in a physical event organized by MEDINCELL.					
What data do we process?	Where do we obtain your Data?	Why do we process your Data?	On what legal basis do we process your Data?	Who receives or may receive your Data?	How long do we keep your Data?
<i>Identity and contact details, such as:</i> <ul style="list-style-type: none"> <li>● first and last name</li> <li>● e-mail address</li> <li>● postal address</li> <li>● phone number</li> </ul> <i>Other personal information, such as:</i> <ul style="list-style-type: none"> <li>● civility/gender</li> <li>● disability</li> <li>● diet</li> <li>● language</li> </ul> <i>Professional and educational information, such as:</i> <ul style="list-style-type: none"> <li>● job title</li> <li>● employers</li> <li>● professional skills</li> </ul>	<ul style="list-style-type: none"> <li>● you directly</li> <li>● our security systems (including video surveillance)</li> <li>● your employer, school or principal</li> <li>● third party (e.g. co-organizer)</li> </ul>	<ul style="list-style-type: none"> <li>● to communicate with you (about your visit)</li> <li>● to manage our relationship with your organization</li> <li>● to identify yourself</li> <li>● to personalize your visit</li> <li>● to ensure the safety of our facility and yours</li> <li>● to protect us against malicious or illegal activities</li> </ul>	<ul style="list-style-type: none"> <li>● in preparation for or performance of a contract with you</li> <li>● for our legitimate interests</li> <li>● if we have requested and received your consent;</li> <li>● to meet a legal obligation to which we are bound*</li> </ul>	<ul style="list-style-type: none"> <li>● MEDINCELL</li> <li>● partners who help us with our marketing or management activities**</li> </ul>	<ul style="list-style-type: none"> <li>● Between 3 and 24 months, depending on the event</li> </ul>



<p><i>Visual and audio information, such as:</i></p> <ul style="list-style-type: none"> <li>• photos</li> <li>• video (including video-surveillance)</li> </ul>					
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<p><b><u>Job and apprenticeship applicants</u></b></p> <p>We may process your Personal Data when you apply for or are a candidate for a job, internship or contract with MEDINCELL and you:</p> <p>(1) register, consult or use our recruitment services;</p> <p>(2) send us your professional profile and Curriculum Vitae.</p> <p>(See also the "Online Services Users" section for technical data related to the use of IT resources)</p>					
What data do we process?	Where do we obtain your Data?	Why do we process your Data?	On what legal basis do we process your Data?	Who receives or may receive your Data?	How long do we keep your Data?
<p><i>Identity and contact details, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name</li> <li>• company/employer</li> <li>• e-mail address</li> <li>• postal address</li> <li>• phone number</li> <li>• username and password</li> </ul> <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> <li>• age / date of birth</li> <li>• gender/civility</li> <li>• family situation</li> <li>• disability</li> <li>• nationality/residence permit</li> </ul> <p><i>Professional and educational</i></p>	<ul style="list-style-type: none"> <li>• you directly or through one of your contacts</li> <li>• your employer, school or principal</li> <li>• our commercial partners and other third parties (LinkedIn recruitment site, recruitment agencies)</li> <li>• your devices</li> </ul>	<ul style="list-style-type: none"> <li>• to identify and authenticate yourself</li> <li>• to contact you</li> <li>• to assess your application</li> <li>• to protect us against malicious or illegal activities</li> <li>• for administrative purposes</li> </ul>	<ul style="list-style-type: none"> <li>• for our legitimate interests</li> <li>• in preparation for or performance of a contract with you</li> <li>• if we have requested and received your consent</li> <li>• to meet a legal obligation to which we are bound*</li> </ul>	<ul style="list-style-type: none"> <li>• MEDINCELL</li> <li>• partners who help us provide recruitment services or host data (Microsoft, OVH, Lucca, Azure France)**</li> </ul>	<ul style="list-style-type: none"> <li>• 24 months after our last contact for data relating to your identity</li> <li>• Between 2 days and 23 months depending on the cookies</li> </ul>

<p><i>information, such as:</i></p> <ul style="list-style-type: none"> <li>● job title</li> <li>● employers</li> <li>● professional skills</li> <li>● professional background</li> <li>● higher education diplomas</li> <li>● certifications</li> <li>● specialized training</li> </ul> <p><i>Visual and audio information, such as:</i></p> <ul style="list-style-type: none"> <li>● Photographs</li> <li>● Video recordings</li> </ul>					
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<b><u>Business partners, institutional contacts and non-business partners (their employees, agents and subcontractors).</u></b>					
<p>We may process your Personal Data when:</p> <p>(1) you are acting as a business partner, such as supplier, consultant, service provider, or development partner with MedinCell;</p> <p>(2) we can help with administrative procedures, scientific partnerships, socio-economic development and more.</p> <p>(See also the "Online Services Users" section for technical data related to the use of IT resources)</p>					
<b>What data do we process?</b>	<b>Where do we obtain your Data?</b>	<b>Why do we process your Data?</b>	<b>On what legal basis do we process your Data?</b>	<b>Who receives or may receive your Data?</b>	<b>How long do we keep your Data?</b>
<p><i>Identity and contact details, such as:</i></p> <ul style="list-style-type: none"> <li>● first and last name</li> <li>● company/employer/institution</li> <li>● e-mail address</li> <li>● postal address</li> <li>● phone number</li> <li>● username and password</li> </ul>	<ul style="list-style-type: none"> <li>● you directly</li> <li>● our commercial and institutional partners and other third parties</li> <li>● your employer or principal</li> </ul>	<ul style="list-style-type: none"> <li>● to contact you</li> <li>● to manage our relationship with your organization</li> <li>● to identify and authenticate yourself</li> <li>● for administrative purposes</li> <li>● for marketing, internal research and development</li> </ul>	<ul style="list-style-type: none"> <li>● in preparation for or performance of a contract with you</li> <li>● for our legitimate interests</li> <li>● if we have requested and received your consent</li> <li>● to meet a legal</li> </ul>	<ul style="list-style-type: none"> <li>● MEDINCELL</li> <li>● joint working partners</li> <li>● partners who help us improve our data management or hosting activities ** (Microsoft, OVH, DocuSign)</li> </ul>	<ul style="list-style-type: none"> <li>● 5 years from account closure or termination of business relationship</li> <li>● Between 2 days and 23 months depending on the cookies</li> </ul>

<p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> <li>● gender/civility</li> <li>● date of birth</li> </ul> <p><i>Commercial and financial information, such as:</i></p> <ul style="list-style-type: none"> <li>● bank account number</li> <li>● history of financial or assistance transactions</li> <li>● supplier's national identification number</li> </ul>		<p>purposes</p> <ul style="list-style-type: none"> <li>● to protect us against malicious or illegal activities</li> </ul>	<p>obligation to which we are bound*</p>		
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**Clinical investigators and investigator team members**

We may process your Personal Data if you are an existing or potential clinical investigator or a member of a team of investigators for a clinical study that MEDINCELL is conducting on its behalf or managing on behalf of a customer.

(See also the "Online Services Users" section for technical data related to the use of IT resources)

<b>What data do we process?</b>	<b>Where do we obtain your Data?</b>	<b>Why do we process your Data?</b>	<b>On what legal basis do we process your Data?</b>	<b>Who receives or may receive your Data?</b>	<b>How long do we keep your Data?</b>
<p><i>Identity and contact details, such as:</i></p> <ul style="list-style-type: none"> <li>● first and last name</li> <li>● company/employer</li> <li>● e-mail address</li> <li>● postal address</li> <li>● phone number</li> </ul> <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> <li>● gender/civility</li> <li>● date of birth</li> </ul>	<ul style="list-style-type: none"> <li>● you directly</li> <li>● our business partners and other third parties</li> <li>● our customers</li> <li>● your employer or principal</li> </ul>	<ul style="list-style-type: none"> <li>● to contact you</li> <li>● to manage our relationship with your organization</li> <li>● to identify and authenticate yourself</li> <li>● to protect us against malicious or illegal activities</li> <li>● to ensure access to and proper use of our IT resources</li> <li>● for administrative</li> </ul>	<ul style="list-style-type: none"> <li>● in preparation for or performance of a contract with you</li> <li>● for our legitimate interests</li> <li>● if we have requested and received your consent</li> <li>● to meet a legal obligation to which we are</li> </ul>	<ul style="list-style-type: none"> <li>● MEDINCELL</li> <li>● our customers</li> <li>● other clinical investigators and/or members of investigator teams</li> <li>● clinical trial control authorities</li> <li>● partners who help us to provide management</li> </ul>	<ul style="list-style-type: none"> <li>● 15 years in active base after the end of the last research in which the professionals participated</li> </ul>

<p><i>Commercial and financial information, such as:</i></p> <ul style="list-style-type: none"> <li>• bank account number</li> </ul> <p><i>Professional and educational information, such as:</i></p> <ul style="list-style-type: none"> <li>• job title</li> <li>• employers</li> <li>• state medical license number</li> <li>• professional skills</li> <li>• professional background</li> <li>• higher education diplomas</li> <li>• certifications</li> <li>• specialized training</li> </ul>		<p>purposes</p> <ul style="list-style-type: none"> <li>• for quality assurance purposes</li> </ul>	<p>bound*</p> <ul style="list-style-type: none"> <li>• in the public interest</li> </ul>	<p>services**</p>	
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**Clinical study candidates, Clinical study participants**

We may process your Personal Data when you:

(1) have been identified as a potential candidate for clinical studies sponsored by us or conducted by us on behalf of a third party;

(2) you participate in a trial, investigation or clinical study that we sponsor or conduct on behalf of a third party.

(See also the "Online Services Users" section for technical data related to the use of IT resources)

**If you are participating in a clinical study, clinical trial or other health-related research, you must receive a separate information notice about the Personal Data we process for these purposes.**

**This information notice, and not this Policy, will govern our use of your Personal Information.**

What data do we process?	Where do we obtain your Data?	Why do we process your Data?	On what legal basis do we process your Data?	Who receives or may receive your Data?	How long do we keep your Data?
<p><i>Identity and contact details, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name</li> </ul>	<ul style="list-style-type: none"> <li>• you directly</li> <li>• your healthcare provider</li> </ul>	<ul style="list-style-type: none"> <li>• to identify and authenticate yourself</li> <li>• to contact you</li> </ul>	<ul style="list-style-type: none"> <li>• for our legitimate interests</li> <li>• in the public interest</li> </ul>	<ul style="list-style-type: none"> <li>• MEDINCELL (the people in charge of regulatory affairs and</li> </ul>	<ul style="list-style-type: none"> <li>• for candidates not included, until the end of</li> </ul>

<ul style="list-style-type: none"> <li>● e-mail address</li> <li>● postal address</li> <li>● phone number</li> </ul> <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> <li>● gender/civility</li> <li>● family situation</li> <li>● professional activity</li> <li>● physical activity</li> <li>● behavioral and lifestyle habits</li> <li>● socio-professional category</li> <li>● participation in other research</li> </ul> <p><i>Information about your general health, such as:</i></p> <ul style="list-style-type: none"> <li>● date of birth</li> <li>● sex/gender</li> <li>● disability</li> <li>● genetic data</li> <li>● ethnicity</li> <li>● identification of pathologies/diseases</li> <li>● areas of interest in medical research</li> <li>● medical history and information on past and current treatments</li> <li>● X-rays, MRIs (magnetic resonance imaging) and medical scanners</li> </ul> <p><i>Study-related information</i></p>	<ul style="list-style-type: none"> <li>● our commercial partners (clinical study centers) and other third parties</li> <li>● your loved ones or family</li> </ul>	<ul style="list-style-type: none"> <li>● to manage our relationship with you (appointments, transport, compensation)</li> <li>● to determine your eligibility for one or more clinical trials</li> <li>● to monitor your state of health during treatment in a clinical study</li> <li>● for the scientific review of the clinical study treatment</li> </ul>	<ul style="list-style-type: none"> <li>● to safeguard vital interests</li> <li>● in preparation for or performance of a contract with you</li> <li>● if we have requested and received your consent</li> <li>● to meet a legal obligation to which we are bound*</li> </ul>	<p>research registration with the authorities)</p> <ul style="list-style-type: none"> <li>● healthcare providers</li> <li>● clinical investigators and/or members of investigator teams (responsible for quality assurance, statistical analysis, etc.)</li> <li>● partners who help us to provide clinical management services**</li> <li>● partners who help us provide management services**</li> <li>● authorities responsible for monitoring clinical trials (ANSM, FDA, etc.)</li> <li>● clinical study insurance</li> </ul>	<p>study recruitment</p> <ul style="list-style-type: none"> <li>● for study participants, up to the marketing of the product studied, or up to 2 years from the last publication of research results in the active database, and 25 years in the regulatory archive</li> </ul>
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<p><i>about your health, such as:</i></p> <ul style="list-style-type: none"> <li>• participant processing dates</li> <li>• participant activity</li> <li>• biological, physical and medical data from the participant's medical follow-up</li> <li>• details on the end of treatment and use of the participant</li> </ul> <p><i>Financial information, such as:</i></p> <ul style="list-style-type: none"> <li>• bank account number,</li> <li>• financial transaction history</li> <li>• annual compensation received</li> </ul>					
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*Anonymized/de-identified data*

Anonymized data is data in which your individual personal characteristics have been removed so that you are not identifiable and the information is no longer considered Personal Data under data protection laws.

\* The legal bases invoked by MEDINCELL include those listed in Article 6 of the European Union's General Data Protection Regulation ("GDPR"), depending on the type of Personal Data.

\*\* In limited cases, recipients may include, (1) in the event of a sale, assignment or transfer to the purchaser, assignee or transferee; and, (2) regulatory officials or agents, law enforcement, courts, public authorities or others, where permitted by this Policy or required by law.

\*\*\* Please see the cookies section of this Policy for more information on how we use cookies and similar technologies.

## **5. HOW LONG WE KEEP YOUR PERSONAL DATA**

MEDINCELL will keep your Personal Data on its systems for the longest of the following periods:

- the time required to achieve the objective or objectives pursued at the time of collection, an indicative value of which is given in the tables above;
- the retention, archiving and prescription periods stipulated by law or regulation, an indicative value of which is given in the tables above;
- the end of the limitation period applicable following a dispute or investigation in connection with one of our offers or proposals, or one of our services.

## **6. THE SECURITY MEASURES WE PUT IN PLACE**

MEDINCELL uses reasonable and appropriate security measures to protect your data.

These measures include:

- staff awareness-raising and training to ensure they are aware of our obligations to protect Personal Data and the best practices to adopt to protect it (limitation, privacy by design, pseudonymisation, anonymisation, data aggregation, etc.);
- administrative and technical controls (HR, DSI) so as to limit access to Personal Data to only those personnel who need to know it for one or other of the above-mentioned purposes;
- periodic audits (DPO) to analyze the measures implemented and monitor their effectiveness;
- implementation of internal procedures and policies, in particular for managing requests to exercise rights and adapting procedures for handling confidentiality incidents;
- IT security measures to ensure protection against attacks and breakdowns, based on ISO 27001 guidelines; including firewalls, encryption, antivirus and antimalware software, and tools to prevent cyberattacks and Personal Data breaches;
- physical security measures to protect our premises, including access badges.

Although MEDINCELL takes all appropriate security measures at the time of collection of your Personal Data and in connection with any processing of Personal Data, the transmission of data over the Internet (including by e-mail) is never completely secure.

## **7. PROTECTION OF MINORS' PERSONAL DATA**

MEDINCELL does not usually process personal data from minors.

However, in certain specific cases, MEDINCELL may collect Personal Data from children of at least 15 years of age with the prior joint consent of the minor concerned and the legal representatives or guardians in order to meet certain security or legal obligations and to provide certain Products and services.

Both the legal representative or guardian and the minor concerned may, on simple request, access the information provided by the child and/or request its deletion.

## **8. TRANSFER TO OTHER COUNTRIES**

MEDINCELL may share Personal Data internationally with MEDINCELL group companies, subcontractors and partners when carrying out the activities described in this Policy. They may process your data in countries whose data protection laws are not considered as strict as those of the European Union. For example, these countries may not give you the same rights over your data.

Whenever MEDINCELL transfers Personal Data internationally, tools are used to:

- ensure that data transfer complies with applicable law;
- enable us to guarantee the same level of protection for your data as within the EU.

To ensure that each data transfer complies with applicable European legislation, MEDINCELL uses the following legal mechanisms:

- **Standard Contractual Clauses ("SCC"):** These clauses require the other party to protect your data, and provide you with protections and rights equivalent to those in the European Union.
- **Adequacy decisions:** We transfer Personal Data to countries outside the European Economic Area that apply adequate laws to protect Personal Data, as defined by the European Commission. For example, this may include the following countries: Canada, Japan, Republic of Korea, United Kingdom, Switzerland, etc., and under certain conditions the United States of America.

MEDINCELL also identifies and uses additional safeguards as appropriate for each data transfer, including:

- technical safeguards, such as encryption and pseudonymization;
- policies and processes for challenging disproportionate or unlawful requests from government authorities.

## 9. YOUR RIGHTS CONCERNING YOUR PERSONAL DATA

Please note that, in many cases, MEDINCELL cannot work effectively without processing certain Personal Data about you (e.g. your contact details). Among other things, when you contact MEDINCELL employees, they may ask you to provide information to verify your identity in order to answer your questions. If you are unable to provide this information, we may not be able to process your request.

You have the right to access, rectify and delete your data, the right to restrict processing, the right to portability of your data and the right to specify what happens to your data after your death.

Where your consent is required, you may withdraw it at any time without this affecting the lawfulness of the processing carried out prior to the withdrawal.

Furthermore, the legitimate interests pursued by MEDINCELL are systematically weighed against your interests, freedoms and fundamental rights, which require the protection of your Personal Data. MEDINCELL's interests can never take precedence over yours. Therefore, you may legitimately request clarification regarding the balancing of MEDINCELL's legitimate interests against your own.

The table below explains:

- your rights;
- the circumstances in which they apply (such as the required legal basis);
- how to promote them.



You have the right...	How?
<b>Be informed</b> to be informed about the Personal Data we process about you and how we process it.	MEDINCELL informs you: <ul style="list-style-type: none"> <li>• through this Policy;</li> <li>• through information provided to you when you use our Products and services;</li> <li>• by answering your specific questions and requests when you contact us.</li> </ul>
<b>Access</b> request access to the Personal Data we process about you.	To request a copy of your Personal Data, please contact us.
<b>Rectification</b> ask us to modify or update your Personal Information if it is inaccurate or incomplete.	To request rectification of your Personal Data, please contact us.
<b>Delete</b> request the deletion of some of your Personal Data.  For example, you can ask us to delete personal data: <ul style="list-style-type: none"> <li>• that we no longer need for the purposes for which they were collected;</li> <li>• that we process on the legal basis of consent, and for which you withdraw your consent;</li> <li>• if you object (see "Objection" below) and your objection is justified, or if you object to direct marketing.</li> </ul> In certain cases, MEDINCELL will be unable to delete your data, for example: <ul style="list-style-type: none"> <li>• where it is still necessary for us to process the data for the purposes for which it was collected;</li> <li>• when MEDINCELL's interest in using the data outweighs your interest in deleting it. For example, if we need this data to protect our services against fraud;</li> <li>• MEDINCELL is legally obliged to retain the data; or</li> <li>• if MEDINCELL needs this data to establish, exercise or defend its rights.</li> </ul>	To request the deletion of your Personal Data, please contact us.
<b>Restriction</b> ask us to stop processing all or part of your Personal Data.  You can do this if: <ul style="list-style-type: none"> <li>• your Personal Data is inaccurate;</li> </ul>	You can exercise your right of restriction by contacting us.

	<ul style="list-style-type: none"> <li>• our processing of your data is unlawful;</li> <li>• we do not need your information for a specific purpose; or</li> <li>• you object to the processing of your data, and we will evaluate your objection. See "Objection" below.</li> </ul> <p>You can ask us to stop this treatment temporarily or permanently.</p>	
<b>Opposition</b>	<p><b>to object to the processing of your Personal Data.</b></p> <p>You can do this if:</p> <ul style="list-style-type: none"> <li>• MEDINCELL processes your Personal Data on the legal basis of legitimate interests; or</li> <li>• MEDINCELL processes your Personal Data in order to offer you personalized advertising.</li> </ul>	To exercise your right to object, please contact us.
<b>Data portability</b>	<p><b>request a copy of your Personal Data in electronic format and transmit such Personal Data for use by a third-party service.</b></p> <p>You may ask us to pass on your data when we process your Personal Data on the legal basis of consent or contract performance.</p>	To find out more about exercising your right to portability, see "Access" above.
<b>Not subject to automated decision-making</b>	<p><b>not to be the subject of a decision based solely on automated decision-making (decisions not involving human beings), including profiling, where the decision would have a legal effect on you or produce a similar significant effect.</b></p>	MEDINCELL does not normally make this type of automated decision.
<b>Withdrawal of consent</b>	<p><b>withdraw your consent to the collection or use of your Personal Data.</b></p> <p>You may withdraw your consent if MEDINCELL processes your Personal Data on the legal basis of consent.</p>	To withdraw your consent, you must contact us.
<b>Right to file a complaint</b>	<p><b>Contact your local privacy authority with any questions or concerns.</b></p>	<p>As far as the French authority is concerned, the CNIL can be consulted on its website: <a href="https://www.cnil.fr/fr/saisir-la-cnil/contacter-la-cnil-standard-et-permanences-telephoniques">https://www.cnil.fr/fr/saisir-la-cnil/contacter-la-cnil-standard-et-permanences-telephoniques</a></p> <p>For all other European authorities, please consult the following link: <a href="https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm">https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm</a></p>

When MEDINCELL receives your Personal Data from our customers, partners or third parties and processes your Personal Data on their behalf, we do so as a processor. We have no control over the privacy and security practices and processes of our customers, partners or third parties. If your Personal Data has been submitted to us by a MEDINCELL customer, partner or third party and you wish to exercise any of the above rights, please contact the relevant customer directly.

## **10. INTERACTIVE FEATURES ON OUR WEBSITES**

To the extent that we offer public or group forums on our Products or services, such as news feeds, blogs, forums or similar tools ("**Interactive Features**"), any postings or comments you make may be public and viewed by others.

You should exercise caution before posting any information about yourself, including Personal Information. You confirm and agree that you have no expectation of privacy in the content you submit to the Interactive Features on the Products and Services. Except where required by applicable law, we assume no obligation to delete any Personal Data you post on our Products and services, and any disclosure of Personal Data you make via the Interactive Features is at your own risk.

## **11. LINKS TO OTHER WEBSITES**

Our Products or services may contain links to other websites, applications, products or services that are not owned or operated by MEDINCELL, such as social networking websites and applications like Facebook, LinkedIn and X. You should carefully review the privacy policies and practices of other websites, products and services, as we cannot control and are not responsible for the privacy policies, notices or practices of third-party websites, applications, products and services.

## **12. COOKIES AND TRACKING TECHNOLOGIES**

Depending on the country in which you reside, you can manage your preferences regarding cookies and other tracking technologies by using consent management tools available on our websites, applications and devices. This section applies to cookies and other tracking technologies. Here we explain what our use of cookies and other tracking technologies means for you, and how to disable tracking (for example, by using opt-in or opt-out preferences). Where we collect data that may enable us to identify you, the other sections of this Policy will apply.

### ***What are cookies?***

A cookie is a small file that a website asks your browser to store on your device in order to remember data about you, such as your language preferences or login details. These cookies, when placed by us, are called first-party cookies. We may also use third-party cookies, which are cookies from a domain different from that of the website you are visiting (for example, those used by social networks, instant messengers, CRM or marketing platforms, or advertising companies). For more information on cookies, cookie types and how to manage cookies, including how to block and delete them, please visit <https://allaboutcookies.org>.

We list below the main categories of cookies and other tracking technologies that we may use when you connect to our websites, use our web-based platforms, applications and devices, when you interact with us electronically or when you receive electronic communications from us. You can learn more about the purposes for which MEDINCELL may use these technologies in connection with your online use by consulting the following sections "Users of our websites, contact form and other inquiries" and "Users of Online Products and Services".

### ***What categories of cookies may MEDINCELL use?***

We generally use certain types of cookies during your session on our website ("session cookies"). To enhance your experience or remember your preferences or choices, we may use cookies that will remain on your device unless you delete them ("persistent cookies"). When using cookies on our websites and other digital services, this technology may include:

<b>Categories of cookies and tracking technologies MEDINCELL may use</b>	
<b>Strictly necessary cookies ("required")</b>	These cookies and tracking technologies enable our websites to function and improve the security of our website for your Online Use, for example when you need to authenticate yourself or use login features to access restricted parts of our websites.
<b>Performance cookies</b>	These cookies may allow MEDINCELL: <ul style="list-style-type: none"> <li>• to improve our websites;</li> <li>• remember language or other preferences when you browse; or</li> <li>• use other features on our websites, applications, platforms and devices to enhance your Online Experience.</li> </ul>
<b>Third-party cookies from social networks</b>	On some MEDINCELL websites, links to third-party social networks may, when you open them, deposit cookies to access your browsing history and collect information about your browsing path according to their own terms. You can access additional information by logging on to their s sites .
<b>Statistical cookies (Manoto)</b>	These cookies enable us to better understand how our websites are used, and to compile statistics on their use and visits (for example, information on each page visited, how long a user navigates on a particular page, how long it takes to download a particular page, what actions users take on each page (click, selection, etc.).

**Other tracking technologies**

When using third-party software or websites, mobile applications, devices, web platforms or through another Online Use, the technology may involve certain embedded tracking technologies. This may include the following:

- web beacons, web server data and similar technologies;
- tracking pixels, which we may include as images in the communications we send you. This may enable us to understand when you read the e-mail messages we send you, to send you more accurate and relevant content and to improve our communications with you. By using this technology, we may receive aggregated or anonymous information. In some cases, we may collect Personal Data about you which includes:
  - o location data (such as the city, region and location from which you opened your e-mail);
  - o your IP address;
  - o browser and device information: such as your mobile or desktop operating system (OS), email software type, device and user agent; or
  - o the time and date you open our electronic communications.
- other tracking tools that enable features such as remote interactions with you through instant messaging and other online features on our websites or third-party software we use for our business.

**Why do we use cookies on our website?**

In addition to the explanations provided in this Policy and in the section above, we use cookies or similar tracking technologies in various cases, including for the following purposes:

- **Making your experience more efficient, faster and easier:** by remembering your preferences, such as language, display and other preferred settings, by maintaining your session and for authentication purposes. This enables us to offer you a better user experience. These cookies are also known as session identification cookies, authentication cookies and user interface personalization cookies.
- **Obtain useful knowledge about how the site is used:** by collecting information about the number of visitors and other uses. This helps us to improve our sites. These cookies are also known as statistical cookies. For this purpose, we use the Matomo service. Similar service providers will also have access to this information (including your IP address and any other equipment identifiers such as IMEI number and MAC address).
- **Ensure easy access to our websites.** This enables us to direct you, to share our content with you on sites such as Facebook, X, LinkedIn, YouTube or to allow you to share content that interests you. To the extent that we use this technology, these "social network plug-ins" may store cookies and similar technologies on your computer or other device. This means that social networking sites may access this information (including your IP address) and may know that you have interacted with the MEDINCELL site.
- **To improve our marketing communications to you.** Some cookies, such as web beacons or tracking pixels, may be used by third-party systems such as customer relationship management systems or other service providers that help us manage email campaigns. These tracking tools enable us to better understand the success of our communications and the relevance of the content we share with you. This may enable us to reduce the number of e-mails we send you and to offer you content, scientific information or initiatives better adapted to your interests.

### ***How can you oppose or refuse cookies?***

Subject to specific provisions of the law of your country, in particular in the European Union, we will inform you, request your prior consent (consent / opt-in) before placing tracking technologies on your device, or grant you a right of opposition (opposition / opt-out) to the purposes we describe in this section. Your web browser, e-mail software (such as Microsoft Outlook or Google Gmail) and other clients you use may be configured to manage cookies and similar tracking tools, or even refuse them by default. Please remember that if you set your browser to automatically refuse cookies, your user experience when visiting websites may not be the same: your preferences may not be remembered, some functionality may be lost and you may not be able to access certain areas or features of the sites.

### **13. WHO TO CONTACT IF YOU HAVE ANY QUESTIONS OR WISH TO EXERCISE YOUR RIGHTS?**

If you have any questions concerning the Processing of your Personal Data or if you wish to exercise your rights with regard to the protection of Personal Data, you can contact the Data Protection Officer of the MEDINCELL Group at the following address or by e-mail: [dataprivacy@medincell.com](mailto:dataprivacy@medincell.com).

MedinCell - Data Protection Officer  
3 rue des Frères Lumière  
34380 JACOU France

In the event of a request to exercise one of your rights, you may be asked to provide proof of your identity. MEDINCELL does not keep a copy of this document after verification of your identity.

We will use reasonable efforts to respond promptly to your requests in accordance with applicable laws.

#### **14. POLICY UPDATE**

MEDINCELL may make changes to this Policy from time to time. In such cases, any changes will be indicated directly on this website (via pop-ups or other notification). In some cases, and if required by applicable law, we will send you an e-mail to notify you when this Policy is updated.

We recommend that you check this Policy regularly for any changes.

**APPENDIX 1**  
**LISTS OF MEDINCELL GROUP COMPANIES**

**MedinCell SAS**  
**MedinCell Inc.**