

Privacy Policy Business Contacts

1. Introduction

This Privacy Policy (the “Policy”) describes how Modus Therapeutics AB, reg. no 556669-2199 (“we”, “us” or “our”), at the address Sankt Eriksgatan 117, 113 43 Stockholm, Sweden, process personal data of our business contacts.

We safeguard your personal integrity. It is therefore important for us to protect your personal data and ensure that our processing of your personal data is correct and lawful. This Policy will help you understand what kind of personal data we collect and how it is used, as well as your rights as a data subject.

We may sometimes need to make updates or changes to this Policy. You can always find the latest version of this Policy on our website (please visit: <http://www.modustx.com/>).

We ask that you read this Policy carefully and familiarize yourself with its content. If you have any questions, please contact us at the address above or at info@modustx.com.

2. How we collect your personal data

We collect the personal data that you provide us with when you interact or otherwise communicate with us or in any other way provide us with your personal data, including if we come in contact with you personally or if we receive your personal data from third parties such as the company you represent.

3. How we process your personal data

In this section, we describe how we process your personal data, what legal grounds our processing is based on and for how long we store the data.

3.1 To create, maintain and develop potential business relationships

We process personal data to create and thereafter maintain and develop business relationships with potential investors, partners, clients and other business contacts (including for example suppliers).

If you are or represent a potential investor, partner, client or other business contact and we come into contact with you (either personally or by e-mail or other communications), we may process your personal data as follows.

Purpose	Processing	Categories of personal data
– To be able to contact you for the purpose of maintaining and developing our business relationship with you or the company you represent	<ul style="list-style-type: none"> – Storage of personal data in our business systems and back-up systems – Communication with you 	<ul style="list-style-type: none"> – Name – Contact details (such as e-mail address, telephone number, location and business address) – Professional role/title – Information regarding the company you represent
<p>Legal basis: Legitimate interest: The processing is necessary to fulfil our legitimate interest of creating and thereafter maintaining and developing a business relationship with you or the company you represent.</p>		
<p>Storage period: We store your personal data for a period reasonably required to maintain the relationship with you and/or the company/organization you represent in accordance with Section 3.2 below.</p>		

3.2 To maintain, administer and develop existing business relationships

We process personal data to maintain, administer and develop business relationships with existing investors, partners, clients and other business contacts (including for example suppliers).

If you are or represent an investor, partner, client or other business contact of ours, we process your personal data as follows.

Purpose	Processing	Categories of personal data
– To be able to contact you in your capacity as representative of our investor, partner, client or other business contact	<ul style="list-style-type: none"> – Storage of personal data, including communication and documentation, in our business and back-up systems – Communication with you 	<ul style="list-style-type: none"> – Name – Contact details (such as e-mail address, telephone number, location and business address) – Professional role/title – Information regarding the company you represent
<p>Legal basis: Legitimate interest. The processing is necessary to fulfil our legitimate interest of maintaining, administering and developing our business relationship with you or the company you represent.</p>		

Storage period: As long as necessary for the purposes above (or other legitimate purposes, such as fulfilling our legal obligations or exercising legal claims, see section 3.4). We erase or anonymize your data when it is no longer necessary or adequate, for example if our relationship with you or the company you represent ends.

3.3 To evaluate and improve our website

If you visit our website (<http://www.modustx.com/>), we collect and process information generated by your visit to analyze and produce statistical information regarding our web traffic in order to evaluate and improve our website and web-based communication.

Purpose	Processing	Categories of personal data
– To evaluate and improve our website and web-based communication	– Analysis and production of statistics regarding our web traffic and the use of our website	– Browser information – IP-address – Time zone from where you visited our web site – Other website traffic data
<p>Legal basis: Legitimate interest. The processing is necessary to fulfil our legitimate interest to evaluate and improve our website and web-based communication.</p>		
<p>Storage period: Only as long as necessary for the purposes above, and in most cases, the collected personal data is converted into aggregate data (anonymized data) within a shorter period of time, in connection with our production of statistical information.</p>		

3.4 To comply with our legal obligations or to exercise legal claims

We may process your personal data in order to comply with legal obligations set out in law or as decided by a court or other authorities. These requirements may be related to matters such as bookkeeping. The legal basis for our processing in this regard is that it is necessary for us in order to comply with legal obligations applicable to us.

We may also process your personal data if the processing is necessary for the establishment, exercise or defense of our legal claims.

4. How we share your personal data

The personal data that we collect is shared with the following types of third parties:

- a) Service providers: We use third party service providers to manage some aspects of our business operations. We share personal data with such third parties with regard to the IT systems and IT services we use and the companies and organizations we work together with in order to provide our

services. When we use such service providers or work together with other third parties we typically enter into data processing agreements, or make other relevant arrangements, to ensure that your personal data is only processed in accordance with this Policy.

- b) Authorities: When we are required by law, we may share your personal data with public authorities such as the police or tax authorities.

5. Where we process your personal data

We strive to always process your personal data within the EU and EEA. However, we may transfer your personal data to service providers who, either themselves or by their sub-contractors, are located in or have business activities in a country outside the EU or EEA. In the event of such transfer, it will be made in accordance with applicable data protection legislation, for example by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission or by use of standard contractual clauses that the European Commission has issued ensuring suitable measures to safeguard your rights and freedoms. For example, Microsoft, our provider of email and database systems, with servers both in the EU/EEA and in the US, is affiliated to the EU-US Privacy Shield.

6. Security measures

We have taken a number of security measures to ensure that the personal data we store is secure. For example, access to areas where personal data is stored is limited to our employees and service providers who require it in the course of their duties and who are informed of the importance of maintaining the security and confidentiality of the personal data we keep. We maintain appropriate safeguards and security standards to protect your personal data against unauthorized access, disclosure or misuse. We also monitor our systems to discover vulnerabilities in order to protect your personal data.

7. Your rights

7.1 Introduction

In this section we describe your rights under applicable data protection legislation. You are welcome to email us at info@modustx.com to exercise your rights or if you have any questions or comments regarding our processing of your personal data or this Policy. We will respond within a reasonable period of time upon verification of your identity.

7.2 Right of access and rectification

You have the right to information regarding which of your personal data we process and to access and rectify such personal data.

7.3 Right to erasure

You may request that we erase your personal data without undue delay in the following circumstances:

- a) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) you withdraw your consent on which the processing is based (if applicable) and there is no other legal ground for the processing;
- c) you object to our processing of personal data and we do not have any overriding legitimate grounds for the processing;
- d) the processed personal data is unlawfully processed; or
- e) the processed personal data has to be erased for compliance with legal obligations.

We may deny your request if we are prevented from erasing your personal data by requirements set out in applicable laws and regulations (e.g. in relation to accounting and tax legislation) or if it is needed for the establishment, exercise or defence of legal claims. If we cannot meet your request, we will instead restrict the personal data so they cannot be used for another purpose than the purpose preventing the erasure.

7.4 Right to restriction

You have the right to restrict the processing of your personal data in the following circumstances:

- a) you contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- b) the processing is unlawful and you oppose erasure of the personal data and request restriction instead;
- c) the personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defense of legal claims;
- d) you have objected to the processing of the personal data, pending the verification whether our legitimate grounds for our processing override your interests, rights and freedoms.

If your personal data has been restricted in accordance with this section they may, with exception of storage, only be processed for the establishment, exercise or defense of legal claims, or for the protection of the rights of a third party or for reasons of important public interest according to EU or EU member state legislation.

7.5 Right to object

You have the general right to object to our processing of your personal data when it is based on our legitimate interest. If you object and we believe that we may still process your personal data, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.

7.6 Right to data portability

If your personal data has been provided by you and our processing of your personal data is based on your consent or on the performance of a contract with you, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format in order to transmit these to another service provider where it would be technically feasible and can be carried out by automated means.

7.7 Right to withdraw consent

When our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Please note that the lawfulness of any processing based on your consent before its withdrawal is not affected by the withdrawal.

7.8 Right to file a complaint

You may at any time file a complaint with the supervisory authority Datainspektionen (www.datainspektionen.se) if you believe that our processing is performed in breach of applicable data protection legislation. Please note that you are also always welcome to contact us in such event.

8. The use of cookies

We use cookies on our website to enhance your website experience and to improve our website and services. A cookie is a small piece of data that our website asks your browser to store on your computer or device. We also use cookies for overall analytical information regarding your use of the company's services. You have the option to change the settings in your browser for the use of cookies. You have, for instance, the ability to adjust your settings to block all cookies or delete them when you close your web browser.