

## **TILT Biotherapeutics' Privacy Policy**

### **1. Introduction**

This privacy policy is effective as of 5 March 2020 and describes how TILT Biotherapeutics Ltd (hereinafter "**TILT**" or "**we**") collects and processes personal data of:

- our suppliers and other business contacts,
- cooperation partners such as researchers,
- other interest groups or stakeholders, including but not limited to shareholders, option holders, other funding organizations,
- as well as users of our website (hereinafter jointly referred to as "**you**").

This privacy policy will be regularly updated to reflect any changes in the way we handle your personal data or any changes in the applicable laws.

TILT respects your privacy and is committed to protect and process your personal data in accordance with this privacy policy and applicable laws including the General Data Protection Regulation (2016/679; the "**GDPR**") and other applicable data protection laws. On this page, we tell you, how we collect and use your personal data and what rights you have in relation to the processing of your personal data.

As a biopharmaceutical company TILT conducts clinical trials as the sponsor, and in such context personal data of study patients will be processed. TILT, the clinics, principal investigators and clinical research organizations participating in the studies have separate privacy documentation and patient information packages in place for the processing of personal data in the context of the clinical trial in question, and processing of patient data is not governed by this general privacy policy.

TILT has also separate privacy policies for employee and recruitment data.

### **2. The purposes and legal basis for our processing of personal data**

The **purpose** of processing your personal data is:

- to prepare for and implement our contractual relationships and to interact with our business partners, consultants and other stakeholders;
- to manage our clinical trial activities, including interactions with healthcare professionals, such as researchers, study groups and clinical research associate, participating in clinical studies or otherwise collaborating with TILT;
- to report adverse events and to provide medical information on our products (name and contact details of the healthcare professionals contacting us);
- to manage TILT's funding, investor and other stakeholder relations as well as obligations arising therefrom;

- to maintain the shareholder register;
- to respond to questions and other contact requests received through our website or by using cookies. (Cookies provide statistical information on the movements of the website users and their use of particular website pages and enable services to be provided efficiently. You may at any time turn the cookies option off in your internet browser. However, turning the cookies option off may cause difficulties in using the services.)

The **legal basis for processing your personal data** may be

- either *fulfilment of an agreement* concluded between TILT and you/your organization;
- TILT's *legitimate interests* consisting of managing and developing TILT's other stakeholder relationships, business functions and communications; and
- fulfilling reporting or other *legal obligations* towards authorities or stakeholders (e.g. maintaining shareholder register; reporting on adverse events).

### 3. What personal data we process and where we collect the personal data from?

The personal data that we collect and process may include the following data:

- **Basic name and contact information:** your name, title, address, phone number, email as well as date of birth and social security code where necessary etc.

If you act on behalf of a company, contact information of the company such as company address and your position in the company.

If you are a researcher, additionally other information that is relevant for the research you are engaged in (e.g. CVs).

- **Shareholder information:** name, contact information and number of TILT shares.
- **Information related to marketing:** such as data related to your preferences to be contacted by us, your possible consent or prohibition to receive newsletters or other marketing material from us, cookie data etc.

The personal data we process is mainly collected directly from you, the data subject. However, personal data may also be collected from your employer or colleagues. In some cases, for the purpose of confirming your current professional position, your personal data may be supplemented by information retrieved from publicly available sources such as via search engines, sector specific newsletters, social media and your employer's website.

### 4. Are your personal data disclosed or transferred to third parties?

We will not disclose your personal data to any third parties unless we are required to do so under applicable laws or to perform services requested by you. For example, under applicable laws, information on researchers participating in our clinical studies and other stakeholders may need to be disclosed to authorities on their request, for their performance of tasks carried out in the public interest, including authorities' supervision of pharmaceuticals in the EU and other territories, such as the FDA in the USA.

We primarily process personal data on servers located in the EU/EEA. However, we may need to transfer your personal data outside the EU/EEA. Where this is the case, we and our third party processors will implement appropriate technical and organizational measures under the GDPR to ensure that your personal data remains always secure.

We regularly use processors for the technical, commercial or operative implementation of data processing and your personal data may be transferred to and processed by such third party providers, which perform services for us to enable them to perform such services. For example, we currently use *e.g.* [Springvest](#) dashboard for the processing of shareholders' personal data.

## 5. Principles of data security and retention

TILT will only process your personal data for the purposes for which it was collected as set out above. Processing of your personal data in a secure way is important to us. TILT has implemented appropriate technical and organizational measures to keep your personal data secure. TILT maintains a report of the personal data on a separate, limited-access server. Access to the personal data is limited to only those personnel needing them in their work and viewing of personal data requires an individual, protected user ID and password. We will keep your personal data confidential and not disclose it to any other entities than those set out in this privacy policy, unless you clearly authorize us to do so, or such an authorization results from applicable laws.

Your personal data is stored only for as long as and in the extent that it is necessary for the purposes for which the personal data was collected as set out above unless a longer retention period is required or permitted by the applicable laws.

## 6. What are your rights as the data subject?

You may at any time exercise your rights as a data subject in relation to your personal data that we process. Your rights include the following:

- **Right to access and rectification:** You have the right to request access to your personal data we process. This includes *e.g.* the right to be informed whether or not we process personal data relating to you, what personal data is being processed and the purpose for the processing. You also have the right to request inaccurate or incomplete personal data about you to be corrected.
- **Right to object:** You have the right to object to certain processing of your personal data including *e.g.* processing of your personal data for marketing purposes or when we otherwise base our processing of your personal data on a legitimate interest of ours or a third party.
- **Right to erasure:** You have the right to request your personal data be erased if, for example, the personal data is no longer necessary for the purposes for which it was collected, the processing is unlawful, or the personal data has to be erased to enable us to comply with our statutory obligations.
- **Right to data portability:** If your personal data that you yourself have provided is being processed automatically with your consent or in accordance with a contract between you and TILT, you may request the personal data to be provided to you in a structured, commonly used and machine-readable format and the personal data to be transmitted to another controller, if this is technically possible.

- **Right to withdraw your consent:** In cases where the processing is based on your consent, e.g. for marketing purposes, you have the right to withdraw your consent to such processing at any time.

You may exercise any of the above-mentioned rights by contacting us by email at [privacy@tiltbio.com](mailto:privacy@tiltbio.com).

Our aim is always to solve disagreements relating to the processing of your personal data directly with you. However, if you wish to file a complaint with a competent data protection authority regarding our processing of your personal data, you may do so by contacting the authority. In Finland the supervisory authority is the the Data Protection Ombudsman (*Tietosuoja-valtuutetun toimisto*) ([tietosuoja@om.fi](mailto:tietosuoja@om.fi), 029 56 16670, [www.tietosuoja.fi](http://www.tietosuoja.fi)).

## 7. Contact us

TILT is the controller of your personal data for the purposes described in this privacy policy. If you have any questions about this privacy policy or concerns about how we process your personal data, or would like to receive further information, please contact us at any time by email at [privacy@tiltbio.com](mailto:privacy@tiltbio.com).