



PRIVACY POLICY FOR DICOT PHARMA AB

DICOT PHARMA AB SAFEGUARDS YOUR PERSONAL INTEGRITY

DICOT PHARMA AB (publ), corp. reg. no. 559006-3490, S:t Olofsgatan 11A, 753 21 Uppsala, (the "**Company**") respects your privacy and is committed to maintaining a high level of security and integrity regarding your personal data. The Company is also committed to ensuring that processing is carried out in accordance with applicable data protection legislation.

This Privacy Policy describes how the Company processes personal data about you in your capacity as, or as a representative of a company that is, a partner, supplier, or a potential supplier to the Company. It also describes how the Company processes personal data about you who are interested in the Company's business, who visits our website and who are applying for employment with us. Further, this Privacy Policy describes how the Company processes personal data about you as a shareholder or as a representative of a shareholder or as a holder or a representative of a holder of other financial instruments that can be converted to or that entitle to subscribe for shares in the Company ("**Shareholder**").

Do not hesitate to contact us should you have any questions regarding the Company's privacy protection. The Company's contact information is set out under the section "Contact Information".

CONTROLLER

The Company is the controller of your personal data and is therefore responsible for ensuring that your personal data is processed correctly and securely in accordance with applicable legislation.

The Central Securities Depository is the controller of the personal data in the central securities depository register.

WHICH PERSONAL DATA DOES THE COMPANY PROCESS?

Personal data means any information that directly or indirectly relates to a natural, living person. Accordingly, personal data is information about you and your person, e.g., your name, your contact information, pictures of you and your IP-address.

Processing means any operation which is performed on personal data, such as collection, storage, use, adaption, or disclosure.

Suppliers and partners

The Company collects and stores the following information about you that the Company needs to contact you and to fulfil its undertakings toward you as a supplier or partner or as a representative for a supplier or a partner.

- Personal information and contact information, such as name, personal identity number, address, telephone number, e-mail address, title, position, and employer.
- Information that you provide to the Company by e-mail, via the Company's social media or by other channels of communication.
- Where applicable, information regarding phone calls with the Company's switchboard or customer service.
- Where applicable, information regarding dietary preferences, potential allergies and/or disabilities (e.g., in connection with corporate events or meetings).

Potential suppliers and partners and company representatives for potential suppliers and partners

The Company may collect and store the following information about you in your role as a potential supplier or partner to the Company or in your role as a representative for a company that is a potential supplier or partner to the Company. The Company needs such information to contact you and to fulfil its undertakings toward you as a potential supplier or partner or in your capacity as a representative for a potential supplier or partner.

- Personal information and contact information, such as name, address, telephone number, e-mail address, title, position, and employer.

Visitors of the Company's website

In connection with visits to the Company's website, the Company collects the following information about you that the Company needs to be able to improve, streamline, simplify and develop its website.

- Technical data, such as IP address, MAC address, URL, unique device ID, network and device performance, browser, language and identification settings, geographic location, operating system, other information from cookies or similar mechanisms (device information).

People with interest for the Company's business

If you ask questions to the Company about its business, it may collect the following information about you to answer your questions.

- Personal information and contact information, such as name, address, telephone number and e-mail address.

Recruitment (job applicants at the Company)

The Company collects and stores the following information about you that the Company needs to be able to recruit the right persons for positions within the Company.

- Personal information and contact information, such as name, address, telephone number, e-mail address, title, position, and employer.
- Information in cover letter and CV.
- Where applicable, your picture.
- Other information that you provide the Company in connection with recruitment.

Shareholders

The Company collects and stores the following information about you in your role as a Shareholder in order to fulfil the Company's undertakings and ensure the Shareholders' rights.

- Personal information and contact information, such as personal identification number, name, address, telephone number, e-mail address, and position.
- Holdings of shares or other financial instruments.
- Financial information, e.g., information regarding voting rights at general meetings of shareholders, shareholding and rights relating to the ownership.
- Information regarding proxies representing Shareholders, where applicable.
- Information regarding trustees, pledges, and pledgees, where applicable, and other notes in the share register / central securities depository register.
- Other information that has been provided by you or the organisation that you represent or that is comprised by the information the Company gets from the Central Securities Depository.

Trial participants

Personal data, including sensitive health data, collected in clinical trials will be stored in a register and data processed for the purpose of the trial. In data processing, name and social security number will be replaced with a unique trial participant code. The Company will not have access to the code key. The encoded personal data will be transferred to the Company, which will handle the data in its capacity as data controller, in order to comply with applicable legal requirements. Coded personal data may also be transferred to regulatory authorities for their assessment of the safety and efficacy of the Company's candidate drug. Regulatory authorities process the data in their capacity as controllers.

The encoded personal data may also be disclosed to parties working on behalf of the Company, such as laboratories for sample analyses.

The Company will via its (Personal Data) Processor collect and store the following information about you that the Company needs to be able to conduct its clinical trials.

- Personal information and contact information, such as personal identification number, name, address, telephone number, e-mail address, and position.
- Sensitive personal data (health data) will be processed, e.g., weight, health status, blood values and medical history.
- Information of all activities related to participation in the clinical trial program, such as medical exams, interviews, etc.

With respect to customers, suppliers, and partners (or potential ditto) and company representatives for such parties, your personal data is usually collected from the company or organisation that you represent, but also, in certain cases, directly from you, e.g., by e-mail, our social media or other channels of communication or in connection with events or meetings. The Company may also receive personal data about you from other partners of the Company. The Company may also use external information services to supplement existing data, e.g., with your position and contact information.

With respect to visitors of our website, people with interest for our business and job applicants, your personal data may be provided to the Company directly from you or from the staffing agency, recruitment company or hiring company through which you apply for work.

THE COMPANY'S PROCESSING OF YOUR PERSONAL DATA

The purposes for which we intend to process your personal data and the legal basis for the respective processing activities are stated in the tables below.

Suppliers and partners (including company representatives)

Purpose	Legal basis
To be able to keep in touch with the supplier or the partner (e.g., in connection with the delivery of goods or services).	The processing is necessary for the performance of the agreement with the supplier or partner.
To be able to keep in touch with a representative of a supplier or partner (e.g., in connection with the delivery of goods or services).	The processing is necessary for the Company's legitimate interest to keep in touch with you to fulfil its obligations under the agreement with its supplier or partner, i.e., the company that you represent (legitimate interest).
To fulfil legal requirements, e.g., security requirements and accounting requirements.	The processing is necessary for compliance with the Company's legal obligations.
To enable marketing and communication about the Company's brand and the Company's products (e.g., mailing of newsletters and other marketing materials, invitations to the Company's events, meetings, and other gatherings etc.).	The processing is necessary for the Company's legitimate interest to market its brand, its products, and other similar products to you as a supplier or partner or to the company that you represent (legitimate interest).

Potential future suppliers or partners

Purpose	Legal basis
To enable marketing and communication about the Company's brand and the Company's products (e.g., mailing of newsletters and other marketing materials, invitations to the Company's events, meetings, and other gatherings etc.).	The processing is necessary for the Company's legitimate interest to market its brand, its products and other similar products to you or to the company that you represent (legitimate interest).

Visitors of the Company's website

Purpose	Legal basis
To ensure the operation of the Company's website and application. To be able to develop the Company's website and to better adapt the website based on how it is used.	The processing is necessary for the Company's legitimate interest to improve, streamline, simplify and develop its website (legitimate interest).

People with interest for the Company's business

Purpose	Legal basis
To be able to answer questions about the Company's business such as questions about participation in coming studies.	The processing is necessary for the Company's legitimate interest to provide information about the Company's business to interested parties (legitimate interest).

Recruitment (job applicants at the Company)

Purpose	Legal basis
To, in connection with recruitment, be able to decide who is best suited for a position within the Company and to ensure that the relevant person has the necessary skills.	The processing is necessary for the Company's legitimate interest to recruit the right employees and ensure that skilled people work for the Company (legitimate interest).

Shareholders

Purpose	Legal basis
To fulfil the Company's obligations to you as a Shareholder according to the Company's articles of association.	The processing is necessary to fulfil the Company's contractual obligations to you in accordance with the articles of association (performance of agreement). Regarding representatives of Shareholders, the processing is necessary for the Company's legitimate interest in fulfilling its contractual obligations towards its Shareholders (legitimate interest).
To fulfil the Company's obligations to you and other Shareholders in accordance with the Swedish Companies Act or other applicable legislation or pursuant to the Company's listing agreement.	The processing is necessary to fulfil the Company's legal obligations under the Swedish Companies Act or other applicable legislation (legal obligations). Regarding representatives of Shareholders, the processing is necessary for the Company's legitimate interest in fulfilling its contractual obligations towards its Shareholders (legitimate interest).
Distribution of shareholder-related information	The processing is necessary in order for the Company to be able to inform Shareholders and other stakeholders in a timely and correct manner about information relevant to the Company (legitimate interest).

HOW LONG DOES THE COMPANY STORE YOUR PERSONAL DATA?

Your personal data is stored as long as there is a need to preserve them in order to fulfil the purposes for which the data was collected in accordance with this Privacy Policy. Thereafter, your personal data will be deleted.

Some personal data will, for the purpose of complying with applicable accounting legislation, be stored for seven years, counting from the end of the calendar year during which the financial year, to which the information pertained, was terminated.

Contact information regarding company representatives is stored during such time the Company considers that the information is necessary to maintain the relationship with the company/organisation. Deletion shall take place when the Company becomes aware that the information is no longer adequate or relevant for the purpose, or at the request of the contact person.

For more information about how long the Company stores specific personal data, please contact the Company. Contact information is provided under section "Contact" below.

WITH WHOM DOES THE COMPANY SHARE YOUR PERSONAL DATA?

The company does not disclose personal data to third parties, except when necessary to fulfil a legal obligation or to fulfil the Company's obligations to you, customers and/or partners. Your personal data will not be sold to third parties for marketing purposes.

Situations when your personal data may be disclosed to third parties are listed in the table below.

Third party	Reason for third-party disclosure
Suppliers of cloud solutions	Personal data may be transferred to suppliers of cloud solutions since the Company stores certain information in cloud solutions.
Suppliers and partners	The Company may disclose your personal data to suppliers and/or partners, if the suppliers and/or partners need your personal data to fulfil their undertakings toward the Company.
Authorities	Personal data may be disclosed to authorities when necessary for compliance with the Company's legal obligations.
Sale	If the Company intends to transfer all or part of its business, personal data may be disclosed to a potential buyer.
The public	The Company's share register is public and held available at the Company for anyone who wishes to take part of it. The information contained in the share register is therefore disclosed upon request.

	Minutes and voting lists from the general meetings of shareholders may be disclosed to the Shareholders present at the meeting as well as to the Swedish Companies Registration Office, auditors, and others to whom the Company has a legal obligation to disclose the minutes or otherwise considers it appropriate to disclose the minutes. In addition to this, minutes, excluding the voting lists, may be published on the Company's website. Information on e.g., major Shareholders may be disclosed to authorities, advisors, and the public in connection with the preparation of prospectuses, information memoranda and financial reports.
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TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

The Company may transfer your personal data to countries outside the EU/EEA. If personal data is transferred to a country outside the EU/EEA, the Company will take measures to ensure that the personal data continues to be protected and will also take the necessary measures to ensure a legal transfer of the personal data to countries outside the EU/EEA.

SOCIAL MEDIA

Regarding personal data that occurs and is processed on social media, such as Facebook, Instagram, Twitter, YouTube, and LinkedIn, we refer users to the policy provided by the respective service providers for information on how each service provider processes personal data. In the Company's view, the purpose of the processing is that representatives of existing and potential customers and partners to the Company shall be able to interact and maintain contact with the Company via social media, to contribute to good relationships with customers and partners and to make the Company's customer service and product widely accessible through several different channels. The processing is necessary for the purposes of the Company's legitimate interest to market its brand and its products to existing and potential customers and to partners (legitimate interest).

YOUR RIGHTS

A summary of your rights according to applicable legislation is set out in the table below.

Right of access	You have the right to access your personal data and to obtain a copy of the personal data concerning you that is processed by the Company.
Right to rectification	If the personal data concerning you that is processed by the Company is inaccurate, incomplete, or outdated, you have the right to obtain rectification of such personal data.
Right to erasure	You have the right to request the erasure of personal data concerning you. Unless the Company has a legal basis to

	continue the processing of the personal data concerning you, such personal data shall be erased.
Right to object	Under certain circumstances you have the right to object against the Company's processing of your personal data.
Right to restriction of processing	Under certain circumstances you have the right to obtain restriction of the processing of your personal data. Where processing has been restricted, the Company may only under certain circumstances carry out other processing activities concerning the personal data than storage.
Right to data portability	Where your personal data is processed based on your consent or on a contract with you, you have the right to receive the personal data concerning you in a machine-readable format and request that those data are transmitted to another controller.
Right to lodge complaints with a supervisory authority	You have the right to lodge complaints concerning the Company's processing of the personal data concerning you to the Swedish Authority for Privacy Protection, Box 8114, SE-104 20 Stockholm.

SECURITY OF YOUR PERSONAL DATA

You should always be able to feel safe when you provide us with your personal data. Therefore, the Company has implemented the security measures that are necessary to protect your personal data against unauthorised access, alteration, and destruction. The Company will not disclose your personal data, other than as expressly provided by this Privacy Policy.

COOKIES

The Company uses cookies.

IF YOU DO NOT SHARE YOUR PERSONAL DATA WITH THE COMPANY

If you do not share your personal data with the Company, the Company will not be able to fulfil its legal or contractual obligations towards you. For Shareholders, this means that you will not be able to exercise your rights as a Shareholder, including attending and voting at general meetings.

CHANGES

The Company reserves the right to change this Privacy Policy at any time. In the event of changes to this Privacy Policy, the Company will publish the amended Privacy Policy on its website with information on when the changes will come into effect and may also notify customers and partners in an appropriate manner.

CONTACT INFORMATION

Do not hesitate to contact the Company if you have any questions about this Privacy Policy, the processing of your personal data or if you wish to exercise your rights under this Privacy Policy or applicable legislation.

Dicot Pharma AB

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