	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 1 OF 25
	REVIEW DATE: 24/08/2021		

GLOBAL INFORMATION PRIVACY POLICY

The purpose of this Personal Data Processing Policy (hereinafter the “Policy”) is to set forth and inform the Personal Data processing made by Khiron of people who have provided said information such as patients, suppliers, customers, health care professionals and employees of Khiron, as well as to disseminate and protect the rights of the holders of such Personal Data. This policy sets out the minimum requirements to ensure an adequate level of protection within Khiron for the collection, use, disclosure, transfer, storage, and other Personal Data processes.


1. KHIRON AND OF THIS POLICY:

Khiron Life Sciences Corp, a company based in Toronto, Ontario, Canada, acts globally through its local subsidiaries in various jurisdictions around the world. Whenever used in this document, the term “Khiron” refers to the conglomerate of companies, without such term entailing a group of companies as defined in the legislation of different countries. This is a global policy, but in the last section hereof you will find the particularities applicable to your jurisdiction and in compliance therewith. In case there is any conflict between this Policy and the particular provisions of a country, the latter shall prevail.

For the purposes of this Policy, the following definitions shall apply:

- *Authorization: Prior, express, and informed consent of the Data Subject to carry out the Processing of Personal Data.*
- *Databases: Organized set of personal data subject of processing.*
- *Personal Data: Any personal information linked to or that can be associated with, one or more determined or determinable natural persons.*
- *Sensitive Personal Data: Personal data that affects the privacy of the Data Subject or whose misuse may lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership of social or human rights organizations or promoting the interests of any political party, as well as data concerning the health or medical condition of the person or caregiver, sex life and biometric data.*
- *Data processor: Natural or legal person, public or private, who, by themselves or in association with others, carries out the processing of personal data on behalf of the data controller.*
- *Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.*
- *Data subject: Natural person whose data is subject to processing.*
- *Data controller: Natural or legal person, public or private, that by themselves or in association with others decides on the data base and/or Processing of the Data, being in this case Khiron.*

PRODUCED BY	REVIEWED BY	APPROVED BY
Name: Angela Acosta	Name: Livia Maduri	Name: Board of Directors
Position: Legal Leader	Position: General Counsel	Position: Board of Directors
Date: 24/08/2021	Date: 24/08/2021	Date: 24/08/2021

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 2 OF 25
	REVIEW DATE: 24/08/2021		

Khiron’s ethics code emphasizes the company’s commitment to privacy and personal data protection. This Policy shall be applied to all databases and/or files containing Personal Data subject to processing by Khiron and shall apply to all communication and interaction channels that Khiron may use and wherein Personal Data is collected, i.e., sensitive data, personal data, trade and/or administrative data, among others.

2. LEGAL BASES AND GUIDING PRINCIPLES

Data Subject’s Personal Data is processed only when the Data Subject has granted consent, and only to fulfill the specific purposes and legitimate interests for which the data has been required.


During the Processing of Personal Data and Sensitive Personal Data, Khiron shall comply with the following guiding principles of data protection: (i) legality; (ii) purpose; (iii) freedom; (iv) truthfulness; (v) transparency; (vi) access and restricted circulation; (vii) security; and (viii) confidentiality.

Personal Data shall only be processed for a period of time that is both reasonable and necessary, in accordance with the intended purposes, in compliance with the provisions applicable to the matter in question (e.g. administrative, accounting, tax, legal and historical aspects of the information). Once the purpose or purposes of the processing have been fulfilled, Khiron shall proceed to delete the Personal Data in its possession, subject to the possibility of keeping those required for the fulfillment of a legal or contractual obligation or the enforcement of legal rights.

Personal data shall be processed under high standards of security and confidentiality, using the data exclusively for the purpose described in the corresponding privacy notice and complying with the requirements of applicable regulations.

Khiron shall provide the reasonable physical, technical, human, and administrative measures to protect the records, avoiding their adulteration, loss, consultation, unauthorized or illegal use, disclosure or access. Khiron does not guarantee the total security of the Data Subject’s information nor shall it be liable for any consequences arising from technical failures or improper entry by third parties into the database or file where the Personal Data being processed by Khiron and its data controllers are stored. Khiron shall require all third parties, including its contractors with whom it exchanges information, to adopt and comply with the appropriate physical, technical, human, and administrative measures for the protection of the Personal Data in relation to which such third parties act as data controllers.

3. PASSIVE COLLECTION OF INFORMATION

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 3 OF 25
	REVIEW DATE: 24/08/2021		

By accessing or using services on Khiron websites, Khiron may passively collect information (collected without you directly providing the information) on the Data Subject's computer hardware and software, the Data Subject's IP address, browser type, operating system, domain name, access times and referring website addresses through the use of information technology such as cookies. No Personal Data of users is directly collected with those tools. Information will also be collected from the pages most frequently visited by the user on those websites to learn about their browsing habits. However, the user of Khiron websites may configure the operation of the cookies, according to their internet browser options.

Khiron and our third-party service providers passively collect and use information in different ways, as listed below:


Via the Data Subject's browser: Some information is collected by most browsers, such as the Data Subject's Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version, and Internet browser type and version. Khiron may collect similar information, such as the Data Subject's device type and identifier or whether you access the site via a mobile device.

Use of cookies: Cookies represent a compilation of information stored directly on the computer you use. Cookies allow us to collect information such as browser type, time spent on the site, pages viewed, and language preferences. Khiron and our service providers use the information for security purposes, to make navigation easier, to display information more efficiently and to customize your experience when navigating the site. Khiron also uses cookies to recognize your computer or device, thus making it easier for you to use the site. Moreover, Khiron uses cookies to obtain statistical information about site usage to continually improve the design and functionality of the site, to understand how people use the site, and to help us answer questions about the site.

You can refuse to accept these cookies by following your browser's instructions; however, such refusal may make you experience some troubles when using the site. For further information about cookies, please visit www.allaboutcookies.org.

Use of pixel tag, web beacon, Clear GIFs or other similar technologies: These may be used in connection with certain pages of the site and HTML-formatted emails to, among other things, track the actions of site users and email recipients, measure the success of our marketing campaigns and compile statistics on site usage and response rates.

Online Behavioral Advertising: The use of cookies, web beacon, pixel tags, clear GIFs or other similar technologies allows our third-party providers to display ads about our products and services when

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 4 OF 25
	REVIEW DATE: 24/08/2021		

you enter the site or other websites or web properties over the Internet. These providers may place web beacon, clear GIFs or similar technologies on the site and other websites or web properties and may also place or recognize third party cookies when you enter the site or other websites or web properties. They may use information of your visits to the site and other websites or web properties to display advertisement about goods and services that may be of your interest.

IP Address: The IP address is a number that the Data Subject's Internet Service Provider (ISP) automatically assigns to the computer you are using. An IP address is identified and automatically recorded in our server log files when a user enters the site, along with the time and the page(s) visited. The collection of IP addresses is a common practice on the Internet and is performed automatically by many websites. Khiron uses IP addresses for purposes such as calculating site usage levels, helping diagnose server problems and administering the site.


Device Information: Information about the Data Subject's mobile device may be collected, such as a unique device identifier.

4. TREATMENT AND PURPOSE

Khiron, acting as the Personal Data Controller, for the proper development of the activities set forth in its corporate purpose, collects, stores, uses, circulates, deletes, processes, compiles, reproduces, exchanges, updates, arranges, communicates and transmits to third countries, as the case may be, Personal Data of persons with whom it has or has had a relationship.

The general purposes for which Khiron processes the Personal Data include, but are not limited to, the following:

- a) Carry out activities related to Khiron's corporate purpose in each jurisdiction.
- b) Carry out trade and marketing activities, including research to develop and improve all or some of our products and services.
- c) Send important information about the Data Subject's relationship with Khiron, as well as products, campaigns, events, about Khiron websites or digital initiatives, modifications of Khiron's terms, conditions and policies and any other administrative information.
- d) Follow up activities, management of actions, identification of opportunities, quality of products and services, for administrative, organizational, academic, scientific, and research purposes, reporting obligations established by law or by Codes of Ethics.
- e) Comply with legal obligations, judicial, contractual or any other type of proceedings.
- f) For business purposes, such as data analysis, market research, audits, development of new products, improvement of the website, improvement of Khiron products and services,

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 5 OF 25
	REVIEW DATE: 24/08/2021		


identification of site usage trends, customizing clients experience on Khiron websites by presenting products and services and determining our promotional campaigns' effectiveness.

- g) Respond to your queries and attending to your requests, as well as sending documentation you request or alerts by e-mail.
- h) Follow up and process product and/or service quality complaints and adverse events reports.
- i) Manage and administer Khiron's Human Resources, payroll, benefits and other compensations programs
- j) Share, transfer and transmit your Personal Data within the conglomerate of companies referred to by the term Khiron and with internal third parties.
- k) Share your Personal Data with our external service providers or contractors who provide services such as website hosting and moderation, mobile application hosting, data analysis, payment processing, order fulfilment, infrastructure provision, IT services, customer service and logistic operations, email and direct mail delivery services, credit card processing, customer and supplier analysis, audit services and other services, in order to enable them to provide the services.
- l) Share your Personal Data with a third party in case of reorganization, merger, sale, spin-off, joint venture, assignment, transfer or other disposition of all or part of our business, assets or shares (including acts related to any bankruptcy or similar proceedings), as well as any change in Khiron's corporate or administrative structure.
- m) Respond to requests from public and government authorities, including public and government authorities in your country of residence and abroad.
- n) Enforcement of Khiron's rights.
- o) Protect our operations.
- p) Protect our business, rights, privacy, security, or assets, among others.
- q) In overall, to manage our relationship with you as a Personal Data Subject.
- r) For any other legitimate authorized purpose.

5. DATA TRANSFERS

Khiron may transfer your Personal Data to internal and external third parties in carrying out its corporate purpose and to fulfill the purpose you have authorized.

In such cases, Khiron signs a transfer of Personal Data contract with the determined third party, whereby the third parties are required to keep the information confidential, secure and to use it

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 6 OF 25
	REVIEW DATE: 24/08/2021		

only to carry out/provide the activities and/or services set out in the data transfer contract or in the document containing the contractual relationship to be executed.

INTERNATIONAL DATA TRANSFER

Your personal information may be processed locally in the country where you work or reside or in any other country where Khiron is present, as permitted by law.

In case your personal information is to be transferred outside the European Economic Area or another country banning transfers of personal information, Khiron applies the European Commission's standard contractual terms or any other transfer mechanism in accordance with local rules, such as consent, to ensure that your personal information is kept at an appropriate or similar level of protection to that employed in your home country.


Notwithstanding the foregoing, please note that if the applicable local jurisdiction so permits, Khiron may transfer your Personal Data to another country without your consent in the following instances:

- a) When an exchange of medical data takes place, when required for the Data Subject's treatment or for reasons of public health or hygiene;
- b) Cases of bank or stock exchange transfers, according to the legislation applicable thereto;
- c) Transfers that are made pursuant to international treaties signed by Colombia, based on the principle of reciprocity;
- d) When it is required to make legally mandatory transfers to protect the public interest, or to recognize, exercise or defend a right in legal proceedings; and
- e) When it is necessary in the performance of a contract entered by and between the Data Subject and Khiron, including a contract of employment, or for the execution of pre-contractual measures, as long as it is authorized by the Data Subject.

6. DATA SUBJECTS' RIGHTS

Below you may find a description of your rights as the owner of the Personal Data processed by Khiron:

- a) Consult, update, include, correct, rectify, and/or delete Personal Data subject to Processing by Khiron, as well as revoke, limit, or contest the authorization of Processing, at any time and at no cost;
- b) Request proof of authorization given to Khiron for the Processing of Personal Data;
- c) Be informed by Khiron, upon request, about the use Khiron has made of your Personal Data;

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 7 OF 25
	REVIEW DATE: 24/08/2021		

- d) File before the corresponding authorities in each country actions for violations of the provisions of the respective law on protection of personal data and other provisions that amend or supplement it;
- e) Revoke the authorization and/or request the deletion of the Personal Data and/or Sensitive Personal Data; and
- f) Access free of charge to your Personal Data and/or Sensitive Personal Data that have been processed.

PROCEDURE TO EXERCISE RIGHTS


You can consult, update, correct, rectify, and/or delete your Personal Data subject to Processing by Khiron, as well as revoke, limit or contest the authorization of Processing, at any time and free of charge.

For such purpose, you must send a detailed communication of your request to Khiron’s Personal Data Protection Officer at the physical addresses set out in the “Specific Privacy Provisions by Country” section hereof, or in the emails set out therein. All physical communications sent to Khiron shall include an email or physical address so that the company can respond to the request.

Remember that these rights can only be exercised by: (i) the Data Subject, who must sufficiently prove their identity; (ii) the Data Subject’s assignees (e.g. heirs, successors), who must prove such capacity; (iii) the Data Subject’s legal representative and/or attorney-in-fact, prior accreditation of the representation or attorney-in-fact; and (iv) a third party when it is the result of a provision in favor of someone else or for someone else, subject to prior accreditation thereof.

Khiron may only deny access to Personal Data, or revoke authorization, or request data deletion when (i) the applicant is not the Data Subject, their assignees (e.g., heirs, successor) or the legal representative is not duly accredited to do so; (ii) the applicant is not a public or administrative entity in the exercise of its legal functions, or there is no court order; and (iii) the Data Subject has a contractual duty to remain in the database or, if applicable, a legal duty.

For requests: they will be responded within a maximum of ten (10) working days from the date of receipt thereof. If the law expressly sets forth a shorter time in the Data Subject’s jurisdiction, such time shall be met. When the consultation or request may not be responded within said term, you will be informed of the reasons for such delay and the date in which Data Subject’s consultation or request will be responded, such date in no case may exceed five (5) working days following the expiration of the first term.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 8 OF 25
	REVIEW DATE: 24/08/2021		

For more than one request per calendar month, Khiron shall only charge the Data Subject for the costs of shipping, reproduction and, where appropriate, certification of documents. The reproduction costs may not exceed the cost of recovering the corresponding material.

For complaints or claims: if they lack information, you will be required within five (5) working days of receipt thereof to provide the missing information. If upon two (2) months elapsing from the date of the request the applicant has failed to submit the required information, the claim shall be deemed to have been withdrawn. If the complaint or claim information is complete, a legend will be included in the database stating “claim in process” and the reason for it, in no more than two (2) working days. Such legend shall be maintained until the claim is resolved.


The maximum term for resolving complete claims shall be fifteen (15) working days from the day following the date of receipt thereof. If the law expressly sets forth a shorter time in the Data Subject’s jurisdiction, such time shall be met by Khiron. For claims not resolved within that time, the interested party shall be informed of the reasons for the delay and the date by which the claim shall be resolved, which in no case may exceed eight (8) working days following the expiration of the first term.

7. SENSITIVE PERSONAL DATA AND MINORS’ DATA

In executing its corporate purpose, Khiron collects Sensitive Personal Data and minors’ data. In some cases, this type of Personal Data is processed within the KHIERO Patient Program (or its counterpart in a given jurisdiction) framework, which is a program for permanent patient follow-up during their treatment, which complies with the legal requirements of each jurisdiction. In such context or in any other applicable context according to Khiron’s lines of business, Khiron or third parties authorized thereby undertake to give the Sensitive Personal Data and minors’ data the corresponding processing in accordance with the regulations applicable in the Data Subject’s jurisdiction.

The creation of data bases of Sensitive Personal Data shall have a legitimate justification, a specific purpose, and shall develop Khiron’s activities. To create that type of database, your express consent shall be required. However, you must always bear in mind that you are not obliged to authorize the personal data’s processing, since providing such consent is optional and Khiron ensures respect for the fundamental rights of children and adolescents and cares for and respects their best interests. Khiron shall also validate the minor’s right to be heard when appropriate.

Processing of sensitive Personal Data for historical, statistical, or scientific purposes is permitted. In such cases, Khiron shall delete the Data Subject’s identity.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 9 OF 25
	REVIEW DATE: 24/08/2021		

8. PRIVACY POLICY AMENDMENTS

Khiron reserves the right to amend this Policy. By publishing amendments on our website, you will be deemed to have been notified of changes thereto. Furthermore, any change in the particular privacy conditions of a country shall be published in the section “Special Privacy Provisions by Country”.

9. SPECIAL PRIVACY PROVISIONS BY COUNTRY

To see the Special Privacy Provisions in your country, click here.

- a) Colombia
- b) Peru
- c) Canada
- d) Mexico
- e) EU and UK
- f) Brazil

COLOMBIA


1. Khiron in Colombia

The Data Controllers in Colombia are the following companies, whether referred to individually or jointly: Khiron Colombia S.A.S, Nueva Alternativa de Salud IPS S.A.S and ZERENIA S.A.S., previously known as ILANS S.A.S

2. Contact for Exercising your Rights

To contact Khiron Colombia S.A.S or Nueva Alternativa de Salud IPS S.A.S, as well as to exercise your rights as a Data Subject and file a consultation, claim, request or complaint, a communication must be sent to habeasdata@khiron.ca or in physical to the address Carrera 11 No. 84-09. 3rd Floor, Bogotá, Colombia.

To contact ZERENIA S.A.S. as well as to exercise your rights and file a consultation, claim, request or complaint, a communication must be sent to the habeasdata@clnicazerenia.com.co or in physical to the address Carrera 19ª No. 82-14 Bogotá, Colombia.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 10 OF 25
	REVIEW DATE: 24/08/2021		

3. Applicable Law and Authority

Personal Data Protection Law (Law 1581/2012) and other provisions that amend or supplement it.

The SUPERINTENDENCY OF INDUSTRY AND COMMERCE, through its Delegation for the Protection of Personal Data, acting as national authority for the protection of Personal Data, has the power to receive complaints filed by those whose rights have been violated as a result of noncompliance with the regulations in force regarding Personal Data protection.

4. Personal Data and Personal Information

Personal information, as defined in the Law on Personal Data Protection (Law 1581/2012), means: Any information that is linked or can be associated with one or more determined or determinable natural persons.

PERU

1. Khiron in Peru

The Data Controller in Peru is Khiron Peru S.A.

2. Contact for Exercising your Rights

In order to contact Khiron Peru S.A., as well as to exercise your rights as a Data Subject and file a consultation, claim, request or complaint, a communication must be sent to habeasdata@khiron.ca or in physical to the address Santo Toribio Avenue No. 173, Int. 1635, Urbanización El Rosario - San Isidro, Lima, Peru.


3. Applicable Law and Authority

Personal Data Protection Law (Law 29733) and other provisions that amend or supplement it.

The Ministry of Justice - National Justice Directorate is the national authority for the protection of Personal Data, which will receive claims filed by those whose rights have been violated for noncompliance with the regulations in force regarding Personal Data protection.

4. Personal Data and Personal Information

Warning. The original Controlled document, which this document is based on, is stored in the HSEQ Management System of Khiron Colombia. Any printed version of it is not a Controlled version and as such should be compared with the original document at the time of its use in order to ensure that it has been properly updated.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 11 OF 25
	REVIEW DATE: 24/08/2021		

Personal information, as defined in the Personal Data Protection Law (Law 29733), means: any information about a natural person identifying them or making them identifiable by any means that can reasonably be used.

CANADA

1. Khiron in Canada

The Data Controller in Canada is Khiron Life Sciences Corp., a British Columbia (BC) corporation.

2. Contact for Exercising your Rights

To contact Khiron Life Sciences Corp., as well as to exercise your rights and file a consultation, claim, request or complaint, a communication must be sent to habeasdata@khiron.ca or to ATT: Khiron Privacy Officer c/o Gowling WLG, 100 King Street West, Toronto, Ontario M5X 1G5.

3. Applicable Law and Authority


The *Personal Information Protection and Electronic Documents Act* (PIPEDA) applies to private-sector organizations across Canada that collect, use or disclose personal information in the course of a commercial activity. All businesses that operate in Canada and handle personal information that crosses provincial or national borders are subject to PIPEDA, regardless of the province or territory in which they are based (including provinces with substantially similar legislation).

British Columbia's *Personal Information Protection Act* (PIPA) applies to any private sector organization (such as a business or corporation) that collects, uses, and discloses the personal information of individuals in BC. PIPA also applies to any organization located within BC that collects, uses, or discloses personal information of any individual inside or outside of BC.

4. Personal Data and Personal Information

"personal information" means information about an identifiable individual and includes employee personal information but does not include (a) contact information, or (b) work product information;

"employee personal information" means personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 12 OF 25
	REVIEW DATE: 24/08/2021		


employment relationship between the organization and that individual, but does not include personal information that is not about an individual's employment;

"contact information" means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual;

"work product information" means information prepared or collected by an individual or group of individuals as a part of the individual's or group's responsibilities or activities related to the individual's or group's employment or business but does not include personal information about an individual who did not prepare or collect the personal information.

5. Other

- Consent required: an organization must not collect, use or disclose personal information about an individual unless the individual gives consent to the collection, use or disclosure; PIPA authorizes the collection, use or disclosure without the consent of the individual; or PIPA deems the collection, use or disclosure to be consented to by the individual.
- Implicit consent: an individual is deemed to consent to the collection, use or disclosure of personal information by an organization for a purpose if at the time the consent is deemed to be given, the purpose would be considered to be obvious to a reasonable person, and if the individual voluntarily provides the personal information to the organization for that purpose. An organization may collect, use or disclose personal information about an individual for specified purposes if the organization provides the individual with a notice that it intends to collect, use or disclose the individual's personal information for those purposes, gives the individual an opportunity to decline and the individual does not decline, and the collection, use or disclosure of personal information is reasonable having regard to the sensitivity of the personal information in the circumstances.
- Collection of employee personal information: an organization may collect employee personal information without the consent of the individual. However, an organization may not collect employee personal information without the consent of the individual unless the collection is reasonable for the purposes of establishing, managing, or terminating an employment relationship between the organization and the individual. An organization must notify an individual that it will be collecting employee personal information about the individual and the purposes for the collection before the organization collects the employee personal information without the consent of the individual.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 13 OF 25
	REVIEW DATE: 24/08/2021		

- **Obligation to Notify Individuals of Security Breaches:** an organization shall notify an individual of any breach of security safeguards involving the individual's personal information under the organization's control if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to the individual.

MEXICO

1. Khiron in México.

The Data Controllers in México es Kuida Life Mexico S.A de C.V

2. Contact for Exercising your Rights

To contact Kuida Life Mexico S.A de C.V, as well as to exercise your rights and file a consultation, claim, request or complaint, a communication must be sent to habeasdata@khiron.ca or to Calle Arquímedes 15, Colonia Polanco V Secc, Alcaldía Miguel Hidalgo, C.P. 11560 Ciudad de México, CDMX, México D.F., Estados Unidos Mexicanos.

3. Applicable Law and Authority

Federal Law of Data Protection and other provisions that amend or supplement it. The Federal Institute for Access to Information and Data Protection is the authority in charge of monitoring and verifying compliance with the law. Said institute will attend to claims and procedures for the protection of rights of those affected due to non-compliance with current regulations on the protection of Personal Data.


4. Personal Data

Personal Data, as defined by the Federal Law of Data Protection, refers to any information concerning a person, identified or identifiable. Consent to process your personal data may be tacit or express.

EUROPEAN UNION AND UK

1. Khiron in the European Union and the UK

The Data Controller in Germany is Khiron Europe GmbH, Poststraße 2-4, 60329 Frankfurt am Main.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 14 OF 25
	REVIEW DATE: 24/08/2021		

The Data Controller in Spain is Khiron Life Sciences Spain, S.L., C/Goya 15 Planta Primera, 28001 Madrid, Spain

The Data Controllers in the UK are Khiron Life Sciences UK Limited and Zerenia Clinics Limited, located at C/O Mackrell Turner Garrett Savoy Hill House, Savoy Hill, London, WC2R 0BU and 9a Wilbraham Place, London SW1X 9AE, respectively.

2. Contact for Exercising your Rights

To contact any of the subsidiaries in the European Union and the UK, as well as to exercise your rights and file a consultation, claim, request or complaint, a communication must be sent to "habeasdata@khiron.ca".

3. Applicable Law and Authority


In Germany, the fundamental law guarantees every citizen the right to decide for themselves on the disclosure and use of information about their person. On the one hand, there is the Federal Data Protection Act (BDSG) and on the other hand the General Data Protection Regulation (GDPR), which applies throughout Europe. The regulations serve to protect citizens of the EU and Germany in the processing of personal data and especially against abusive data processing.

The data protection laws aim to protect the privacy of citizens and prevent the misuse of data processing. Therefore, the processing of personal data is prohibited unless there is a legal basis. Such a legal basis may be:

- A given consent to the processing of his or her personal data.
- The processing of personal data serves the purpose of fulfilling the contract or order to take steps at the request to prior entering into a contract.
- The processing is necessary for compliance with a legal obligation.
- The processing is necessary for the purposes of the legitimate interests pursued by Khiron Europe GmbH

4. Personal Data and Personal Information

The General Data Protection Regulation and the Federal Data Protection Act result in a variety of different rights and tools for data subjects' compliance within the EU. These rights provide the basis for informal self-determination and ensure information sharing and transparency about data

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 15 OF 25
	REVIEW DATE: 24/08/2021		

processing. Clear and specific rights of data subjects are therefore one of the foundations of data protection. The following rights can be invoked by the data subject:

- The mentioned right to data portability.
- The data subject's right to access to information.
- The right of correction, technically known as the right to rectification.
- The also mentioned right to be forgotten (erasure).
- The rights in the scope of consent (if that's the legal ground for processing).

Failure to comply with the required rights may result in a fine from the regulatory authorities of up to €10 million, or 2% of the firm's worldwide annual.

5. External Hosting

This website is hosted by an external service provider (host). Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a web site.


The host is used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6 para. 1 lit. b GDPR) and in the interest of secure, fast, and efficient provision of our online services by a professional provider (Art. 6 para. 1 lit. f GDPR).

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

We are using the following host: Microsoft Azure. Toronto, Canada.

6. SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from "http://" to "https://" and also by the appearance of the lock icon in the browser line.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 16 OF 25
	REVIEW DATE: 24/08/2021		

If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

7. Recording of Data on this Website

Cookies


Our websites and pages use what the industry refers to as “cookies.” Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser.

In some cases, it is possible that third-party cookies are stored on your device once you enter our site (third party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g., cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g., the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions (required cookies) or for the provision of certain functions you want to use (functional cookies, e.g., for the shopping cart function) or those that are necessary for the optimization of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6 Sect. 1 lit. f GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of cookies to ensure the technically error free and optimized provision of the operator’s services. If your consent to the storage of the cookies has been requested, the respective cookies are stored exclusively on the basis of the consent obtained (Art. 6 Sect. 1 lit. a GDPR); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 17 OF 25
	REVIEW DATE: 24/08/2021		

the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third-party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

8. Server Log Files

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- The type and version of browser used
- The used operating system
- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address


This data is not merged with other data sources.

This data is recorded on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

9. Contact Form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6 para. 1 lit. b GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 18 OF 25
	REVIEW DATE: 24/08/2021		

addressed to us (Art. 6 Para. 1 lit. f GDPR) or on your agreement (Art. 6 Para. 1 lit. a GDPR) if this has been requested.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g., after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions, in particular retention periods.

10. Request by e-mail, Telephone or Fax

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6 Sect. 1 lit. b GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6 Sect. 1 lit. f GDPR) or on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR) if it has been obtained.


The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request).

Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

11. Registration on this Website

You have the option to register on this website to be able to use additional website functions. We shall use the data you enter only for the purpose of using the respective offer or service you have registered for. The required information we request at the time of registration must be entered in full. Otherwise, we shall reject the registration.

To notify you of any important changes to the scope of our portfolio or in the event of technical modifications, we shall use the e-mail address provided during the registration process.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 19 OF 25
	REVIEW DATE: 24/08/2021		

We shall process the data entered during the registration process on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR).

The data recorded during the registration process shall be stored by us as long as you are registered on this website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

12. Analysis Tools and Advertising

Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilized operating system and the user’s origin. Google may consolidate these data in a profile that is allocated to the respective user or the user’s device.


Google Analytics uses technologies that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g., cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored.

This analysis tool is used on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimize both, the services offered online and the operator’s advertising activities. If a corresponding agreement has been requested (e.g., an agreement to the storage of cookies), the processing takes place exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the agreement can be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://privacy.google.com/businesses/controllerterms/mccs/>.

IP anonymization

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 20 OF 25
	REVIEW DATE: 24/08/2021		

On this website, we have activated the IP anonymization function. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google’s servers in the United States and abbreviated there only in exceptional cases. On behalf of the operator of this website, Google shall use this information to analyze your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google’s possession.

Browser plug-in

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.


For more information about the handling of user data by Google Analytics, please consult Google’s Data Privacy Declaration at:

<https://support.google.com/analytics/answer/6004245?hl=en>.

Demographic parameters provided by Google Analytics

This website uses the “demographic characteristics” function of Google Analytics, to be able to display to the website visitor compatible ads within the Google advertising network. This allows reports to be created that contain information about the age, gender, and interests of the website visitors. The sources of this information are interest-related advertising by Google as well as visitor data obtained from third-party providers. This data cannot be allocated to a specific individual. You have the option to deactivate this function at any time by making pertinent settings changes for advertising in your Google account or you can generally prohibit the recording of your data by Google Analytics as explained in section “Objection to the recording of data”.

Archiving period

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 21 OF 25
	REVIEW DATE: 24/08/2021		

Data on the user or incident level stored by Google linked to cookies, user IDs or advertising IDs (e.g., DoubleClick cookies, Android advertising ID) will be anonymized or deleted after 14 month. For details, please click the following link:

<https://support.google.com/analytics/answer/7667196?hl=en>

13. Newsletter


Newsletter Data

If you would like to subscribe to the newsletter offered on this website, we will need from you an e-mail address as well as information that allow us to verify that you are the owner of the e-mail address provided, and consent to the receipt of the newsletter. No further data shall be collected or shall be collected only on a voluntary basis. We shall use such data only for the sending of the requested information and shall not share such data with any third parties.

The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke the consent you have given to the archiving of data, the e-mail address and the use of this information for the sending of the newsletter at any time, for instance by clicking on the “Unsubscribe” link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter or after the purpose has ceased to apply. We reserve the right to delete or block e-mail addresses from our newsletter distribution list at our own discretion within the scope of our legitimate interest in accordance with Art. 6(1)(f) GDPR.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR). The storage in the blacklist is indefinite. You may object to the storage if your interests outweigh our legitimate interest.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 22 OF 25
	REVIEW DATE: 24/08/2021		

14. Verification procedures for Physicians and Pharmacists

As a physician or pharmacist, you have the possibility to register in a closed area of our website and use additional functions there. To activate this area, you must first verify your status as a doctor or pharmacist through the DocCheck provider (www.doccheck.com). We do not have access to the personal data processed within the scope of this verification. Personal data will only be processed by us when you register on our website as a physician or pharmacist after successful verification to use additional functions on the site. We use the data entered for this purpose only for the use of the protected area for which you have registered. The mandatory data requested during registration must be provided in full. Otherwise, we will refuse the registration. In case of important changes, e.g. in the scope of the offer or technically necessary changes, we will use the e-mail address provided during registration to inform you in this way.

15. Tools

Google Web Fonts (local embedding)

This website uses so-called Web Fonts provided by Google to ensure the uniform use of fonts on this site. These Google fonts are locally installed so that a connection to Google's servers will not be established in conjunction with this application.

For more information on Google Web Fonts, please follow this link:


<https://developers.google.com/fonts/faq> and consult Google's Data Privacy Declaration under:

<https://policies.google.com/privacy?hl=en>.

Font Awesome (local embedding)

This website uses Font Awesome to ensure the uniform use of fonts on this site. Font Awesome is locally installed so that a connection to Fonticons, Inc.'s servers will not be established in conjunction with this application.

For more information on Font Awesome, please and consult the Data Privacy Declaration for Font Awesome under: <https://fontawesome.com/privacy>.

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 23 OF 25
	REVIEW DATE: 24/08/2021		

16. Social Media

Linkedin

We have a profile on LinkedIn. The provider of this platform is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn is certified under the EU-US Privacy Shield.

We would like to point out that the headquarters of the company is in the USA and that the USA is not a safe third country the purpose of EU data protection law. US companies are obliged to surrender personal data to security authorities without you as the data subject being able to take legal action against this. It cannot therefore be ruled out that US authorities (e.g. secret services) may process, evaluate and permanently store your data on US servers for monitoring purposes. We have no influence on these processing activities.

We use LinkedIn for recruiting, marketing and optimization purposes, in particular to analyze the use of our website and to continuously improve individual functions and offers as well as the user experience. Through the statistical evaluation of user behaviour, we can improve our site and make it more interesting for you as a user.


Data processing during interactions on our LinkedIn profile

We would like to point out that you use this LinkedIn site and its functions at your own risk. This applies in particular to the use of the interactive functions (e.g. commenting, sharing, rating).

Each time you visit our LinkedIn site, they collect your IP address and other information that is stored on your PC in the form of cookies. This information is used to provide us, as the operator of the LinkedIn pages, with statistical information about the use of the LinkedIn page. LinkedIn provides more information about this at the following link:

<https://privacy.linkedin.com/de-de>

The data collected about you in this context will be processed by LinkedIn Ireland Unlimited Company and may be transferred to countries outside the European Union. LinkedIn's privacy policy describes in general terms what information LinkedIn receives and how it is used. You will also find information on how to contact LinkedIn. The data use policy is available at the following link:

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 24 OF 25
	REVIEW DATE: 24/08/2021		

https://www.linkedin.com/legal/privacy-policy? l=de_DE.

BRAZIL

1. Khiron in Brazil

The Data Controller in Brazil is Zerenia Clinic Servicos Medicos Ltda.

2. Contact for Exercising your Rights

To contact Zerenia Clinic Servicos Medicos Ltda., as well as to exercise your rights and file a consultation, claim, request or complaint, a communication must be sent to habeasdata@clinicazerenia.com.br to Rua Vinicius De Moraes Nº201- Ipanema- Rio De Janeiro -Rj- Cep: 22411-010.

3. Applicable Law and Authority

This privacy policy will be governed, interpreted, and executed in accordance with the laws of the Federative Republic of Brazil, in particular by Law No. 3.709/2018, unless otherwise provided by law.


4. Personal Data and Data Subject Rights

Personal Data that is no longer useful may be eliminated, or even eliminated by request of the Data Subject or transferred to a third party also by request of the Data Subject, unless its maintenance is necessary for Khiron and its storage is authorized by applicable law or regulation. Health Personal Data, especially those contained in the patient's medical record, will be stored for as long as necessary to comply with the legal or regulatory obligation currently in force in Brazil.

The information may be kept for as long as necessary for the fulfillment of a legal or regulatory obligation, and for the exercise of your rights in judicial, administrative or arbitration proceedings.

Zerenia Clinic Servicos Medicos Ltda. is also committed to guaranteeing the following other rights of the Data Subject:

1. Confirmation of the Processing;
2. Access to Personal Data;
3. Correction or updating of Personal Data;
4. Anonymization, blocking or deletion of unnecessary Personal Data;

	GLOBAL INFORMATION PRIVACY POLICY		CODE: 09-01-903
	ISSUANCE DATE: 24/08/2021	VERSION: 02	PAGE 25 OF 25
	REVIEW DATE: 24/08/2021		

5. Obtaining information about the public or private entities with which Zerenia Clinic Servicios Medicos Ltda. shared the Personal Data;
6. Revocation of consent in the case of Personal Data is collected automatically and/or used only for advertising purposes;

These rights may be exercised by sending a request to the Data Protection Officer via the email address to habeasdata@clinicazerenia.com.br. Zerenia Clinic Servicios Medicos Ltda. Will make every effort to fulfill the requests in the shortest possible time. However, justifiable factors, such as the complexity of the request, may delay or prevent its rapid response.

Finally, the Data Subject must be aware that his request may be rejected by Zerenia Clinic Servicios Medicos Ltda. for formal reasons (such as the inability to prove his identity) or legal reasons (such as a request to delete Personal Data to comply with legal or regulatory obligations)

FORMATS AND REGISTRATION

NAME	ARCHIVE					DISPOSAL
	?WHO?	?HOW?	?WHERE?	TIME	USER	

CONTROL OF CHANGE

SUMMARY OF THE MODIFICATIONS	
Drafted document	Version 00 18/02/2018 8
Review & approval by board of directors	Version 01 22/02/2021 1
Add Germany	Version 02 24/08/2021 1
DETAIL OF ELIMINATIONS	
N/A.	

Warning. The original Controlled document, which this document is based on, is stored in the HSEQ Management System of Khiron Colombia. Any printed version of it is not a Controlled version and as such should be compared with the original document at the time of its use in order to ensure that it has been properly updated.