

Conflict of Interest Privacy Notice (part of the Privacy Notice to Candidates)

(hereinafter referred to as the “Notice”)

This Conflict of Interest (“CoI”) Privacy Notice (“Notice”) applies to all individuals applying to any position who reached a final round of application process (“Candidate”) at any legal entity of Arcera in line with our Conflict of Interest Policy.

A CoI is a situation in which you may have two conflicting interests that you cannot adequately fulfil at the same time, or it may seem so.

- Actual Conflict of Interest: A situation where a conflict currently exists.
- Perceived Conflict of Interest: A situation that could reasonably be perceived as a Conflict of Interest, even if no actual conflict exists.
- Potential Conflict of Interest: A situation where a Conflict of Interest could reasonably be expected to arise in the future.

The CoI policy requires you to report actual, perceived or potential CoIs in a declaration form in the conditions set forth in the Arcera Conflict of Interest Policy. Such declarations include personal data, and this Notice provides you with information on how we handle the data included in the declaration form.

The CoI policy requires Candidates to report actual, perceived or potential CoIs in a declaration form in the conditions set forth in the Arcera Conflict of Interest Policy. Such declarations include personal data and this Notice provides Candidate with information on how such data will be processed.

1. Who is responsible for your personal data

Arcera Life Sciences LLC OPC, and the respective regional group company (“Arcera”, “we”, “us”, “our”) will as joint data controllers operate the CoI process for Arcera Group.

Arcera and its regional entities (i.e., the legal entity to which the Candidate applies and (if different) the Arcera entity affected by the CoI), are jointly responsible for the collection and use of personal data when the declaration is managed centrally by the Global Compliance or Global People & Culture teams.

2. Personal data we process

Below you will find a description of the personal data we will collect and process about you as well as the purpose on which basis we are processing the personal data when you are declaring a CoI.

The data we process for the purposes of CoI:

- Your name,
- Your email address,
- Country,
- Name, job title, function, relationship and related Arcera entity if your family member is working for Arcera, a business partner of Arcera, or a government entity of relevance to Arcera,
- Any other personal information you may have disclosed in the declaration form.

In principle, we do not request or process any special categories of personal data (also known as sensitive personal data), e.g., information on racial and/or ethnic origin, religious and/or ideological beliefs, trade union membership or sexual orientation. Please refrain from disclosing such information in any free text fields in the CoI declaration form. If you believe that such data is relevant to declare your CoI, please contact your contact person in our People & Culture department before submitting such information.

In general, the personal data processed in context of CoI procedure will be limited to those:

- mentioned in the declarations and,
- resulting from monitoring the transactions with Related Parties.

In any case, only personal data strictly necessary to understand, verify, clarify, and resolve a CoI will be processed.

3. Purpose of the processing and the legal grounds

Arcera processes personal data to ensure that Candidates are meeting the duty of care they could owe to Arcera and to prevent transactions which may conflict with the interests of Arcera. The legal ground for such processing is Arcera's legitimate interest by default. By exception, in jurisdictions where legitimate interest is not an appropriate legal basis for this personal data processing, your personal data will be processed on the legal basis of the execution of the contract.

4. How we process personal data

Arcera uses Microsoft Forms for collecting data on actual and potential CoIs. The completed forms are stored in a SharePoint folder with access limited to the respective representatives of P&C.

The names of related parties are also shared with the departments of relevance; however, Candidate's name will be redacted so that only the functions responsible for overall management of the CoIs (namely, P&C and Integrity & Compliance) can make the association between Candidate and related party.

5. Security, disclosure of personal data and international transfer of personal data

Arcera operates internationally and has locations in various countries across the world.

The stored data may only be processed by specially authorized persons representing People & Culture and Compliance within Arcera.

In general, personal data is processed in the region where you are located; provided, however, that data submitted for senior position in global roles and executive position will be processed by Global People & Culture and/or Global Integrity & Compliance in Switzerland or UAE. Insofar as this is necessary to fulfil the purpose of personal data processing, specially authorized persons of Arcera companies located outside your region may also be entitled to inspect the documents. This is particularly the case when a CoI is escalated to Global HR and/or Global Integrity & Compliance for assistance in its resolution.

For certain executive positions, the data may also be shared with our shareholder ADQ.

Within the Arcera group, we have an Intra Group Data Transfer Agreement that protects personal data transferred internationally within the group and is based on the Standard Contractual Clauses of the European Commission.

6. Duration of storage

People & Culture shall maintain a CoI Register setting forth the name of each Candidate who discloses a CoI and the date of declaration (date of submission of the CoI Form).

The function (Regional or Global P&C/Compliance) tasked with resolving the disclosed CoI shall retain all documents and information related thereto (including the completed CoI Form) until a) the expiration of three (3) years from such time as the CoI was last disclosed if the candidate is hired (Candidates could be asked to “re-disclose” a CoI if they are hired and the reported CoI continues to exist), or b) the Candidate has never been or is no longer employed by/affiliated with Arcera upon which the declaration will be immediately deleted

7. Which rights you have regarding your personal data

You, as a personal data subject, have the following rights:

- The right to information and access – to know which personal data Arcera holds about you, obtain detailed information about how your data is used and who has access to it, you can obtain a copy of all your personal data, obtain its correction or rectification if incorrect or incomplete.
- The right to object - you have the right to object to Arcera processing (using) your personal data. This effectively means that you can stop or prevent us from using your personal data. However, it only applies in certain circumstances, and we may not need to stop the processing of your personal data if we (i) have compelling legitimate grounds to process it that override your rights and freedoms, (ii) needs it to establish, protect or defend our rights or (iii) comply with applicable law.
- The right to erasure - you have the right to ask us to erase your personal data in certain circumstances provided that Arcera does not have to keep it for legal reasons.

- The right to rectification - you can also request Arcera to stop using your personal data until clarification (but not delete it), if you consider that your personal data has been used in violation of applicable data protection law. If you want to obtain any rectification, you can contact the respective members of the Compliance team via the Speak-Up platform. You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.
- The right to restriction of processing - you have the right to ask us to restrict the processing of your personal data in certain circumstances.
- The right to complain – anyone whose personal data is processed has the right to complain. If you have any complaints about Arcera’s processing of your personal data, please contact our Group Data Protection officer at privacy@arceralifesciences.com.

If you are not happy with the way we handle your complaint, you may contact the respective Data Protection Authority.

7. Contact information

If you have any questions or concerns about how we process your personal data, please contact us by email: privacy@arceralifesciences.com regarding your personal data.

8. Changes to the Privacy Notice

We may need to change this Privacy Notice from time to time to ensure it meets the possible changes in the process or the updated laws. Any change to the CoI Privacy Notice will be duly communicated on our intranet and attached to the latest CoI Form (usually via link).