

## DATA PRIVACY NOTICE (MPSG)

This Notice describes the practices of Marubeni Pharmaceuticals Asia Pacific Pte. Ltd. ("MPSG", "we" or "us") with respect to the collection, use, storage, handling, management, retention, destruction and disclosure ("processing") of Personal Data for the purpose(s) outlined below. All individuals who wish to submit Personal Data to us (referred to below as "you" or "your") should carefully read the provisions of this Privacy Notice. By providing Personal Data to us, you acknowledge that you have read and understand this Privacy Notice.

"Personal Data," as used in this Notice, refers to any information, whether true or not, relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, whether directly or indirectly, including by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### The Information We Process About You

We process the information we collect from you directly, such as during our communications with you about MPSG, through your engagement with MPSG's online platforms, or in the course of any services you provide to MPSG. The Personal Data we may collect from you directly includes, for example:

- Your name and contact information
- Your health information
- Your demographic data
- Your online identifiers
- Your IP Address
- 3rd party cookies
- Your geo-location data, as may be transmitted to us by your smart phone or other location - aware devices
- Where applicable, your identification number
- Your contact and communication preferences
- Your training and qualifications

- Your professional interests (such as health care topics in which you have expressed an interest)
- Your interest in our products and services
- If you provide us with consulting or other services, bank account number, tax identification number(s), and other information necessary to make payments

In some cases, we will require that you provide certain information in order for MPSG to provide you with a service or take an action that you request. We will indicate when such information is required. Failure to provide required or mandatory information may result in termination of our relationship or our inability to take an action you request.

In addition, we may collect the following kinds of information about health care professionals from third parties:

- Additional information about your training and qualifications, such as your organizational or institutional affiliations, place of employment, educational history, publications, professional identification number, and professional experience;
- Information about debarment and any professional discipline measures from government sources or professional organizations.
- Information about prescriptions written, medical claims filed, and/or diagnostic tests ordered ("Prescribing Behavior").

## Purposes and Legal Basis for Processing Your Data

We process your Personal Data:

- To communicate product safety information to you.
- To respond to your requests for information about our products and services.
- Communicate other information that we think may be of interest to you through our web sites, via e-mail, call centers, postal mail and other channels, including promotional communications about our products and services.
- To keep track of our interactions with you, both online and offline.
- To conduct business and marketing research.

- To process and report adverse event information, drug safety issues and product complaints.
- To identify and engage scientific experts.
- To identify and invite speakers and invitees to conferences and other scientific and educational programs we host or sponsor.
- To plan and implement marketing, sales and other activities, which include without limitation, sponsorships and product presentations.
- To plan and make travel arrangements for you due to your participation in events that we host or sponsor.
- To track and report payments and other transfers of value in accordance with financial disclosure transparency requirements.
- To audit our programs and services for compliance purposes.
- To meet our facility and network security, compliance and legal obligations.
- For internal investigations of possible misconduct or failure to comply with our policies and procedures.
- Manage data subject requests.
- For legal proceedings and government investigations (such as pursuant to warrants, subpoenas, and court legal orders).
- Where we have legal obligations to process the Personal Data.
- For statistical analytics, including Google Analytics.
- Meet our contractual obligations to you, if you provide us with services.
- For website administration.

We may process your Prescribing Behavior to enable us to:

- tailor our messaging and communications to you, including messaging and communications for promotional purposes, based upon your Prescribing Behavior; and
- better understand the market for our existing products and services, and potential new products and services, and to adjust our research, development, and marketing strategies accordingly.

We may also use your Personal Data to determine your potential involvement in future activities with MPSG and to contact you in relation to these activities.

We may combine the data that we collect in order to provide these functions.

We have the following legal bases for processing the information that you provide to us, that

we collect in the course of interactions with you, or that we collect from third parties about you:

- Based on your consent: In some cases, at the point at which you provide Personal Data, we may ask you for your clear and express consent to collect, use and/or process your Personal Data before or at the time of receiving, collecting, using and/or processing them. If you choose to provide us with your consent, you may later withdraw your consent (or opt-out) by contacting us as described in the "how do you contact us" section below. Please note that if you withdraw your consent, it will not affect any processing of your Personal Data that has already occurred. Where we process your Personal Data based on consent, we will provide more detailed information to you at the time when we obtain your consent.

- Our legitimate interest: We have a legitimate interest in communicating with you about our products and services; in communicating with you about scientific research opportunities; in analyzing the market for our products and services; and in meeting our security, legal and compliance obligations. We process all the information we collect from or about you to meet these purposes.

- Compliance with applicable laws or performance of a contract: In specific circumstances, we may need to process your Personal Data to comply with a relevant law/regulation or to fulfill our obligations under a contract to which you are subject. Where we process your Personal Data to meet our legal obligations, you will likely not be permitted to object to this processing activity, but you will usually have the right to access or review this information unless it would impede our legal obligations and cause damage to the right and freedom of any other person. Where we are processing your Personal Data to fulfill our obligations under a contract to which you are a party, you might not be able to object to this processing, or if you do choose to opt-out or object to our processing, it may impact our ability to perform a contractual obligation that you are owed.

In the case of Sensitive Personal Data (which includes (i) information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; (ii) genetic and biometric data, and (iii) data concerning health, sex life, or sexual orientation), (iv) criminal records and (v) other information which has the same influence over the data subject as the other information mentioned above, we process such information either (i)

because we have your consent to do so or (ii) because we are required to process the information to comply with applicable laws. When we process your Sensitive Personal Data on the basis of your consent, you may withdraw that consent at any time by contacting us. If you withdraw your consent, we may still be required to process your Sensitive Personal Data to comply with applicable law, but we will explain to you at the time your consent is withdrawn what processing activities will continue for legal compliance purposes.

We will record the use and disclosure of your Sensitive Personal Data in writing or by an electronic means as required by law.

#### Recipients of Your Personal Data

Your Personal Data will be received and processed by our employees and personnel (including those employees and personnel of our affiliates), including third parties who provide services to us in connection with the purposes of processing described above. These third parties may include, for example, our website providers, vendors that assist us in communicating with you, database providers, survey and marketing research organizations, and event organizers ("Personal Data Processors"). We share your Personal Data with our service providers only when they have agreed to process your Personal Data only to provide services to us and have agreed to protect your Personal Data from unauthorized use, access, or disclosure.

We may disclose your Personal Data, including your financial relationship with us and any amounts you have been paid by us, to government authorities and the public in response to authorized information requests, or as otherwise required by laws, regulations, regulatory guidance or standards, judicial or administrative proceedings, or industry codes.

We may disclose your Personal Data where necessary to protect our rights and safety or the rights and safety of one or more third parties.

MPSG is a subsidiary of Marubeni Pharmaceuticals Corporation., Ltd., and we may disclose your Personal Data for the purposes described above to our Marubeni Pharmaceuticals affiliates. We may also disclose your Personal Data for the purposes described above to our development and business partners. Finally, in the event of any reorganization or divestment of our business through sale, merger, or acquisition, we may share Personal data about you

with actual or prospective purchasers.

In case it is required by law for us to obtain your consent before or when we disclose your Personal Data to a third party, we will obtain your consent as required by law.

#### Transfers to Third Countries

Your Personal Data may be processed in any country where we have facilities or service providers, and by using our service(s) or by providing consent to us (where required by law), your information may be transferred to locations outside of your country of residence, which may provide for different data protection rules than in your location.

In the absence of an adequacy decision and/or appropriate safeguards, Personal Data will be transferred on one of the following conditions:

- the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards;
- the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for the establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the transfer is in compliance with the personal data policy of MPSG or the Personal Data Processors in your country for transferring the Personal Data to data controllers or data processors abroad under our policy as verified and certified by the personal data protection authority of your country.

## Personal Data of Children And Legally Incapacitated Persons

We do not knowingly solicit, collect or maintain Personal Data from individuals under the age of majority or legally incapacitated persons without parental or legal guardian consent. If you become aware that an individual under the age of majority or a legally incapacitated person has provided us with Personal Data without parental consent or legal guardian consent, please contact us, we will take steps to remove the data as permitted by law.

## Data Retention

We keep data for (i) as long as we have an ongoing relationship with you; (ii) as required by a contractual or legal obligation to which we are subject; and (iii) as otherwise necessary for contractual or legal purposes (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

## Your Rights

You may have the right to the following information regarding our processing of your Personal Data:

- the purposes of the processing,
- the categories of Personal Data concerned,
- the recipients or categories of recipients to whom the Personal Data have been or will be disclosed,
- where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period.

You may also have the following additional rights with respect to your Personal Data:

- The right to request access to the Personal Data that we have about you, as well as the right to request rectification of any data that is inaccurate or incomplete.
- The right to request a copy of your Personal Data in electronic format so that you can

transmit the data to third parties, or to request that we directly transfer your Personal Data to one or more third parties.

- The right to object to the processing of your Personal Data for marketing and other purposes.
- The right to erasure of your Personal Data when it is no longer needed for the purposes for which you provided it, as well as the right to restriction of processing of your Personal Data to certain limited purposes where erasure is not possible.
- The right to lodge a complaint with the supervisory authority in the country where you live or work or where you believe that your rights have been violated.
- The right to request us to cease using your Personal Data (1) during the period of time when you asked us to update or rectify your Personal Data, (2) that must be deleted or destroyed because it was collected, used or processed illegally, (3) that is no longer required to be collected but you request us to keep them for legal purposes or (4) during the examination period after you exercised your right to object the collection, usage or disclosure of your Personal Data.
- The right to request us to record our rejection to update or rectify your Personal Data and the reasons for it in the list of information accessible to you and the personal data protection authority as required by law.

Questions?

You can contact us with any questions about this notice, our data collection practices, or to exercise your rights by using our privacy request system at: [compliance@marubeni-pharma.com](mailto:compliance@marubeni-pharma.com)

Please note that from time to time we may make changes to this Privacy Notice to reflect changes in our legal obligations or the ways in which we process Personal Data. We will communicate to you any material changes to this Privacy Notice and such changes will become effective when they are communicated. In addition, this general notice may be supplemented by additional notices at the point of any data collection. If you have specific questions about any of the data processing activities described in this or any other notice, please contact us at:

MPSG Compliance Team

Email: [compliance@marubeni-pharma.com](mailto:compliance@marubeni-pharma.com)