

UCB Funding Management Portal (eRequest)

Privacy Policy

1. WHO WE ARE AND HOW YOU CAN CONTACT US

UCB or **we** means UCB BioPharma SRL, a company incorporated under the laws of Belgium with registered office at Allée de la Recherche 60, 1070 Brussels, Belgium.

As the **controller**, i.e. the legal entity that decides why and how information relating to you (**personal data**) is collected and processed in the context of this eRequest website (the **Website**), we respect your right to privacy.

We will only process your personal data as described in this UCB eRequest Funding Management and Collaborations Privacy Policy (the **Policy**) and in accordance with the relevant data protection legislation, including *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC* (the General Data Protection Regulation or **GDPR**).

We have both global and local Data Protection Officer (DPO), who can be contacted by any of the following means for any privacy-related questions, including regarding how we collect, store and use your personal data:

- E-mail: dataprivacy@ucb.com ; or
- Regular mail: to the attention of the global Data Protection Officer, Allée de la recherche 60, 1070 Anderlecht, Belgium or to the attention of the local UCB Data Protection Officer at the postal address of the UCB affiliate in your jurisdiction. For more information, please visit <https://www.ucb.com/worldwide> and select your country.

2. THE REASON BEHIND THIS PRIVACY POLICY

The Policy governs the collection, use and retention by UCB of personal data relating to your use of the Website. This Policy applies to all Website users.

The Policy consists of five main components and informs you about:

1. Who we are and how you can contact us;
2. The reason behind this Policy;
3. The purposes for which we process your personal data, the related legal basis under the GDPR and applicable retention periods;
4. What your rights are in relation to the personal data we hold about you and how you can exercise them; and
5. Further details on how we process (including transfer) your personal data.

This Policy may be updated periodically to reflect changes in our personal data processing activities. In that case, we will inform you of any significant changes via an appropriate channel, in the same manner as we have informed you before, e.g. by posting a prominent notice on the Website.

3. THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA AND APPLICABLE LEGAL BASIS

The table below indicates per purpose (i) the categories of personal data we collect and process concerning you, (ii) the source, (iii) how long we retain your personal data, (iv) who we share it with, and (v) the relevant legal basis.

1. <u>In order to manage your login account (incl. account registration), UCB:</u>	
Collects the following personal data about you:	Your Contact information and professional details: including name of institution/employer, prefix, first name, last name, email, job title, department or chapter, country, state/province, phone number
Obtains this personal data from:	Directly from you
Retains (**) your personal data for:	Your personal information will be retained for no longer than is necessary for the purposes stated in this policy, unless otherwise extending the retention period is required or permitted by law. In general, your personal data will be kept for 6 years after the closure of all requests related to you. For certain scenarios, the retention period can be extended up to 10 years.
Shares your personal data with:	Third party processors (as detailed in section 5.A.)
Relies on the following GDPR legal basis:	Processing necessary for the purpose of the legitimate interests pursued by UCB in relation to administrative and operational management
2. <u>In order to submit, review and approve funding requests (Grants, Donations and Sponsorships), as well as to submit, review, approve and track Investigator Initiated Studies (IIS), UCB:</u>	
Collects the following personal data about you:	<ul style="list-style-type: none"> - Your Contact information and professional details: including name of institution/employer, prefix, first name, last name, email, job title, department or chapter, country, state/province, phone number, the NPI number when necessary; - ID assigned by governmental bodies or UCB; - Curriculum Vitae
Obtains this personal data from:	<ul style="list-style-type: none"> - Directly from you for your contact information and professional details, as well as curriculum vitae; - Possibly through Valenz Health when background check is mandatory or based on your consent.
Retains (**) your personal data for:	Your personal information will be retained for no longer than is necessary for the purposes stated in this policy, unless otherwise

	extending the retention period is required or permitted by law. In general, your personal data will be kept for 6 years after the closure of all requests related to you. For certain scenarios, the retention period can be extended up to 10 years.
Shares your personal data with:	Third party processors (as detailed in section 5.A.)
Relies on the following GDPR legal basis:	Processing necessary for the purpose of the legitimate interests pursued by UCB in relation to funding management and the approval procedure, or based on data subjects' consent regarding background check
3. <u>In order to set up and execute a contract, UCB:</u>	
Collects the following personal data about you:	<ul style="list-style-type: none"> - Your Contact information and professional details: including name of institution/employer, prefix, first name, last name, email, job title, department or chapter, country, state/province, phone number; - ID assigned by governmental bodies or UCB; - Curriculum Vitae
Obtains this personal data from:	Directly from you
Retains (**) your personal data for:	Your personal information will be retained for no longer than is necessary for the purposes stated in this policy, unless otherwise extending the retention period is required or permitted by law. In general, your personal data will be kept for 6 years after the closure of all requests related to you. For certain scenarios, the retention period can be extended up to 10 years.
Shares your personal data with:	Third party processors (as detailed in section 5.A.)
Relies on the following GDPR legal basis:	Processing necessary for the performance of a contract with you
4. <u>In order to ensure the site functionality and to improve user experience, UCB:</u>	
Collects the following personal data about you:	User and session identifiers
Obtains this personal data from:	Through cookies
Retains (**) your personal data for:	See Cookie Policy for more information

Shares your personal data with:	Third party processors (as detailed in section 5.A.)
Relies on the following GDPR legal basis:	Processing based on your consent except for strictly necessary cookies

(**) We will retain your personal data in accordance with the retention periods set out in the table above. These retention periods, included in our data retention policy, are dictated by:

- applicable statutory/legal requirements;
- industry guidelines; and
- for those data categories for which no express statutory or legal requirements apply, certain other determining factors such as the need to prove or enforce a transaction or contract, enforce our policies, etc.

We will delete your personal data once the abovementioned retention periods will have expired or if you object to or if you withdraw your consent in relation to our processing of your personal data (to the extent such processing is based on your consent), except where we need to hold on to such data for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, for compliance with a European Union or European Union Member State legal obligation which requires such further processing or where we need to prove or enforce a transaction or contract or enforce our policies.

4. YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM

4.A. Your rights

Right to access

You have the right to obtain confirmation from us as to whether or not we process personal data concerning you, and if so, the right (as far as this does not adversely affect the rights and freedoms of others) to obtain a copy of your personal data from us.

For more information, please check Section 4.B “How to exercise your rights”.

Right to rectification

You have the right to ask us to rectify without undue delay any inaccurate personal data concerning you. You can also ask us to complete incomplete personal data regarding you by providing us with a supplementary statement containing such additional information.

For more information, please check Section 4.B “How to exercise your rights”.

Right to erasure

You have the right to ask us to erase without undue delay personal data concerning you, where one of the following grounds applies:

- your personal data are no longer necessary in relation to the purposes for which they were processed;
- you have withdrawn your consent - for those processing activities based on your consent – and we have no other legal ground for such processing;
- you object to the processing of your personal data (*for more information on the right to object, see further below*) and there are no overriding legitimate grounds for such processing;
- your personal data have been unlawfully processed;
- your personal data must be erased for compliance with a European Union or European Union Member State legal obligation to which UCB is subject.

Please note that your right to erasure will not apply to the extent that processing is necessary for:

- exercising the right of freedom of expression and information;
- compliance with a European Union or European Union Member State Law to which UCB is subject;
- reasons of public interest in the area of public health in accordance with article 9(2)(h) and (i) GDPR as well as article 9(3) GDPR;
- archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the relevant provisions of the GDPR;
- the establishment, exercise or defense of legal claims.

For more information, please check Section 4.B “How to exercise your rights”.

Right to restriction of processing

You have the right to obtain from UCB restriction of processing by UCB of your personal data where one of the following applies:

- you contest - in good faith - the accuracy of personal data regarding you and held by us, in that case the restriction of processing will apply for a period enabling us to verify the accuracy of your personal data;
- the processing is unlawful and you oppose the erasure of your personal data and request restriction of their use instead;
- we no longer need your personal data, but you require them for the establishment, exercise or defense of legal claims;
- you have objected to the processing of your personal data by UCB in accordance with the relevant GDPR provision, in that case the restriction of processing will apply for a period enabling us to verify if our legitimate grounds override yours.

Please note that notwithstanding the above, we are still allowed to continue storing your personal data (throughout the period of restriction) or to process your personal data for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person. If you have requested restriction of processing, we will inform you before the restriction of processing is lifted.

For more information, please check Section 4.B “How to exercise your rights”.

Right to data portability

You have the right (insofar this does not adversely affect the rights and freedoms of others) to receive the personal data concerning you, that you have provided to UCB, in a structured, commonly used and machine-readable format and to transmit those data to another controller, without hindrance from UCB, where the processing is:

- based on your consent or on a contract; and
- carried out by automated means.

For more information, please check Section 4.B “How to exercise your rights”.

Right to objection to processing

You have the right to object at any time, on grounds relating to your specific situation, to the processing of your personal data by UCB which is based on UCB’s pursuit of its legitimate interests as a controller. In that case UCB will no longer process your personal data, unless:

- UCB demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms; or
- for the establishment, exercise or defense of legal claims.

You have the right to object at any time to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

For more information, please check Section 4.B “How to exercise your rights”.

Right to withdraw consent

Where the processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

For more information, please check Section 4.B “How to exercise your rights”.

4.B. How to exercise your rights

If you wish to exercise any of the rights mentioned above, you can always contact the local UCB Data Protection Officer by e-mail at dataprivacy@ucb.com or otherwise reach out to us by postal mail at UCB Biopharma SPRL, to the attention of the global Data Protection Officer, Allée de la recherche 60, 1070 Anderlecht, Belgium or to the attention of the local UCB Data Protection Officer at the postal address of the UCB affiliate in your jurisdiction. For more information, please visit <https://www.ucb.com/worldwide> and select your country.

Please clearly identify the right(s) you wish to exercise and include your contact details (including a valid e-mail or postal address) so that we can respond to your request. Please note that you may be asked to provide proof of your identity.

When you contact us to exercise any of the rights mentioned above, we will respond to your request within one month following receipt of the request. This period may be extended by two additional months where necessary, but in that case we will inform you of any such extension within one month of receipt of your initial request together with the reasons for the delay.

Right to lodge a complaint with supervisory authority

In accordance with article 77 GDPR you have the right to lodge a complaint with a supervisory authority, in particular in the European Union Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that UCB's processing of your personal data infringes the GDPR. Please visit the website of the relevant national supervisory authority for more information on how to submit such a complaint.

5. MORE DETAILS ON HOW WE PROCESS YOUR PERSONAL DATA

5.A. Who we share your personal data with.

Principle

We will disclose your personal data only as described in this Policy, as may be updated from time-to-time.

Affiliates and third party processors

UCB transfers or discloses your personal data to its personnel, affiliates and to third party service providers processing personal data on UCB's behalf for the purposes set out above and our partners (including e.g. other pharmaceutical companies) with whom we have a collaboration agreement and who have a need to know this information.

Third party service providers include IT services and website hosting companies, (internet) connectivity providers, providers of data analytics (including Google) and tracking services, providers of press release and newsletter distribution networks (including The Rocket Science Group LLC d/b/a MailChimp), as well as service providers that provide technical and administrative support for the Website and underlying IT systems as well as providers that assist us with adverse event reporting.

The UCB eRequest Funding Management and Cooperations Portal transfers your personal data specifically to:

- SmartSimple Software Inc., a company based in Canada, is providing us with hosted software solutions for eRequest.
- Kinapse, a Syneos Health Company, with offices in Romania, is providing us with operational support of your requests.
- Valenz Health, a company based in United States, is providing us with background check services.

Other third parties include regulatory and government agencies (see further below in this Policy), our advisors and external legal counsel, our auditors, and potentially, third parties with whom UCB may merge or which may be acquired by UCB (see further below in this Policy).

Compliance with laws and legal proceedings

UCB will disclose your personal data where:

- UCB is required to do so by applicable law, by a governmental body or by a law enforcement agency;
- to establish or exercise our legal rights or defend against legal claims;

- to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies or as otherwise required by law.

Other

If a third party acquires all (or substantially all) of our business and/or assets, we will disclose your personal data to that third party in connection with the acquisition. However, such disclosure will occur subject to and in accordance with applicable data protection laws, including the GDPR.

5.B. International transfers

In case of transferring your personal data to its affiliates, including our affiliates outside of the EEA, UCB relies on UCB's Binding Corporate Rules, which can be accessed through the following link: https://www.ucb.com/UCB_BCRs.pdf.

As indicated above, your personal data may have to be transferred to certain third party service providers both within the EEA and outside the EEA, including for processing, storage, back-up, and to guarantee a continued service in case of major IT issues and outside of the EEA. Such non-EU countries may not offer the same level of personal data protection as the EEA countries. We will therefore put in place suitable safeguards to ensure such transfer is carried out in compliance with the applicable data protection rules.

The transfer of your personal data to (other) third party service providers outside of the EU (as set out above under Section 5.B) occurs on the basis of Standard Contractual Clauses that have been executed between UCB and the relevant third party service provider. For more information on these Standard Contractual Clauses, please reach out to us as set out above under Section 4.B ("How to exercise your rights").

In the absence of the aforementioned appropriate safeguards, UCB may – to the extent permitted under and in accordance with applicable data protection laws (including the GDPR) - rely on a derogation applicable to the specific situation at hand (e.g. the data subjects' explicit consent, the necessity for the performance of an agreement, the necessity for the establishment, exercise or defense of legal claims).