

# Acrivon's privacy policy

## 1. Scope of the privacy policy

1.1 Below, it is described how Acrivon AB, with the address Medicin Village, Scheelevägen 2, 223 81 Lund, Sweden, and Acrivon Therapeutics, Inc., with the address 480 Arsenal Way, Suite 100, Watertown, MA 02472, the United States, (jointly "Acrivon",

"us" or "we"), process personal data in relation to you.

1.2 Privacy matters are important to us and we prioritize your integrity. Therefore, it is important for us to protect your personal data and to ensure that our processing of the data is conducted in a correct and lawful way.

1.3 In this privacy policy, we explain which types of personal data we may process and for what purpose we process such data. We also detail our processing of personal data as well as what your choices and rights are in relation to such processing. We kindly ask you to carefully read this privacy policy and acquaint yourself with its content.

1.4 Please note that this privacy policy applies to processing over which Acrivon is the controller. This means that we are responsible for the handling and processing of your personal data. It also means that you should turn to us with questions and comments, or if you wish to enforce any of your rights in relation to our processing of your personal data.

1.5 Generally, the Acrivon group entity that you enter into an agreement with, or otherwise have contact with, is the data controller of your personal data. However, personal data is shared within the Acrivon group and, thus, other Acrivon group entities may also act as data controller with regards to your personal data. In such a case, the receiving Acrivon group entity is the responsible data controller of your personal data for the purpose of which the data was received. Sharing of personal data within the Acrivon group is carried out for the purpose of centralizing and streamlining Acrivon's business operations. The sharing of personal data is carried out on the basis of Acrivon's legitimate interest to maintain an effective business structure. Regardless of which Acrivon group entity that is the data controller in relation to a specific processing of personal data, the processing is conducted in accordance with the privacy policy, and any questions you have regarding the data processing can be submitted to our data protection officer at [kmasson@acrivon.com](mailto:kmasson@acrivon.com).

## 2. Processed personal data

2.1 We may process the following personal data attributable to you as a contact at a company that we cooperate with, such as healthcare providers, customers and suppliers:

- (a) name;
- (b) title;

- (c) company;
- (d) company address;
- (e) e-mail address;
- (f) phone number; and
- (g) e-mails and other types of correspondence.

2.2 We may process the following personal data attributable to you who visit the Acrivon website, (the “Website”):

- (a) name;
- (b) e-mail address; and
- (c) e-mails and other types of correspondence.

2.3 We may process the following personal data attributable to you who visit or contact us through our social media channels or otherwise:

- (a) name; and
- (b) any other data you chose to share with us when contacting us through our social media channels or otherwise.

2.4 We may process the following personal data attributable to you as a job applicant:

- (a) name;
- (b) e-mail address;
- (c) phone number;
- (d) CV;
- (e) cover letter; and
- (f) e-mails and other types of correspondence.

2.5 We may also process the following personal data attributable to you who are an investor in Acrivon:

- (a) name;
- (b) title;
- (c) company;
- (d) company address;
- (e) e-mail address;
- (f) phone number;
- (g) address;
- (h) investment terms;

- (i) personal identification number; and
- (j) e-mails and other types of correspondence.

### **3. The purpose and legal grounds of the processing**

- 3.1 We process personal data attributable to you as a contact at a company that we cooperate with for the purpose of, and based on our legitimate interest in, contacting you and administering contracts with the company that you are a contact for. The data may also be processed due to legal obligations, such as relating to bookkeeping.
- 3.2 We process personal data attributable to you who visit the Website for the purpose of, and based on our legitimate interest in, replying to your questions, comments and requests.
- 3.3 We process personal data attributable to you who visit or contact us through our social media channels or otherwise for the purpose of, and based on our legitimate interest in, informing you about our products and business, and for replying to any posts you make through our social media channels. We ask you to refrain from submitting data on your health and other sensitive data in your correspondence with us. If you publish such data on our social media channels anyway, you are deemed to have manifestly made such data public, and it may be processed by us for the purpose stated above.
- 3.4 We process your personal data attributable to you as a job applicant for the purpose of, and based on our legitimate interest in, facilitating and following up on job applications. In case you wish not to apply for a specific position or wish to enable us to keep your application for future job openings, such processing is based on your consent.
- 3.5 Finally, we process personal data attributable to you who are an investor in Acrivon for the purposes of, and based on our legitimate interest in, administering our contract, paying compensation and for communicating with you. If you are a private investor, the legal basis is that the processing is necessary for the performance of our contract with you. Personal identity number is processed as is it clearly motivated for the purposes of certain identification in connection with entering into an agreement with a board member or investor. The data may also be processed due to legal obligations, such as relating to bookkeeping.

### **4. Storage of personal data**

- 4.1 We store your personal data as long as necessary for us to fulfil the purpose of the processing. We will, however, always process your personal data to the extent and during the period of time that we are required to by law.

- 4.2 Subject to 4.1,
- (a) data relating to you who are a contact person for a company that we cooperate with is kept for as long as needed to administer Acrivon's business relationship with the company, including administering any contracts;
  - (b) data relating to you who contact us through the Website will be kept until the matter has been closed;
  - (c) data relating to you who contact us through our social media channels will be kept until you delete your post or two years has passed, whichever occurs first;
  - (d) personal data on job applicants is only kept for the term of the recruitment period or, if you have provided your consent to it, until the consent is withdrawn, but for a maximum of two years; and
  - (e) data relating to you who are an investor is kept until you are no longer an investor.
- 4.3 If your personal data is no longer necessary for us in order to fulfil the purpose of the processing, or if the processing for any other reason is no longer allowed, the data will be anonymized or deleted.

## **5. Recipients**

5.1 We may disclose your personal data to the following categories of recipients:

- (a) to our group companies, as described in 1.5 above;
- (b) to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- (c) to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this privacy policy; and
- (d) to any other person with your consent to the disclosure.

5.2 We may also disclose your personal data with our processors, for example group companies and companies providing hosting services or IT- and cloud services. In such cases, data processing contracts will be entered into to make sure that your personal data is processed only in accordance with this privacy policy.

5.3 Your personal data may be transferred to a country outside of the EU/EEA. If your personal data are transferred to a country outside the EU/EEA we will provide adequate safeguards to protect your personal data, e.g. that the receiving

country has an adequate level of protection. Transfers to Acrivon Inc. are conducted on basis of standard contractual clauses issued by the EU Commission. To obtain a copy of other safeguards applied, please contact us at the e-mail address stated below.

## **6. Your rights**

- 6.1 You have the right to receive confirmation on whether or not we process personal data concerning you, and in such cases get access to such personal data and also information regarding the personal data and how we process it.
- 6.2 You have the right to have inaccurate personal data concerning you rectified without undue delay. Taking into account the purposes of the processing, you also have the right to have incomplete personal data about you completed.
- 6.3 You have, under certain circumstances, the right to have personal data concerning you erased, for example if the personal data is no longer necessary in relation to the purposes for which it was collected or if the personal data have been unlawfully processed.
- 6.4 In some circumstances you have the right to obtain restriction of the processing of your personal data. For example if you contest the accuracy of the personal data, you can also require that we restrict the processing of your personal data for such a period that enables us to verify the accuracy of the personal data.
- 6.5 You have the right to object to processing of your personal data that is based on our legitimate interests. If this is done, we must provide compelling legitimate grounds for the processing which outweigh your interests, rights and freedoms, in order to proceed with the processing of your personal data.
- 6.6 You have the right to object to our processing of your personal data to the extent such data is processed for direct marketing. Upon such objection, we will no longer process your personal data for that purpose.
- 6.7 You have the right to withdraw a consent provided by you at any time by contacting us. If your consent is withdrawn, we will no longer process your personal data for the purpose that you had given your consent to.
- 6.8 You have the right to receive the personal data relating to you and that you have provided to us, in a commonly used electronic format. You have the right to transmit that data to another controller (data portability).
- 6.9 If you have any comments on our processing of your personal data, you are welcome to contact us. You also have the right to lodge a complaint to the Swedish Data Protection Authority (*Sw. Datainspektionen*).

## **7. Additions and amendments**

We may make additions and amendments to this privacy policy. If we do so, we will publish the amended policy on the Website. In such case, we kindly ask you to carefully review the updated privacy policy.

**8. Contact us**

To update, correct or erase data we have about you or to enforce your rights as described above, you are welcome to contact our data protection officer at [kmasson@acrivon.com](mailto:kmasson@acrivon.com).

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*This privacy policy enters into force on 1 August 2018*