

Information Release Notice

This notice and consent form (“Notice”) provides you with information on how Xentria, Inc. (“Xentria,” “we” or “us”), will process your personal data in connection with our Connect platform. The online questionnaire (“Survey”) will ask you various questions related to your health such as:

- various health conditions you may have;
- medications you may be taking or have taken in the past; and/or
- other relevant information.

We ask these questions to see if you may qualify for a clinical trial being conducted by Xentria.

At the end of the survey, you will have the option to provide your contact information and release your answers to the Survey for review and follow-up.

If at the end of the Survey, you decide that you would not like us to share any identifiable information about you, simply exit the Survey without submitting the Survey. We will retain certain responses, but this data is anonymized and you will not be identifiable from the information we collect.

If at the end of the Survey, you would like to be considered for a trial, we will ask you to provide your consent to Xentria collecting and sharing your information provided in the Survey with various trial locations, which may include hospitals and medical institutions (“Sites”). These Sites will use the personal data you provide to determine if you are a candidate for a trial and will contact you directly regarding enrolling in a trial.

You are not agreeing to participate in a clinical trial through this Notice.

Privacy Notice**1. Purposes of processing your data**

We will use your personal data to provide you with information about recruitment for a trial. In providing you with this information, Xentria may also need to share your personal data with the Site where a trial is taking place. Xentria may also process, transfer and disclose your personal data for the following additional purposes and to the following additional recipients:

- To determine whether you potentially qualify for a trial;
- To allow the Site to contact you regarding a trial should you qualify;
- To contact you about additional trial recruitment opportunities;
- For operational purposes, including to allow us to review the quality of our services and evaluate the performance of our staff;
- To share your enrolment status with recruitment partners through which you were referred, so those recruitment partners can avoid reaching out to you again if have already enrolled on a trial; and
- As otherwise required by applicable laws.

2. Legal basis for the processing

Xentria may process your personal data to comply with applicable laws and regulations. Our legal basis for this is compliance with a legal obligation to which we are subject, and the establishment, exercise or defense of legal claims (in accordance with Article 6 and Article 9 of the GDPR). The legal basis for all of our other processing of your personal data is your explicit consent (in accordance with Article 6 and Article 9 of the GDPR).

3. The categories of personal data concerned

Xentria process the following categories of your personal data:

- Your name;
- Your contact information (including email address, postcode and phone number);
- Your date of birth;
- Your Site preference for the trial;
- Your gender; and
- Various health data, which may include information about your health condition and medication history.

4. The recipients or categories of recipients of the personal data

For the purposes set out above, Xentria will transfer your personal data to the following recipients:

- The Site where the trial is taking place;
- Any recruitment partner through which you were referred (where applicable);
- Third parties who assist in providing our products and services and administering our business. These include IT and marketing technology host suppliers, web and data hosting providers, mailing houses, ad servers, sales platform providers and communication tool providers; and
- Companies that are part of Xentria's corporate group.

We only share your personal data with third parties if and to the extent it is necessary for them to provide our services related to the Connect Platform to you.

5. Transfers of your personal data

Xentria will process your personal data in the United States. The data protection laws of the United States may not be equivalent to those in your country of residence.

However, we take steps to ensure that your personal data continues to be treated in accordance with this Notice and applicable data protection laws, regardless of where your personal data are processed. Where relevant, we enter into EU standard contractual clauses (or equivalent measures) with the party outside the EEA receiving the personal data. A copy of the relevant standard contractual clauses is available upon request.

6. The period for which the personal data will be stored

We will retain your personal data for as long as you are a participant in the program unless we need to retain your personal data for a longer period to meet our legal requirements or to defend or exercise our legal rights. In these cases, we will retain your personal data only for the period necessary for us to pursue the relevant purpose. Where required by local laws, your data will be blocked during this period.

When we no longer need to use your information or it is determined that you do not qualify for the trial, we will take steps to promptly anonymize it so that you can no longer be identified from it.

7. Your rights to access, rectify, restrict or delete your personal data, and withdraw your consent

Data protection laws provide various rights for individuals in relation to their personal data. These rights are subject to certain limitations. To make a request you can contact Xentria's Privacy team via our online privacy form and submitting a request here. These rights include:

- Access. You have the right to request a copy of the personal data we are processing about you, which we will provide back to you in electronic form. This right may be subject to certain limitations in your country.
- Rectification. You have the right to have incomplete or inaccurate personal data that we process about you rectified.
- Deletion. You have the right to request that we delete personal data that we process about you. However, this right does not apply in certain circumstances, such as if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- Restriction. You have the right to request that we restrict our processing of your personal data where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose. Where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it, we would take steps to restrict the processing of this data.
- Portability. You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller in certain circumstances, including where this is personal data which you have provided to us and if we are processing that data on the basis of your consent.
- Withdrawing Consent. Where we process personal data on the basis of your consent, you have the right to withdraw your consent. This withdrawal will not affect the lawfulness of our processing prior to any withdrawal.
- Processing of your personal data after your death. In some countries such as France, you have the right to provide (directly to us or to a trusted third party) guidelines regarding the processing of your personal data after your death.

8. The right to lodge a complaint with a supervisory authority

You have the right to file data protection complaints with your national (or in some countries, regional) data protection authority.

9. Absence of statutory or contractual requirement to provide any personal data

There is no statutory or contractual requirement or other obligation to provide any personal data but failing to do so means that you will not be able to receive information about a trial or be connected to Sites by Xentria for potential participation in the Study.

I acknowledge that I may withdraw my consent at any time by contacting Xentria's privacy team at info@xentria.com.