PRIVACY POLICY

Last updated: January 17, 2024

In connection with the access, consultation, browsing and use of the website https://www.htlbiotech.com (hereinafter referred to as the "Website") and the services it offers, HTL processes your personal data.

HTL takes your privacy and your personal data seriously. As such, in our data privacy policy, we want to inform you of:

- the legal basis and the purposes of the processing of your personal data; and
- your rights and our obligations in relation to such processing.

If you have any questions or concerns regarding this data privacy policy, our contact information is as follows: <u>dpo@htlbiotech.com</u>.

This data privacy policy is separate from our cookies policy. For more information on how we use cookies and, in particular, on how to object to these cookies, please consult our <u>Cookies Policy</u>.

1. WHICH PERSONAL DATA DO WE COLLECT?

In connection with the access, consultation, browsing and use of the Website and the services it offers, you may be required to provide HTL, in its capacity as data controller, with your personal data.

When visiting the Website or using the services it offers, you will sometimes provide your personal data to us, such as:

- first name;
- last name;
- email address;
- function;
- company;
- business sector;

• your message.

Some personal data are mandatory, others are optional, in order to access or benefit from certain services on the Website, such as contacting us or email alerts forms. The mandatory or optional nature of the data is specified at the time of collection. In the absence of communication of mandatory personal data, HLT will not be able to respond to your request.

As you navigate through the Website or use the services it offers, certain personal data are collected automatically about your device and browsing activities, such as:

- IP address;
- location data;
- operating system;
- browser type;
- browser language;
- unique device identifiers;
- date and time you visited the website;
- bug or any other error reports;
- session data such as session ID and length of access;
- pages you viewed on the website.

2. FOR WHICH PURPOSES AND HOW DO WE PROCESS YOUR PERSONAL DATA?

HTL does not process your personal data unless there is a specific and legitimate purpose as well as a legal basis. The purposes and legal bases for the processing of your personal data as described are outlined in the table below:

Purpose of processing	Legal bases
To respond to your message	Legitimate interest in responding to your message
To manage and improve our website and the services it offers	Legitimate interest in improving your user experience

To send you our email alert (publications, press releases and information about HTL's activity)

Express consent

To fulfill our legal obligations

Compliance with a legal obligation

3. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Your personal data will not be transmitted or made accessible to any third party, except to HTL's authorized employees and its service providers (such as IT systems providers, hosting providers, consultants, etc.) for technical or logistical reasons only, being stated that each of these service providers are bound by data protection and confidentiality obligations in order to protect your personal data.

In the event of a proven infringement of legal or regulatory provisions, this information may also be disclosed upon express and reasoned request of the administrative and judicial authorities.

If any, we may share your personal data with other third parties, for example in the context of the possible sale, merger and/or restructuring of the business, and this, only for the needs of the operation and in accordance with our obligation of confidentiality.

4. ARE THERE ANY INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA?

The storing and processing of your personal data as outlined above will sometimes require that your personal data be transferred and/or stored outside of your country or region of residence. Legislation regarding the protection of personal data of such third countries may differ from those of your country or region or residence, in particular regarding the internal management of services and commercial or marketing communications.

In the case that the country of destination is outside of the EU and does not provide a level of protection of personal data equivalent to that of the EU, we will take necessary measures, either through an adequacy decision by the European Commission, or, in the absence of such a decision, through appropriate safeguards such as the European Commission Standard Contractual Clauses. You can obtain documentation regarding such measures by contacting <u>dpo@htlbiotech.com</u>.

5. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data will only be stored as long as necessary to fulfil the purposes for which it was collected or to comply with legal or regulatory requirements. In particular:

- data collected via the email alerts forms will be kept until you unsubscribe and for a period of three (3) years for commercial prospection by e-mail and, beyond, for a period not exceeding the applicable statutory limitation periods;
- the data collected via the contact form will be kept until the complete processing of your request and, beyond, for a period not exceeding the applicable statute of limitation period.

More generally and unless otherwise stated in this policy, your personal data will be kept during our business relationship and, beyond, three (3) years for promotional purposes and five (5) years for evidentiary purpose.

6. HOW DOES HTL PROTECT YOUR PERSONAL DATA?

HTL has implemented adequate technical and organizational measures to protect your personal data against any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data. These security measures have been implemented taking into account the state of the art of the technology, the costs of implementation, the risks presented by the processing and the nature of the personal data.

HTL guarantees that its employees and anyone else who may process your personal data comply with the internal rules and procedures relating to the processing of personal data, especially the technical and organizational security measures put in place to protect your personal data. In case of personal data breach, we will inform you, as well as the relevant national data protection authority, in accordance with the applicable regulation.

7. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

In accordance with the personal data protection regulation applicable, you have the right to access, rectify, delete, if any limit and ask for the portability of your personal data as well as a right to object to the processing of your personal data. You also have the right to withdraw your consent where we obtained your prior consent to process your personal data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).You may define guidelines for the use of your personal data in the event of death.

These rights can be exercised directly with us, by completing the form to be sent the following address: <u>dpo@htlbiotech.com.</u>

For security reasons and to avoid any fraudulent request, we may be required to provide proof of identity with the request. After the request has been processed, this receipt will be destroyed.

You finally have the right to lodge a complaint at the relevant supervisory data protection authority.