

CUSTOMER PRIVACY POLICY



CONTENT

| | | |
|-----------|---|-----------|
| 1. | Hyloris commitment to privacy | 4 |
| 1.1. | Purpose of the policy | 4 |
| 1.2. | Scope of the Policy | 4 |
| 1.3. | Policy of Compliance | 5 |
| 2. | Definitions | 5 |
| 3. | Collection of personal information | 6 |
| 3.1. | What categories of Personal Information does Hyloris collect? | 6 |
| 3.2. | How does Hyloris collect Personal Information? | 6 |
| 4. | Processing of your personal information | 6 |
| 4.1. | Purposes and legal basis of the processing of your personal information | 6 |
| 4.1.1. | Current purposes and legal basis | 6 |
| 4.1.2. | Future purposes | 7 |
| 4.2. | How long will your personal information be retained? | 7 |
| 4.3. | To whom will your Personal Information be disclosed? | 7 |
| 4.4. | Transfer of Personal Information outside of the European Union | 7 |
| 4.5. | Cookies | 7 |
| 4.6. | Security | 8 |
| 5. | Your rights | 8 |
| 5.1. | What are your rights ? | 8 |
| 5.2. | How to exercise your rights ? | 8 |
| 6. | Future modifications | 10 |
| 7. | Any questions? | 10 |

1. HYLORIS COMMITMENT TO PRIVACY

1.1. Purpose of the policy

Hyloris Pharmaceuticals SA and its subsidiaries (**Hyloris**) are committed to protecting your personal information and maintaining the accuracy, confidentiality and integrity thereof. This privacy policy (**Policy**) describes:

- (i) the personal information that Hyloris collects from or about you,
- (ii) how Hyloris uses your personal information and for which purposes,
- (iii) to whom Hyloris discloses the information.

You will also find herein all relevant information on your rights and how to exercise these rights.

1.2. Scope of the Policy

The Policy applies to all data processing of your Personal Information that are collected and further processed as a result of you being a former, existing or potential customer of Hyloris.

The Policy applies to all the companies of the Hyloris Metrology group, which includes Hyloris Pharmaceuticals SA, with its offices at Boulevard Gustave Kleyer 17/001, 4000 Liège , Belgium and its subsidiaries, which are located in different Member States of the European Union as well as in the United States of America and Canada. These group companies and subsidiaries are:

| | |
|--|--|
| Hyloris Developments SA Boulevard Gustave Kleyer 17 4000 Liège Belgium Tel.: 00 32 4 34 60 207 | RTU Pharma SA Boulevard Gustave Kleyer 17 4000 Liège Belgium Tel.: 00 32 4 34 60 207 |
| Dermax SA Boulevard Gustave Kleyer 17 4000 Liège Belgium Tel. : 00 32 4 34 60 207 | |

1.3. Policy of Compliance

It is Hyloris's policy to comply with all privacy legislation within each jurisdiction in which it operates. Hyloris implements additional procedures, standards, and policies wherever needed to meet these requirements.

Hyloris makes sure that its employees and any of its contractors, suppliers, agencies, temporary workers, or any other parties acting on Hyloris's behalf (collectively, **External Parties**) who collect or manage Customers' Personal Information to abide by the terms described in this notice, whether they are utilizing Hyloris and/or their own electronic systems and data management tools.

Hyloris and its employees are responsible for ensuring that any External Parties they work with in support of Hyloris's operations comply with this policy and with any additional specific standards and procedures that are applicable.

2. DEFINITIONS

For the purpose of this Policy the following terms and expressions shall have the meanings specified or referred to hereafter:

Customer(s): means any individual, acting in its own name or on behalf of a legal entity to whom Hyloris provides its products or services.

Data Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Personal Information: means any information relating to an identified or identifiable individual.

Process or Processing: means any operation or set of operations which is performed on Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special Categories of Personal Data: means personal Information revealing race, ethnicity, political views, religion, health, sexual orientation, trade union membership, genetic or biometric data, information about criminal convictions and offenses, and as otherwise defined by law.

3. COLLECTION OF PERSONAL INFORMATION

3.1. What categories of Personal Information does Hyloris collect?

Hyloris collects the following categories of information from or about you:

- identification data on the contact person (e.g., name, email address, work address, work phone number); and
- e-identification data on the contact person (e.g., IP address, cookies);
- occupation and employment of the contact person;
- contractual history consumption habits.

3.2. How does Hyloris collect Personal Information?

Hyloris may collect your Personal Information:

- directly from you,
- from third parties such as Hyloris's official agents and resellers,
- by purchasing contact lists from third parties.

4. PROCESSING OF YOUR PERSONAL INFORMATION

4.1. Purposes and legal basis of the processing of your personal information

4.1.1. Current purposes and legal basis

| Purpose | Legal ground |
|--|---|
| <i>Hyloris processes your Personal Information to:</i> | <i>These processing activities are necessary for:</i> |
| - Communication of information on the products and services upon request of a customer | - to take necessary steps prior to entering into a contract |
| - the management of customers | - the performance of the contract |
| - the administration of orders and deliveries | - the performance of the contract |
| - the promotion of our products | - the legitimate interests pursued by Hyloris, namely the promotion of its products and services. |

Your Personal Information is not used in any automated decision-making, including profiling.

If you do not wish to receive any promotional messages, you object thereto, free of charge, when your Personal Information is collected, and each time that a message is sent, by sending an e-mail to: Koenraad.vanderelst@Hyloris.com.

4.1.2. Future purposes

If Hyloris considers processing your Personal Information for other purposes than those mentioned under 4.1.1, Hyloris will inform you thereof before starting to process your Personal Information for the new purpose.

4.2. How long will your personal information be retained?

Your Personal Information will be for a maximum of 5 years after your last order has been completed.

4.3. To whom will your Personal Information be disclosed?

For the purposes described above (see 4.1) Hyloris may disclose your Personal Information to:

- senior managers, our marketing department staff, our sales and services department staff;
- public services;
- our official resellers and agents;
- other Hyloris entities.

Hyloris requires that any External Parties to whom your Personal Information is disclosed provides the same level of protection as applied by the Company when handling your Personal Information.

We contractually require data processors to only process the data in accordance with our instructions and to secure the data. These data processors may not use or disclose the information, except as authorized by Hyloris, and/or to comply with legal requirements.

There are certain situations where you will share personal information directly with service providers associated with Hyloris, where Hyloris does not control how your data is processed. In those situations, please ensure you read and understand the privacy policies and practices of such providers.

4.4. Transfer of Personal Information outside of the European Union

Hyloris operates globally and your Personal Information may be transferred, from time to time, to other entities of the Hyloris Pharmaceuticals group, including to its headquarters in United State of America.

Where your Personal Information is transferred to entities located in countries that are not deemed to provide the same level of protection as the European Union (including, Japan, the United States and Canada), Hyloris has ensured that necessary guarantee are offered by entering into the European Commission approved standard contractual clauses (SCC) with relevant companies. You may obtain a copy of these SCC by sending an email to Koenraad.vanderelst@Hyloris.com.

4.5. Cookies

Our website <https://www.Hylorismetrology.com> (the **Website**) uses cookies or similar technology to collect information about your access to the Website. You may consult our

Cookie Policy on our website <https://www.Hylorismetrology.com/en-gb/Hyloris-metrology-nv/cookie-policy>.

4.6. Security

Hyloris implements appropriate physical, administrative and technical measures, such as pseudonymizing, encryption and access controls, designed to protect Personal Information of Customers against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access or use, and all other unlawful forms of processing.

5. YOUR RIGHTS

5.1. What are your rights ?

You have the right to request access to your Personal Information at any time and request that inaccurate, outdated or no longer necessary information be corrected, erased or restricted.

You may obtain, within the limits of the applicable data protection regulations:

- the erasure of your data, in particular (i) if it is no longer necessary for the purpose described in point 4.1.1, (ii) if you have withdrawn your consent and the processing is no longer necessary for the performance of the contract or (iii) if you object to the processing of your data (see below),
- the restriction of the processing of your data (i) if you challenge the accuracy of your data, for the time necessary for Hyloris to verify the basis of your claim, (ii) if the processing is considered illegal, but you do not want your data to be deleted, (iii) if Hyloris no longer needs your data but you wish to retain it for the purposes of determining, exercising or defending your rights, (iv) if you object to the processing of your data (see below), for the time necessary for Hyloris to verify the basis of your request.

You may object to the use of your data at any time, provided that your request is justified on your own grounds, within the limits of applicable data protection regulations.

You may receive or have your data transmitted to another data controller in a structured, commonly used and readable format.

5.2. How to exercise your rights ?

You can exercise the rights described above by sending a letter by email to Koenraad.vanderelst@Hyloris.com, indicating your decision to exercise any of those rights or by sending us the form that is available on the following URL: <https://www.Hyloris.com/gdpr>. After Hyloris has received your letter, it will answer you as soon as possible.

If you are not satisfied with our response to your request with regard to your exercise of those rights, you may file a complaint with the data protection authority in the country where you have your habitual residence, your place of work or where the alleged infringement of your rights occurred. The coordinates of those authorities are described below.

Belgium

Commission de la protection de la vie privée

Rue de la Presse 35

1000 Bruxelles

Tel. +32 2 274 48 00

Fax +32 2 274 48 10

e-mail: commission@privacycommission.be

Website: <http://www.privacycommission.be/>

France

Commission Nationale de l'Informatique et des Libertés - CNIL

8 rue Vivienne, CS 30223

F-75002 Paris, Cedex 02

Tel. +33 1 53 73 22 22

Fax +33 1 53 73 22 00

e-mail:

Website: <http://www.cnil.fr/>

Germany

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit

Husarenstraße 30

53117 Bonn

Tel. +49 228 997799 0; +49 228 81995 0

Fax +49 228 997799 550; +49 228 81995 550

e-mail: poststelle@bfdi.bund.de

Website: <http://www.bfdi.bund.de/>

The Netherlands

Autoriteit Persoonsgegevens

Prins Clauslaan 60

P.O. Box 93374

2509 AJ Den Haag/The Hague

Tel. +31 70 888 8500

Fax +31 70 888 8501

e-mail: info@autoriteitpersoonsgegevens.nl

Website: <https://autoriteitpersoonsgegevens.nl/nl>

United Kingdom

The Information Commissioner's Office

Water Lane, Wycliffe House

Wilmslow - Cheshire SK9 5AF

Tel. +44 1625 545 745

e-mail: international.team@ico.org.uk

Website: <https://ico.org.uk>

6. FUTURE MODIFICATIONS

Hyloris reserves the right to modify this notice as needed to comply with changes in laws, regulations, practices and procedures, or to respond to new threats or new requirements imposed by data protection authorities.

7. ANY QUESTIONS?

If you have questions about your Personal Information as a Customer, or have concerns about a potential data breach, please email us at: Koenraad.vanderelst@Hyloris.com.