

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

The purpose of this Privacy Notice is to provide information concerning the collection and use of your personal data in relation to clinical trials sponsored by Retension Pharmaceuticals, Inc. (“Sponsor”) and managed by its designated contract research organisation. We take privacy, data protection and our legal obligations very seriously. This notice is applicable to all global regions where you may join the study. We are committed to being transparent with you about how we use personal data. This Privacy Notice aims to describe our privacy practices in a clear, accessible and easy to understand way and to let you know how you can exercise your rights in relation to your personal data.

What is Personal Data?

- personal data is any information that directly identifies you, such as your name and email address, or that indirectly identifies you, for example a phone number or device identifier.

What Personal Data is collected?

In connection with the Study, personal data may be collected from members of the site staff by or on behalf of Sponsor or Worldwide, in particular:

- Name and contact details
- Office or practice location, type, and amenities
- Curriculum vitae, including any licenses, certifications and professional affiliations
- Declaration of financial interests, if applicable
- Affiliation with a site management organization (“SMO”)
- Financial information collected for payment
- Historical and current information regarding participation and performance in clinical studies
- Legal standing information (including passport number, utility bill as proof of address, and / or letter of good standing)
- Employer references
- Training records
- Authentication information for entering data into the eCRF (electronic case report form).

To effectively administer your participation in the Study and meet the requirements of clinical regulation, you must provide the above information if you chose to be. involved in the Study. If you chose to not provide the above information, we will not be able effectively administer your participation in the Study and meet the requirements of clinical regulation.

Purpose and Lawful Bases for Processing

- 1) **Purpose:** To administer the clinical trial and protocol, including performance of the clinical trial contract and payments, monitoring and auditing, and maintenance of the trial master file (TMF).
Lawful Basis: Processing for this purpose is necessary for Sponsor ‘s legitimate interests in administering the clinical trial.
- 2) **Purpose:** To conduct biomedical research and development to determine therapeutic suitability of the study drug and apply for product registration.

Lawful Basis: Processing for this purpose is necessary for Sponsor 's legitimate interests in performing scientific research.

- 3) **Purpose:** To comply with laws and regulations for the clinical trial and for the use of the results, such as applying for product registration.

Lawful Basis: Processing for this purpose is necessary for compliance with a legal obligation.

To whom could personal data be disclosed?

In connection with the above purposes, Retension Pharmaceuticals, Inc. may disclose the personal data to the following categories of recipients:

- 1) competent authorities and ethics committees (EC) or instructional review boards (IRBs)
- 2) public clinical databases such as clinicaltrials.gov
- 3) third parties who process the personal data on behalf of the Sponsor (including designated Contract Research Organization)
- 4) Sponsor affiliates
- 5) Sponsor processors and third parties

In rare cases the personal data may be used in connection with internal or external investigations or legal proceedings, in which case the personal data may be disclosed to law enforcement agencies or other governmental authorities and may also be shared with advisors of the Sponsor.

Sponsor may also sell, transfer or otherwise share some or all of their business or assets, including personal data, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganisation or sale of assets, or in the event of bankruptcy or dissolution.

We endeavour to employ the appropriate safeguards for cross-border transfers of personal data, as required by applicable local law. In connection with any of the above purposes, your personal data may be transmitted outside of your country to countries that do not offer the same level of protection of your personal data. We will take reasonable steps to ensure these procedures comply with applicable data protection laws, including our obligation to ensure that the recipient of the Personal Information is bound by legally enforceable obligations to provide such Personal Information a standard of protection that is at least comparable to the protection under applicable data protection laws. If you would like additional information regarding the safeguards that are put in place you may contact the Sponsor's representative at privacy@retensionpharmaceuticals.com.

Personal Data Retention:

We endeavour not to retain personal data in a form which permits identification of individuals for longer than is necessary for the purposes for which that data is processed. Your personal data is retained only for as long as necessary to fulfil the purposes we collected it for, or as otherwise required by applicable law. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

How we protect your data:

To protect personal data from loss, or unauthorized use, access or disclosure, we use reasonable and appropriate security measures designed to protect the security of your Personal Data. Organisational and technical measures have been implemented to protect the security of your personal data, including appropriate security measures to prevent your personal data from being lost, used, accessed, altered or disclosed in an unauthorised way. These

measures have been implemented to protect against a suspected data security breach. Where we become aware that your Personal Information has been compromised by a data breach (as defined by the applicable data protection laws), we will make reasonable efforts to notify you in a timely manner.

What are the rights to personal data?

Depending on your residence and subject to applicable law, you may be entitled to access your personal data or object to or request limitation of further processing. You may also be entitled to have your personal data deleted, corrected, or transferred. If you have a concern, you also have the right to lodge a complaint with your local supervisory authority responsible who regulates compliance with data privacy. If you would like to exercise or inquire more about your data subject rights, you may submit a data subject access request by contacting:

privacy@retensionpharmaceuticals.com

If you have any questions, concerns or complaints about this Privacy Notice or our data protection practices, please do not hesitate to contact us at the following: privacy@retensionpharmaceuticals.com