

## HEALTHCARE PROFESSIONAL PRIVACY NOTICE

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### 1. Introduction

This Privacy Notice (this “Notice”) is made available by Sirius Therapeutics, Inc. (“Sirius”, “we”, “our” or “us”) and its affiliated entities to Healthcare Professionals (HCP) we engage with (“you”, “your” or “user”). This Notice is intended to assist HCPs in understanding how we collect, process, secure, and transfer your Personal Data. We also describe how you can contact us to learn more information about our privacy practices.

### 2. Link with other Privacy Notices

Other individuals interacting with Sirius Therapeutics (job applicants, candidates, vendors and business partners) are provided with separate information about how we handle their personal information. For example, Sirius Therapeutics maintains a website Privacy Notice, available at: <https://www.siriusrna.com/privacy/>

It is important that you read this Notice together with any other privacy notice that we may provide you with so that you are fully aware of how and why we are using your data. This Notice supplements any other privacy notices and privacy policies that we may provide to you and is not intended to supersede them.

### 3. Definitions

For the purposes of this Sirius Therapeutics HCP Privacy Notice:

**Affiliate** means an entity that controls, is controlled by, or is under common control with a party, where “control” means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

**Aggregated Data** means summarised data derived from your Personal Data. Examples are statistical or demographic data. It is not considered Personal Data in law as this data will **not** directly or indirectly reveal your identity.

**Company** (referred to as either “Sirius Therapeutics”, “Sirius”, “the Company”, “We”, “Us” or “Our” in this Agreement) refers to Sirius Therapeutics Inc, 11760 Sorrento Valley Road, Suite K, L, M, San Diego, California 92121, USA and Affiliates.

**Data Controller**, for the purposes of both UK and EU GDPR, refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data. For the purpose of both UK and EU GDPR, the Company is the Data Controller.

**Data Processor**, for the purposes of both UK and EU GDPR, refers to the Company's Service Providers.

**Data Protection Legislation**, in the United Kingdom means the Data Protection Act 2018 ('DPA 2018'), United Kingdom General Data Protection Regulation ('UK GDPR'), the Privacy and Electronic Communications (EC Directive) Regulations 2003 ('PECR') and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union (EU) or comprises the data of people in the European Union, it also includes the General Data Protection Regulation (Regulation (EU) 2016/679) ('EU GDPR') as well as any local data protection implementation laws. This includes any replacement legislation coming into effect from time to time. Additional Data Protection Legislation may also apply, depending on your jurisdiction.

**Personal Data** is any information that relates to an identified or identifiable individual. For the purposes of both UK and EU GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

**Process** (or “**Processing**”) means any operation or set of operations which is performed on Personal Data or sets of Personal Data, whether by automated means, such as collection, use, and erasure.

#### 4. Who we are

Sirius Therapeutics is the **Data Controller** and is responsible for the processing of your Personal Data.

#### 5. The data we collect about you

Clinical trial regulations such as those associated with the ICH/GCP Guidelines and those adopted by local jurisdictions oblige the Sponsor and those acting on the Sponsor's behalf to collect personal data from individuals who participate in the conduct of a clinical trial to prove their qualifications, and to conduct various clinical trial operations.

The personal information you provide will become part of the clinical trial databases and paper files as needed for the implementation, performance and record-keeping (archiving) of the study.

Sirius Therapeutics will collect and may utilize your Personal Data for the purposes described below:

Category of Data	Purpose for Data Processing
<b>Contact details</b> (example: your name, nationality, postal address, telephone number, e-mail address)	<ul style="list-style-type: none"> <li>▪ To communicate with you about any proposed clinical trial</li> <li>▪ To respond to your queries.</li> <li>▪ To allow and document the distribution of product samples to you.</li> <li>▪ To invite you to academic, scientific and promotional meetings, events and seminars linked to your medical expertise.</li> <li>▪ To enable us to send direct marketing to you regarding medical and scientific updates, corporate information and/or our products and services.</li> <li>▪ To ask you to participate in surveys.</li> <li>▪ To contact relevant professionals with a view to future collaboration or feasibility reviews.</li> <li>▪ To manage your participation in the study and the participation of the investigative site.</li> <li>▪ To support applications for approval of the product under investigation.</li> </ul>
<b>Compensation Information</b> (example: bank account details, financial information, salary and expenses details)	<ul style="list-style-type: none"> <li>▪ Payment of salary, expenses and invoices</li> <li>▪ For compliance with applicable laws, regulations, or other requirements such as tax reporting under local tax laws.</li> </ul>
<b>Employment history</b> (example: job titles, location of employment/workplace, employment history, working hours)	<ul style="list-style-type: none"> <li>▪ To retain information of relevant professionals with a view to future collaboration.</li> <li>▪ To ask relevant professionals and institutions if they wish to participate in clinical trials.</li> <li>▪ To assist with identification of any potential conflict of interests where you may have affiliations with specific institutions or entities.</li> </ul>
<b>Professional Credentials</b> (example: training records, qualifications and professional memberships)	<ul style="list-style-type: none"> <li>▪ To maintain a database of professionals working in areas of interest related to our research.</li> <li>▪ To ensure that the professionals hold appropriate qualifications and professional memberships to be involved with a clinical trial.</li> <li>▪ To allow us to assess and validate your professional expertise, competence and suitability for conducting and/or being involved in the clinical trial.</li> <li>▪ To allow us to verify you meet specific regulatory criteria.</li> </ul>
<b>Research-Related Data</b> (example: research interests and output)	<ul style="list-style-type: none"> <li>▪ This includes details about your professional involvement in other clinical trials, research results, previous studies, and areas of expertise to help us evaluate your suitability for specific clinical trials.</li> </ul>

	<ul style="list-style-type: none"><li>▪ To obtain your feedback and professional insights (including through advisory boards, market research and survey tools) on<ul style="list-style-type: none"><li>(i) what is important to you and/or your patients,</li><li>(ii) important trends in patient management in your area of expertise;</li><li>(iii) how Sirius Therapeutics and our products are perceived by you; and</li><li>(iv) how we can further evolve and customise our services and products</li></ul></li></ul>
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We also collect, use and share Aggregated Data for various purposes. For example, your website usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Notice.

We may receive information about you from other sources including business partners, third parties, affiliates, and publicly available information.

## 6. Legal basis for processing your Personal Data

We process your Personal Data using the following lawful bases:

- With your consent. For example, collecting your ethnicity information for DEI reporting purposes, where required. Where we do rely on your consent, you have the right to withdraw it at any time by contacting our Data Protection Officer via [dpo@siriusrna.com](mailto:dpo@siriusrna.com).
- Processing necessary for performance of a contract with you, including maintaining a professional relationship with you, payment of salary and expenses, managing your participation in the clinical trial, and/or in order to take steps at your request prior to entering into a contract.
- To comply with legal and regulatory obligations, including assessment of your potential participation in the study and/or the participation of the investigative site by reviewing your eligibility and qualifications and conducting screening measures or to support applications for approval of the product under investigation.
- Where processing your Personal Data is in your vital interest, or in the vital interest of another person.
- Where there is a substantial public interest in processing your Personal Data, such as for establishing, exercising, or defending against legal claims, or detecting fraud.
- Processing necessary for the purpose of the legitimate interests pursued by Sirius Therapeutics to conduct its business (including for research and development of new medicines creating value for people living with diseases in Sirius Therapeutics' therapeutic areas of interest), to manage our human and financial resources efficiently and for internal reporting purposes.

Providing your Personal Data to Sirius Therapeutics is voluntary but it is necessary if you are to take part in any of our clinical trial activities. Should you choose not to provide your Personal Data to us, your interaction with us may be adversely impacted, you cannot take part in any of our clinical trial activities, and we will not be in a position to perform a contract with you.

## 7. Disclosures of your Personal Data

Where necessary to fulfil the purposes described in this Notice, Sirius Therapeutics may

disclose your Personal Data to third-parties. Not all of these parties are located in the country where the clinical trial is conducted. Sirius Therapeutics may therefore transfer your Personal Data to locations outside of your country of residence for the purposes described in this Notice.

Whenever Sirius Therapeutics shares your Personal Data with third parties, such as companies acting as our authorised agents and service providers, these companies agree to use your Personal Data only for specified purposes and upon our instructions. Furthermore, the recipient will implement and maintain reasonable security procedures and practices appropriate to the nature of your information to protect your Personal Data from unauthorised access, destruction, use, modification or disclosure.

We will transfer and disclose your Personal Data to the following categories of recipients where it is lawful to do so, and subject to the implementation of appropriate safeguards:

Category of Third-Party	Purpose for Disclosure
Our Subsidiaries and affiliated entities	<ul style="list-style-type: none"> <li>▪ Internal business requirements</li> <li>▪ To perform our obligations to you</li> </ul>
Service Providers who work for, or provide services to us (including their employees, sub-contractors, officers, such as IT systems providers and IT contractors, payroll and HR system providers, employee expense management providers, pension administration / providers, benefits providers).	<ul style="list-style-type: none"> <li>▪ To support Sirius Therapeutics' commercial/business objectives.</li> <li>▪ IT performance-related monitoring, maintenance, or security.</li> <li>▪ Where we use third party services providers who process personal information on our behalf or provide services to us.</li> </ul>
Cloud storage solutions	<ul style="list-style-type: none"> <li>▪ To store Sirius Therapeutics data.</li> <li>▪ To ensure the safety and security of our data.</li> </ul>
Law enforcement, government, courts, regulators, governmental or quasi-governmental organisations, tribunals and arbitrators.	<ul style="list-style-type: none"> <li>▪ To comply with our regulatory and legal obligations.</li> <li>▪ Sirius Therapeutics' legal duty to assist with detecting fraud and tax evasion, financial crime prevention, regulatory reporting, litigation or defending legal rights.</li> <li>▪ For example, Sirius Therapeutics is required to provide immigration information to the relevant authorities for the purposes of preventing and detecting fraud or crime.</li> </ul>
Professional Advisors, such as insurers, accountants, auditors or lawyers	<ul style="list-style-type: none"> <li>▪ To provide professional/expert advice in connection with our business objectives where necessary in the course of the professional services that they render to us or in connection with the clinical trial.</li> </ul>
Other financial institutions, fraud prevention agencies,	<ul style="list-style-type: none"> <li>▪ To meet our legal, regulatory and compliance obligations.</li> <li>▪ For example, Sirius Therapeutics is required to provide tax-related information to the relevant authorities.</li> </ul>

tax authorities, trade associations, credit reference agencies and debt recovery agents.	
Any prospective or new Sirius Therapeutics companies (e.g. if we restructure, or acquire or merge with other companies) or any businesses that buy part of or all of Sirius Therapeutics (including the rights to the study drug and all related data)	<ul style="list-style-type: none"> <li>▪ In relation to compliance and completion of pre-merger or acquisition, consolidation, corporate divestiture, restructuring or liquidation/ dissolution due diligence.</li> <li>▪ If this occurs the new owners of the business will be permitted to use your information in the same or similar way as set out in this privacy notice.</li> </ul>
Potential or future employers	<ul style="list-style-type: none"> <li>▪ Where you have requested that we provide a reference for you to your new employer</li> </ul>
Other researchers, research institutions, collaborators, licensees, and strategic partners	<ul style="list-style-type: none"> <li>▪ Prior to and during your involvement in the clinical trial, to the extent that it is necessary for the satisfactory conducting of and completion of the clinical trial.</li> </ul>

## 8. International cross-border data transfers

Because Sirius Therapeutics operates globally, your data may be transferred outside of the country in which you interact with Sirius Therapeutics, including to countries whose data protection laws substantially differ from the country in which you work or reside and may not provide the same level of data protection as in your country of residence. To accomplish the purposes described in this Notice, we may also disclose and transfer Personal Data to personnel and other departments throughout Sirius Therapeutics, or to service providers and/or collaborators, licensees and strategic partners based overseas, to the extent that your Personal Data is shared with service providers, Sirius Therapeutics affiliates or other third parties processing Personal Data on our behalf, which are located outside your country of residence.

For example, your Personal Data may be transferred or accessed by Sirius Therapeutics' affiliate(s) in the United States of America.

Sirius Therapeutics shall seek to maintain confidentiality as required within the limits of local laws in these countries.

Whenever we are required to transfer your Personal Data out of the UK or EEA, we ensure that at least one of the following safeguards is implemented:

- transferring your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission<sup>1</sup> or the UK government<sup>2</sup>.
- using specific contracts approved which give Personal Data the same protection it has in Europe including standard data protection clauses approved by the European Commission<sup>3</sup> and/or the UK government<sup>4</sup> providing adequate protection of Personal Data.

Please contact us via our Data Protection Officer ([dpo@siriusrna.com](mailto:dpo@siriusrna.com)) if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA or UK.

## 9. Data security

Sirius Therapeutics will implement appropriate technical and organizational security measures necessary to adequately safeguard your Personal Data. These safeguards will include, for example:

### Security Measures

- Access to Personal Data is restricted and provided only where necessary, to those employees, agents, contractors and other third parties who have a business need-to-know.
- All employees handling Personal Data receive security and data protection awareness training, will only process your Personal Data on our instructions and are subject to a duty of confidentiality.
- Employees with access to Personal Data are given the least privilege required.
- We have robust procedures in place to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- A disciplinary policy is enforced to prevent unauthorised access.
- Where technically feasible, data is encrypted in transit and at rest.

## 10. Data retention

We will only retain your Personal Data for as long as required under applicable local, state, national and/or international laws, rules and/or regulations, which may be for a period of up to 25 years after completion of the clinical trial and to fulfil the purposes we collected it for, including for the purposes any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event where we receive a complaint and we reasonably believe there is a prospect of litigation in respect to our relationship with you, or there is an investigation and proceedings.

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<sup>1</sup> For more information, see: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

<sup>2</sup> For more information, see: <https://www.gov.uk/government/publications/uk-approach-to-international-data-transfers/international-data-transfers-building-trust-delivering-growth-and-firing-up-innovation>

<sup>3</sup> For more information, see: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers_en)

<sup>4</sup> For more information, see: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-data-transfers/international-data-transfer-agreement-and-guidance/>

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, regulatory, tax, accounting or other requirements.

Where we do not have a reason or legal obligation to retain your Personal Data, it will be deleted in accordance with the relevant section of our Data Protection Policy.

In some circumstances we will anonymise your Personal Data (so that it is no longer your personal information as it cannot be associated with you) for research or statistical purposes, in which case we may use and retain this information indefinitely without further notice to you.

## 11. Your legal rights

Subject to certain limitations and exclusions under applicable laws, you may be entitled to contact us and request to exercise your rights in respect of your personal data. You may have the right to request confirmation as to whether Sirius Therapeutics is processing your Personal Data, and if so:

- To request information relating to the categories of data involved, purposes of processing, recipients of your data, retention periods/criteria, and your rights as a Data Subject.
- To request access to your Personal Data that Sirius Therapeutics is processing.
- To request that Sirius Therapeutics rectifies any inaccurate or incomplete Personal Data that we are processing about you.
- To request erasure or restriction of processing of any Personal Data that Sirius Therapeutics is processing about you, subject to certain exceptions.
- To obtain a copy of your Personal Data in a commonly-used and machine-readable format and have it ported to another data controller.
- To object to the processing of, your Personal Data in certain circumstances.
- To request your information not be sold or otherwise disclosed to a third-party.
- To lodge a complaint with your local Data Protection Authority or Supervisory Authority.

To exercise any of the rights described above, please email us via [dpo@siriusrna.com](mailto:dpo@siriusrna.com) with a description of your request.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have explicitly notified you.

## 12. Changes to the Notice

We keep our privacy notices under regular review. We reserve the right, at our discretion, to change, modify, add or remove sections of this Notice at any time. You are encouraged to review this Notice from time to time for updates, or to contact Sirius Therapeutics for more information.

## 13. Your duty to inform us of changes

It is important that the Personal Data we hold about you is accurate and current. You are

responsible for making sure the information you give us is accurate and up to date. You must tell us if anything changes, as soon as possible.

#### **14. Providing Company with other people's data**

If you give us any Personal Data that does not relate to you (e.g., information about your colleagues, or next of kin/dependants), you must ensure that you have the required legal basis to collect and share their Personal Data. You must also provide them with a copy of this Notice, tell them what information you have given to us, and make sure they agree we can use it as set out in this Notice.

#### **15. Questions**

If you have any questions about this Notice, the use of your data, or if you would like to make a request to exercise your data protection rights, please contact the Data Protection Officer using the details set out below.

By email: [dpo@siriusrna.com](mailto:dpo@siriusrna.com)

By telephone: +4402037971289

By post: FAO Sirius Therapeutics Inc., Data Protection Officer, The DPO Centre Ltd., 50 Liverpool Street, London, UK, EC2M 7PR.

If you are in the EU or EEA, you can also contact our EU GDPR Representative by one of the following means:

By email: [EUrep@siriusrna.com](mailto:EUrep@siriusrna.com)

By post: FAO Sirius Therapeutics, EU GDPR Representative, The DPO Centre Europe Limited, Alexandra House, 3 Ballsbridge Park, Dublin, D04C 7H2, Ireland.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)), the relevant Supervisory Authority in the EU/EEA member state where you reside, or the applicable regulator in your jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach the Supervisory Authority so please contact us in the first instance.