

OncoSHARE Privacy Policy

THIS ONCOSHARE PRIVACY POLICY (THE “PRIVACY POLICY”) APPLIES WHENEVER YOU MAKE USE OF THE ONCOSHARE PLATFORM (“ONCOSHARE”) AND THE RELATED SERVICES (THE “SERVICE”), AND DESCRIBES HOW ONCODNA (AS DEFINED BELOW IN ARTICLE 1) COLLECTS, PROTECTS, USES AND SHARES PERSONAL DATA (AS DEFINED BELOW IN ARTICLE 2) GATHERED THROUGH THE USE OF THE SERVICE AND YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA.

OncoDNA respects your privacy and how you may choose to provide data. OncoDNA recognizes the need for appropriate protections and management of the Personal Data collected. OncoDNA conducts its business pursuant to this Privacy Policy to assist you in understanding what types of Personal Data OncoDNA may collect, how that Personal Data may be used, and with whom Personal Data may be shared.

OncoDNA processes your Personal Data in compliance with this Privacy Policy (available at <http://www.oncoshare.com/legaldocs/oncoshare-privacypolicy.pdf>) and the OncoSHARE General Terms and Conditions (the “GTCs”) <http://www.oncoshare.com/legaldocs/oncoshare-generalterms.pdf>, both accessible on the OncoSHARE website available at www.oncoshare.com (the “Website”). To use OncoSHARE, you must first accept this Privacy Policy and the GTCs. By doing so, you consent to the application of this Privacy Policy and you authorize OncoDNA to process your Personal Data in accordance with and for the purposes defined therein. You may revoke your consent in writing at any time. Upon receipt of the written revocation, OncoDNA will (i) stop using or disclosing your Personal Data, except to the extent that OncoDNA has already taken action in reliance on the consent, and (ii) stop providing the Service, without prejudice to payment obligations as the case may be.

You are strongly invited to carefully read this Privacy Policy in order to fully understand OncoDNA’s processing of your Personal Data and as well as your rights with respect to such processing. OncoDNA expressly reserves the right to modify this Privacy Policy. You hereby undertake to review periodically the Privacy Policy as published and accessible on the Website. OncoDNA will take your legitimate interests into consideration when amending the Privacy Policy.

1. Data Controller

The legal entity responsible for the processing of your Personal Data is OncoDNA SA, a Belgian limited liability company, having its registered offices at Rue Louis Breguet 1, 6041 Charleroi, Belgium, registered with the Crossroads bank for enterprises under company number 0501.631.837, and referred to in this Privacy Policy as “OncoDNA”. This Privacy Policy sets out the conditions under which OncoDNA may process your Personal Data, with your consent where necessary.

OncoDNA is the data controller under the Data Protection Legislation (as defined below in Article 2).2).

2. Categories of Personal Data Processed

In the framework of this Privacy Policy, “**Personal Data**” means any personal data as defined in Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (i.e. any information relating to an identified or identifiable individual), or any modifying European regulation (including the General Data Protection Legislation), as well as the applicable national implementing or additional legislation (collectively the “**Data Protection Legislation**”).

Furthermore, for the purpose of this Privacy Policy, the terms “**Patient**”, “**Medical Doctor**”, “**Official Distributor**” and “**Interested Third Party**” shall have the meanings provided under the GTCs.

OncoDNA collects your Personal Data in the framework of the provision of the Service. The Personal Data collected and processed by OncoDNA for each category of users encompass the following information:

2.1. **If you are a Patient:**

- 2.1.1. Personal Data relating to you as provided by you or generated by OncoDNA during the registration procedure to OncoSHARE or the Service and the creation of your user-account or when updating the latter (“**Account Data**”): first and last names, username, interface language (optional), title (optional), gender (optional), email address, postal address (optional), birthdate (optional), patient unique number, password, access rights and log files;
- 2.1.2. Personal Data relating to your health (“**Health Data**”):
 - Diagnosis, cancer stage, primary site, diagnosis date, current site of metastases, collection date, previous systemic therapies, current therapy, relevant comorbidities, concomitant medications, biomarkers already tested, indication of possible change of Medical Doctor treatment decision on the basis of the Report, list of drugs given, indication of possible reaction to the treatment, as well as any other relevant information with respect to (the treatment of) the Patient’s condition;
 - “**Report**”: the OncoDEEP theranostic report containing personalized treatment options, taking into account the Patient’s tumor’s molecular characteristics (using tumor tissue) and/or the OncoTRACE cancer monitoring report of biomarkers specific to each Patient’s tumor, giving to the Medical Doctor indicators of its Patient’s response to ongoing treatment (using blood samples) as further defined in the GTCs.
- 2.1.3. “**Results**”: sequencing raw files and sequencing data resulting from the OncoDEEP, OncoTRACE or OncoSTRAT&GO analysis, ordered by your Medical Doctor and performed on your tumor tissue and/or blood sample(s);
- 2.1.4. Personal Data related to your use of the OncoSHARE chat/forum: messages posted/sent, date and time of messages posted/sent;
- 2.1.5. Identification and contact information related to your Medical Doctor.

2.2. If you are a Medical Doctor:

- 2.2.1. **“Account Data”:** first and last names, username, interface language (optional), title (optional), gender (optional), professional telephone number, email and postal addresses, function, practice institution name, oncology speciality(ies), password, access rights and log files.
- 2.2.2. Patients list limited to Patients with respect to whom the Medical Doctor orders OncoDEEP, OncoTRACE or OncoSTRAT&GO analysis via OncoSHARE or otherwise uses the Service;
- 2.2.3. Information relating to the consulted and/or shared Reports;
- 2.2.4. Answers provided by the Medical Doctor to OncoDNA follow-up questions.

2.3. If you are an Official Distributor: “Account Data”: Official Distributor’s contact person’s first and last names, professional email address and telephone number, the company to which he/she belongs (as the case may be), login, password, access rights and log files.

2.4. If you are an Interested Third Party:

- 2.4.1. **“Account Data”:** first and last names, username, email address, password, access rights and log files;
- 2.4.2. Personal Data related to your use of the OncoSHARE chat/forum: messages posted/sent, date and time of messages posted/sent.

In addition to the above-listed categories of Personal Data, OncoDNA collects the following information related to your use of the Service (**“Service Data”**), irrespective of your user category: data on when you use the Service and for how long, information related to your operating system and type of device.

3. Purposes of processing of Personal Data

OncoDNA collects, processes and uses Personal Data relating to you solely for the purposes indicated in this Privacy Policy. The main purposes for which OncoDNA processes your Personal Data are to make OncoSHARE available, perform the Service - as available for each category of users (i.e. the Patients, Medical Doctors, Official Distributors and Interested Third Parties) - and manage the contractual relationship between you and OncoDNA. This includes creating and managing your user-account, processing the orders, generating and communicating the Reports, collecting payments, contacting the users and answering their queries. In addition, OncoDNA may process your Personal Data, including Account Data, for monitoring the use of the Service, analyzing the habits of the users, and designing additions or new functionalities enhancing the Service. To the greatest extent possible, OncoDNA shall process pseudonymized or anonymized data, rather than Personal Data, when the purposes of such processing can be achieved in the same way.

Without limiting the generality of the foregoing, in order to generate the Reports, OncoSHARE gathers data collected and stored into OncoSHARE’s supporting database OncoLIMS, including Patients’ anonymized Health Data. The Reports do

not contain data that directly identify the Patient. Only the Medical Doctor requesting the Service with respect to his/her Patient as well as the biologists and scientific support team of OncoDNA can link the generated Report(s) to (a) specific Patient(s).

In addition, OncoDNA may participate to research studies and clinical trials. In such context, OncoDNA may process and disclose Patient's Personal Data - including Health Data and Results - to accredited research centers/institutes and competent authorities for biomedical researches purposes. However, OncoDNA shall in no event proceed to such processing and/or disclosure without first obtaining the Patient's written informed consent with respect thereto, such consent being revocable at any time.

In addition, OncoDNA may process the Medical Doctors' and Official Distributors' Personal Data for direct marketing purposes, in compliance with the Data Protection Legislation. You may object to the processing of your Personal Data as specified in Article 10.

Finally, OncoDNA may use your Personal Data for new purposes which are as yet unforeseen in this Privacy Policy, either on the basis of an applicable statutory permission or obligation or subject to your consent. In any event, prior to using your Personal Data for other purposes, OncoDNA will inform you about the changes to this Privacy Policy and, in case of consent-based activities, OncoDNA will offer you the possibility to decline participation in these changes.

4. Sensitive Personal Data

When consenting to an OncoDEEP, OncoTRACE or OncoSTRAT&GO analysis by signing or otherwise consenting to the Informed Consent Form (as defined in the GTCs) that the Medical Doctor submits to the Patient, the Patient consents to the processing by OncoDNA of his/her Health Data as well as of the Results. The performance of an OncoDEEP, OncoTRACE or OncoSTRAT&GO analysis is usually (i) subcontracted to OncoDNA's subcontractor, BIO.be SA ("BIO") - or any other selected subcontractor - and (ii) executed on behalf of BIO by BIO's mother company, the Institute of Pathology and Genetics ASBL ("IPG").

By signing or otherwise consenting to the Informed Consent Form, the Patient agrees to the processing by OncoDNA of the Patient's Health Data, without the supervision of a health professional, for the purpose of performing the OncoDEEP, OncoTRACE or OncoSTRAT&GO analysis as the case may be, generating the Reports and, more generally, providing the Service to the Medical Doctor and the Patient.

5. Transfer of Personal Data

In the framework of the provision of the Service and your use thereof, OncoDNA may transfer certain of your Personal Data as described below in this Article 5.

5.1. Patient's Personal Data

5.1.1. *Transfer of Health Data*

- The tumor tissue and/or blood samples are provided to BIO - or any other selected subcontractor - and IPG in a pseudonymized manner, preventing BIO and IPG from linking the samples provided to them to identified Patients: when Patients' tumor tissue and/or blood samples are sent to BIO - or any other selected subcontractor - and IPG, such samples are labelled with a unique identifier, without disclosing the identity of the Patients. Each identifier is linked to a specific Patient. Only the Medical Doctor as well as the biologists and the scientific support team of OncoDNA possess the necessary information to link an identifier to its corresponding Patient.
- The Patient's Reports are transferred to the Medical Doctor in the framework of the treatment of the Patient.
- As part of the Service available to the Medical Doctor, the latter may choose to disclose or share, through OncoSHARE, any generated Report in relation to his/her Patients, to (i) the relevant Patient and/or (ii) specialized oncologists collaborating with OncoDNA (the "**Expert Advisors**"), for advising purposes or in case the Medical Doctor has peculiar questions pertaining to such Expert Advisors' specialties with respect to a Patient's condition. In addition, the Medical Doctor may disclose anonymized Reports to other Medical Doctors registered with OncoSHARE, to discuss and exchange medical expertise/opinion about a specific case.
- When the Medical Doctor deems it necessary and solely when the Medical Doctor decides so, specific Reports may be disclosed to the Official Distributor via which the Medical Doctor ordered the Service.
- As explained in Article 3, OncoDNA may participate to research studies and clinical trials. In such context, OncoDNA may process and disclose Patient's Personal Data - including Health Data and Results - to accredited research centers/institutes and competent authorities for biomedical researches purposes. However, in no event OncoDNA shall proceed to such processing and/or disclosure without first obtaining the Patient written informed consent with respect thereto, such consent being revocable at any time.

5.1.2. Transfer of other Patient's Personal Data

In the framework of OncoDNA commercial relationships with Official Distributors, OncoDNA may communicate certain of the Patients' Account Data, in compliance with the Data Protection Legislation, to an Official Distributor with respect to Patients within the distribution zone(s) allocated to such Official Distributor, pursuant to the distribution agreements entered into between OncoDNA and the Official Distributor, in order to enable such Official Distributor to contact the Patients with respect to OncoDNA Service likely to be of interest to the Patients.

5.2. Medical Doctor's Personal Data

5.2.1. In the framework of OncoDNA commercial relationships with Official Distributors, OncoDNA may communicate certain of the Medical Doctor's Account Data, in compliance with the Data Protection Legislation, to an Official Distributor with respect to Medical Doctors located within the distribution zone(s) allocated to such Official Distributor, pursuant to the distribution agreements entered into between OncoDNA and the Official

Distributor, in order to enable such Official Distributor to contact the Medical Doctors with respect to OncoDNA Service likely to be of interest to the Medical Doctors.

5.2.2. In the event that the Medical Doctor orders OncoDEEP, OncoTRACE or OncoSTRAT&GO analysis or otherwise calls upon the Service through the intermediary of an Official Distributor, the Medical Doctor and/or OncoDNA may disclose such Medical Doctor's relevant Patients list to the Official Distributor for the purpose of processing the Medical Doctor's order(s).

5.3. Interested Third Party's Personal Data

In the framework of OncoDNA commercial relationships with Official Distributors, OncoDNA may communicate certain Interested Third Party's Account Data, in compliance with the Data Protection Legislation, to an Official Distributor for the purpose of contacting the Interested Third Party, if such Interested Third Party is located within the distribution zone(s) allocated to such Official Distributor pursuant to the distribution agreement entered into between OncoDNA and the Official Distributor.

5.4. General

To provide you with the Service and operate OncoSHARE, OncoDNA may call upon the services of subcontractors to whom certain Personal Data related to you may be communicated and with respect to which OncoDNA has taken appropriate measures to ensure the protection of your Personal Data, in accordance with the Data Protection Legislation. For Example, OncoDNA makes use of services of subcontractors to collect payment.

Generally, OncoDNA will not transfer your Personal Data to third parties, except the transfers (i) authorized or required under applicable law or (ii) as mentioned in this Article 5 or elsewhere in this Privacy Policy. You also consent to the transfer of your Personal Data in the event OncoDNA sells or transfers all or a portion of its business or assets to a third party.

To the extent that this involves the transfer of Personal Data to countries outside of the European Economic Area in countries not considered by the European Commission as ensuring an adequate level of personal data protection, OncoDNA shall ensure that measures are put in place in accordance with the Personal Data Legislation.

6. Personal Data retention period

OncoDNA will retain your Personal Data, collected and processed by OncoDNA in accordance with this Privacy Policy, for the duration of your use of the Service except when specified otherwise in this Privacy Policy. If you do no longer wish to use the Service, you merely have to unsubscribe by sending an email at support@oncoshare.com. OncoDNA will then deactivate your user-account and delete your Personal Data within twelve (12) months following the deactivation, unless OncoDNA has a specific legitimate interest in storing your Personal Data for a longer period (e.g. to the extent the data is required to clarify an alleged

infringement of third party rights or to comply with a legal or regulatory obligation).

7. Security and confidentiality of Personal Data

OncoDNA has put in place the required security measures in order to protect the Personal Data processed in the framework of the Service against accidental or unauthorized destruction, loss as well as illicit or unauthorized modification, use, access and other processing. OncoDNA takes steps to maintain the confidentiality of your Personal Data and protect it from unlawful disclosure.

8. Cookies

OncoDNA uses so-called “cookies” to fashion the Service and the Website in a more user-friendly way. Cookies are pieces of data (small electronic text files) stored on the electronic device/terminal equipment of the user that contain data about a user or its device. They allow the storage of information for a determined period of time and the identification of the user’s electronic device.

As part of the Service, cookies may be placed on your computer, mobile phone or other electronic device to collect both anonymous data and Personal Data about you as specified in this Privacy Policy.

When you visit the Website for the first time, the entry page will show information on privacy and respective wording regarding the consent to the use of cookies through a “cookie banner”. If you continue to actively use the Website and do not actively object to the use of cookies, you agree to our use of cookies and such consent will be stored in your browser, so that the information does not have to be repeated on every page of the Website. Should the consent be missing in your browser, the “cookie banner” with privacy information will appear again the next time you visit the Website.

In order to provide the Service, OncoDNA installs and uses certain technically required cookies which therefore do not require your prior consent. OncoDNA also uses session cookies which are automatically deleted at the end of your session and which also do not require your prior consent. Other cookies (such as cookies to improve the navigational experience by keeping record of certain data - this avoids you having to reintroduce such data at each connection - and by tailoring the content of the Service to your preferences) may be installed and used on the basis of your consent. You may, at any time, delete or block cookies in your browser parameters. However, in such case some functionalities of the Service or Website requiring the use of cookies for technical purposes may be reduced or may no longer be available to you.

OncoDNA uses analytics cookies to gather general information on how users use the Service and the Website, e.g. which pages they visit most frequently and whether they receive any error messages from websites. These cookies do not collect any data that may lead to an identification of the user. All information collected with the aid of such cookies exclusively serve the purpose of improving the functionality of the Service and Website. OncoDNA uses Google Analytics, a

web analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”). The information regarding your usage of the Service and Website generated by the use of Google Analytics is usually transmitted to and stored on a Google server in the US. However, the code "gat._anonymizeIp();" has been added to Google Analytics on the Website to ensure anonymous recording of IP addresses, known as "IP masking". Google IP anonymization on this website truncates your IP address within the European Union and European Economic Area territories. Only in exceptional cases will the full IP address be sent to a Google server in the US and truncated there. Google will use this information on OncoDNA’s behalf to analyze your use of the Website, compile reports on Website activity and provide other website and internet usage-related services for the website operator. The IP address transmitted by your browser as part of Google Analytics is not merged with other Google data. You can prevent recorded data generated by the cookie concerning your use of the Website (including Your IP address) from being sent to Google and prevent the processing of this data by Google by downloading and installing the browser plugin available via the link <https://tools.google.com/dlpage/gaoptout>. Additional information on the Terms of Use and Data Privacy Policy of Google Analytics may be found at <https://www.google.com/analytics/terms/> and <https://www.google.com/policies/privacy/partners/>.

OncoDNA uses the following Google Analytics Advertising Features: Google Analytics Demographics and Interest Reporting; Integrated services that require Google Analytics to collect data via advertising cookies and anonymous identifiers.

The tables below list the first-party and third-party cookies used by OncoDNA respectively on OncoSHARE and the Website (www.oncoshare.com):

Owner	Name	Description	Validity
OncoDNA	cookieconsent_dismissed	Functional cookie. Indicates that the user agreed to have cookies.	1 year
Symfony	ONCOSHARE	[to be completed]	Session
Zopim	__zcmid	This cookie is used to distinguish users.	1 year
Google Analytics	_ga	This cookie is used to distinguish users.	2 years
Google Analytics	_gat_UA-79686139-2	The plugin works by sending an additional request to stats.g.doubleclick.net that is used to provide advertising features like remarketing and demographics and interest reporting in Google Analytics. The plugin also creates a new cookie named _gat that has a ten minute timeout. This cookie does not store any user information, it is just used to limit the number of requests that have to be made to doubleclick.net.	10 minutes
Hotjar	_hjIncludedInSample	This session cookie is set to let Hotjar know whether that visitor is included in the sample which is used to generate funnels.	Session
Hotjar	_hjMinimizedPolls	This cookie is set once a visitor minimizes a Feedback Poll widget. It is used to ensure that the widget stays minimized when the visitor navigates through the Website.	1 year

Symfony	hl	This cookie is used to track the user interface language.	1 year
OncoDNA	os_login_position	This cookie is used to track the user position.	Session
Intercom	intercom-id-k452cgy6	This cookie is used to distinguish users. It allows OncoDNA to provide efficient and contextual customer support.	20 years

9. Social plugins

Medical Doctors and Patients may choose to create their user-account via their Facebook, LinkedIn or Twitter account. OncoDNA will then receive data from such public Facebook, LinkedIn or Twitter profile by single data flow. However, OncoDNA will only collect the first and last names and email address as these Personal Data appear on the applicable public Facebook, LinkedIn or Twitter profile, any other data being excluded.

For Your information, (i) the facebook.com website is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland is responsible for the Belgian website facebook.be; (ii) the linkedin.com website is operated by LinkedIn Corporation, 1000 West Maude Avenue, Sunnyvale CA 94085, USA. If you reside outside of the USA, the responsible entity is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland; and (iii) the twitter.com website is operated by Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103. For users located outside the USA, the data controller responsible is Twitter International Company, with registered offices at The Academy, 42 Pearse Street, Dublin 2, Ireland.

10. Your Rights

You have the right to access to your Personal Data, as collected and processed by OncoDNA, and to request their rectification or suppression (as the case may be) in the event that they would be inaccurate or unnecessary. In order to exercise your rights, you only have to send a written and signed request to OncoDNA at the email address support@oncoshare.com or at the postal address of OncoDNA SA (Rue Louis Breguet 1, 6041 Charleroi, Belgium), together with a copy of your ID card or other identification document, as well as any document proving that you are the data subject of the Personal Data.

You may object to the processing of your Personal Data for direct marketing purposes, as the case may be, at any time, free of charge and without having to provide a justification by following the abovementioned procedure.

Finally, with respect to Reports, access to those will solely be granted to the relevant Patient at the discretion of his/her Medical Doctor (such access being, in some cases, mandatory under applicable law).