

## **PRIVACY NOTICE**

XenTech is committed to protecting and respecting your privacy.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonize data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organizations can legally operate.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time the data controller is XenTech 4 rue Pierre Fontaine, 91000 Evry, France.

Our nominated Data Protection Officer is Pascal Leuraud, COO.

### **Who we are and what we do**

XenTech is a CRO developing a pre-clinical platform for translational research in oncology. Our platform is based on a large panel of patient-derived tumor xenografts (PDX) models. XenTech has its own R&D programs and makes its platform available to Pharmaceutical Companies and Academic Institutions through service and research collaborations.

We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and live client contacts;
- Supplier contacts to support our services;

We collect information about you to carry out our core business and ancillary activities.

### **Information you give to us or we collect about you.**

This is information about you that you give us by filling in forms on our website (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register, enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey.

The information you give us or we collect about you is restricted to your name, corporate address, corporate e-mail address, corporate phone number, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

### **Information we collect about you when you visit our website.**

With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

### **Information we obtain from other sources**

This is information we obtain about you from other sources such as professional networking websites, corporate websites, your business card or personal recommendations, and others.

We are working closely with third parties including business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies and professional advisors. We may receive information about you from them for the purposes of sending information about our services.

### **Purposes of the processing and the legal basis for the processing**

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your organization.
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.

The core service we offer to our clients is the evaluation of antitumor efficacy of candidate drugs. However, our service expands to supporting you with new offers that can respond to specific questions on a tailor made basis (discover predictive biomarker in support of subsequent companion diagnostic development - Cell lines derived from our PDX are available for in vitro assays - An Immuno-Oncology PDX range (syngeneic and PBMC humanized models) is available to test I/O checkpoints and combinations with existing or emerging therapies).

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating a service agreement with your organization or any other contract to provide services to you or receive services from you or your organization.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required.

### **Our Legitimate Business Interests**

Our legitimate interests in collecting and retaining your personal data is described below:

- As a service provider we are willing to offer the right services to the right project. The identification of the right contact person within your organization is a fundamental, essential part of this process.
- In order to support our clients' services needs we require a database of client personal data containing historical information as well as current services requirements.
- To maintain, expand and develop our business we need to record the personal data of client contacts.

### **Consent**

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

### **Other uses we will make of your data:**

- use of our website;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

### **We will use this information:**

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process.

### **Disclosure of your information inside and outside of the EEA**

We may have to share your personal information with selected third parties both in the EEA and outside of the EEA, including:

- suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- subcontractors including email marketing specialists, event organizers, payment and other financial service providers;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimization of our site;

We will disclose your personal information to third parties:

- If XenTech or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of XenTech, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.

### **Where we store and process your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the

European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the

purpose of our services. It may also be processed by staff operating outside the EEA who works for us or for one of our suppliers. This includes staff engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

### **Retention of your data**

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so.

We do the following to try to ensure our data is accurate:

- we keep in touch with you so you can let us know of changes to your personal data

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymize parts of your data, particularly following a request for suppression or

deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymized Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

### **Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [privacy@xentech.eu](mailto:privacy@xentech.eu)

Our site may, from time to time, contain links to and from the websites of our partner networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.