# Information about Oxcias processing of personal data

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#### **Data protection officer:**

**Emil Lindmark** 

If you have any questions, requests, or complaints regarding how we process your personal information, please contact us at privacy@oxcia.com

### ONCIA

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#### 1. General about processing of personal data

#### 1.1 Background and purpose

This privacy policy explains why and what personal information Oxcia AB (publ.) ("Oxcia") may collect and process when visiting Oxcias website or if an e-mail is sent to one of Oxcia's e-mail addresses or otherwise have personal data processed by Oxcia. This policy contains a description of data subjects rights regarding protection of data and privacy. Also, what, why and for how long we process your personal data.

Please read this privacy policy carefully and feel free to contact us if you have any questions.

#### 1.2 Personal data

Oxcia may collect personal data, which means any information relating to an identified or identifiable natural person. An identifiable natural person is a person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data or online identifiers or one or more factors specific to the physical, physiological, genetic, economic, cultural, or social identity of that natural person.

#### 1.3 Who is responsible for processing personal data

Oxcia is the controller of the personal data processed in all the specific categories listed below.

#### 1.4 Who has access to your personal data

Personal data will be processed by Oxcia. Information is shared within Oxcia on a need-to-know basis.

Personnel that access personal data needs the information to perform their jobs. Personal data will be shared with IT-providers that process personal data on our behalf, so called processors. For example, cloud service providers may get access to your personal data. We have entered into data processing agreements with our processors requiring them to process personal data in a safe, accurate and confidential manner.

Personal data might also be provided to authorities if a disclosure is required by law. In the case of employees and contractors of Oxcias suppliers, personal data might be shared with banks and debt collectors. Authorities, banks, and debt collectors are in this instance controllers for the processing of your personal data.

#### 1.4 Links to other websites

Oxcias website (www.oxcia.com) contains links to several websites that we believe may have useful information for those who visit our website. This Privacy Policy and the obligations under it do not apply to such websites (unless the other website is owned by Oxcia and links to this policy). We suggest that you contact these websites directly for information about their privacy, security, data, and collection policies. Oxcia cannot be held responsible for the actions of such third-party websites or for the content they provide.



#### 2. Specific categories of personal data we process

#### 2.1 Visit to our website and cookies

We do not process any personal information when visiting this website. We only use strictly necessary cookies, please read more about Oxcias use of cookies at https://Oxcia.com/information-about-cookies.

#### 2.2 Personal data connected to e-mails

#### 2.2.1 What personal data we process when handling e-mails

We process name, e-mail, place of work and other contact information that is displayed in e-mails. This personal data is collected in connection with e-mail communications with Oxcia officials.

#### 2.2.2 Why we process personal data in e-mails

We process personal data to communicate with people for various business or scientific purposes in accordance with Oxcias long term vision to become a global Swedish-based pharmaceutical company.

Initially an email is processed based on balance of interests and Oxcias legitimate interest to read received emails. Depending on the content of the e-mail the personal data is processed because of:

- -Basis of balance and Oxcias legitimate interest to maintain or evaluate a business relationship,
- -Processing is necessary to fulfil a contract or to take steps at the request of the data subject prior to entering a contract, or
- Processing is necessary to fulfil a legal obligation.

#### 2.2.3 How long we process and store personal data

Personal data is only processed until it is no longer necessary in relation to the purposes for which they were collected or otherwise processed unless it must be stored because of a legal obligation. Oxcia has an internal guideline regarding the storage of personal data.

# 2.3 Personal data processed in connection with application for employment

# 2.3.1 What personal data we process in connection with application for employment

We process the personal data provided to us in applications. Such data includes name, personal identification number, address, phone number, e-mail address, image (if any), education, education grades, work testimonial, professional experience and other information that is provided.



### 2.3.2 Why we process personal data when receiving applications for job opportunities

Oxcia base the processing on two legal grounds, carrying out our obligations and exercising our rights in the field of employment and a balance of interests (Oxcia have balanced its interest of using the information against interest of privacy).

For the following purposes Oxcia process personal data to carry out obligations and exercising our rights in the field of employment: If we were to become subject to claim according to the Swedish Discrimination Act, we process personal data to exercise and protect our legal rights.

For the following purposes, Oxcia process personal data based on a balance of interests: To assess and consider different candidates based on experience, qualifications, and academic performance; To administrate invitations and bookings to interviews; To collect and review resume and personal letter. Oxcia assess that it has a legitimate interest to process personal data for Oxcia to be able to recruit new personnel.

#### 2.3.3 How long we process and store personal data

To the extent that Oxcias processing is based on a balance of interests, we do not process personal data after the recruitment process is over. We need to process your personal data after you have participated in a recruitment process to protect our rights under the Swedish Discrimination Act. We therefore save the information in the application documents for two (2) years after the application process is over. Oxcia has an internal guideline regarding the storage of personal data.

# 2.4 Personal data relating to employees and contractors of Oxcias suppliers

# 2.4.1 What personal data we process in relation to employees and contractors of our suppliers

Oxcia collect personal data such as, name, phone number and e-mail from the employer, or when applicable, contractor, in connection with the business relationship between Oxcia and the employer or contractor or which has been provided to Oxcia within the context of the business relationship.

# 2.4.2 Why we process personal data of employees and contractors of our suppliers

If Oxcia is provided with personal data from a sole trader Oxcia process the personal data necessary to fulfil the agreement or to take necessary steps that has been requested before entering into an agreement. Oxcia also process personal data to administrate the contract, to communicate as well as to order and use the company's services. Providing personal data is not a legal or contractual requirement. Sole trader is not obligated to provide personal data. If a sole trader does not provide us with its personal data, we will not be able to enter an agreement and thereafter fulfil the agreement and administrate the contractual relationship with the sole trader.



Personal data as an employee or contractor of a supplier to Oxcia is processed in accordance with the agreement with the supplier for the purposes of invoice- and payment administration, deliveries, to enable communication between the parties as well as other administration needed within the contractual relationship. Oxcia process personal data based on a balance of interests. Oxcias legitimate interest is to be able to administrate the contract and to fulfil obligations towards suppliers (the employer or contractor). If applicable, Oxcia process personal data about employee or contractor of supplier for accounting purposes such as billing or payment of services or products. This processing is based on a legal obligation according to the Swedish Accounting Act.

# 2.4.3 How long we process personal data of employees and contractors of our suppliers

Oxcia process personal data of employee or contractor of our suppliers for as long it is necessary for Oxcia to administrate the contractual relationship, exercise rights and fulfil commitments towards the supplier. If employment or contract is terminated with the supplier or in relation to Oxcia, we will cease to process the personal data as soon as Oxcia have received such information from the supplier. Any information relating to payment where processing is required according to the Swedish Accounting Act is processed for seven (7) years in accordance with the Swedish Accounting Act. Inactive agreements containing personal data are stored for a ten (10) year due to the period of limitation according to the Swedish statute of limitation. Oxcia has an internal guideline regarding the storage of personal data.

#### 3. Data subject's rights

We take reasonable steps to protect your personal information from unauthorized use and access, disclosure, alteration, or destruction by using technical and organizational measures that meet industry standards. However, no transfer over the internet can be guaranteed to be completely secure. Therefore, to the extent permitted by applicable law, we make no warranties, express or implied, regarding the security or integrity of personal data.

You have the right at any time to access your personal information and object to the processing as well as to have it corrected, deleted, or transferred to other controller at your request. You also have the right to object to or restrict certain processing and to withdraw your consent at any time in cases where we have asked for your consent to process your personal information. If you withdraw your consent, we will stop any future use of your personal information if there is not a legal obligation to keep processing your personal data.

You also have the right to complain regarding Oxcias processing of your personal data, you have the right to send a complaint to the Swedish Data Protection Authority <a href="https://www.integrationsmyndigheten.se">www.integrationsmyndigheten.se</a>

#### 4. Third countries and transfer of data

Oxcia strives to process personal data within the EU/EEA. If personal data must be processed outside the EU/EEA Oxcia uses standard contractual clauses that the European Commission has decided on or only transfers personal data to nations that the EU deems has an adequate level of protection.