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## **Privacy Policy**

Oasmia Pharmaceutical AB



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## 1 Background

*Oasmia Pharmaceutical AB ("Oasmia") develops, manufactures, markets and sells new generations of drugs in the field of human and veterinary oncology. The company's product development aims to create and manufacture novel nanoparticle formulations and drug-delivery systems based on well-established cytostatics which, in comparison with current alternatives, show improved properties, reduced side-effects, and expanded applications.*

Oasmia treats various personal data. It is essential that all such treatment is performed correctly, which does not endanger the personal integrity of the person whose personal data is processed ("**Registered** or **Data Subject**"). Oasmia shall in all cases ensure that personal data is processed in a lawful and correct manner, and that all personnel and data processors who process personal data on behalf of Oasmias have the qualifications and knowledge required for processing such information.

This Privacy Policy ("**Policy**") contains rules and guidelines for the processing of personal data by Oasmia as a personal data controller and data processor, regardless of the type of personal data in question and whose personal data it concerns. The purpose of the policy is to increase knowledge in Oasmia regarding the content of Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 ("General Data Protection Regulation") and to ensure that Oasmia fulfills its obligations under the General Data Protection Regulation.

## 2 Personal data processed, purpose and period of storage.

### 2.1 General

Oasmia collects and processes a variety of personal data through the means described below. In many cases, when we request personal data, we do so to comply with statutory or contractual requirements or requirements that are necessary for entering into an agreement with, for example, an employee, a customer or a supplier. When the registered does not provide the information we request, in some cases, we may not conclude an agreement or fulfill our obligations in an agreement with the data subject. Below are the areas in which Oasmia deals with personal data. In addition to the respective area, the purposes and legal basis for the treatment, those who receive the data and the storage period, etc. are also stated.

### 2.2 Consultants

*What is the legal basis for the treatment?*

To fulfill legal obligations or to be able to conclude and comply with consultancy agreements, Oasmia may need to obtain the personal data of individual consultants.

*What personal data is processed and who is the recipient?*

Personal data processed by Oasmia are name, social security number, address, e-mail address, telephone number, bank details, qualifications, basis for calculation of fees, experience, etc. and contact details of the head of the individual consultant.



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Those who receive the information are mainly relevant managers, HR manager, any external actors who administer payments of fees, etc., and authorities, when required, and others.

*For what purposes is personal data processed?*

The personal data of the consultant may be required for the following purposes: payment of consultancy fees and other remuneration, general administration of consultancy services, maintenance of contingency and disaster planning, maintenance of control systems, decision making on the suitability of certain services and assignments, enabling evaluation and review of performance and to ensure compliance with legal obligations.

*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed. Generally, personal data will not be retained after the consultancy assignment has been completed. However, it may be necessary for Oasmia to save the data for a long period after termination to fulfill legal obligations regarding taxation, accounting legislation or to address legal requirements that may be directed towards Oasmia. In these exceptional cases, the storage period is a maximum of 10 years from the end of the consultancy assignment.

## **2.4 Recruitment**

*What is the legal basis for the treatment?*

To handle applications that the registered have filed, interview and make decisions in a recruitment process, Oasmia must process certain personal data.

*What personal data is processed and who is the recipient?*

Personal data processed by Oasmia includes name, date of birth, address, information about experience and skills, possibly photography etc. In such cases, automated decision making, including profiling, may occur.

Those who receive the information are mainly HR managers, concerned department managers and possibly recruitment firms. If external parties maintain the recruitment, personal data processor agreements are established with the external contractor.

*For what purposes is personal data processed?*

In order for Oasmia to handle applications, interviews and decision making in a recruitment procedure, we collect and process personal data.

*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed. However, Oasmia may need to store personal data after the recruitment process has been



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completed if we consider it necessary to save the personal data to handle legal claims that may be directed towards Oasmia. The storage period is therefore 2 years.

## 2.5 Customers

*What is the legal basis for the treatment?*

To be able to enter into and manage agreements with our customers, Oasmia treats personal data of representatives of our customers. Some personal data may be treated due to Oasmias legal obligation to do so, for example, personal data on invoices.

*What personal data is processed and who is the recipient?*

We treat personal data of representatives of companies we have customer agreements with. Personal data processed may include name, phone number, e-mail address, etc.

Those who receive the information are the Business Development department, Logistics Department, Finance Department and concerned managers.

*For what purposes is personal data treated?*

Oasmia treats personal data relevant to the relationship with the customer and required for the performance of the agreement. Personal data such as representative name, e-mail and phone number are processed to enable dialogue with the customer and, in general, to manage the agreement.

*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed after the customer relationship has ceased.

However, Oasmia may need to store personal data after the relationship has ceased to administer any warranties and deadlines, handle legal claims that may be directed towards Oasmia. Personal data may also need to be stored to ensure compliance with legal obligations, such as accounting legislation. If such obligations exist, personal data can be stored for up to 10 years.

## 2.6 Suppliers

*What is the legal basis for the treatment?*

To be able to conclude and manage agreements with suppliers, Oasmia deals with personal data of representatives of the suppliers. Some personal data may also be treated because of Oasmias legal obligation to do so, such as personal data on invoices.



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*What personal data is processed and who is the recipient?*

We process personal data of representatives of supplier companies that we have or intend to enter into an agreement with. Personal data processed may include name, phone number, e-mail address, address and title.

Those who receive the information are mainly Logistics Department, concerned managers, CEO and Finance Department.

*For what purposes is personal data processed?*

Oasmia treats personal data to generally manage contracts, handle invoices and to enable dialogue with the customer and, in general, to manage the agreement.

*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed after the contractual relationship has ceased.

However, Oasmia may need to store personal data after the termination of the contract, to administrate any warranties and deadlines, handle legal claims that may be directed towards Oasmia. Personal data is therefore stored for 2 years from the date of termination of the contract.

Personal data may also need to be stored generally to ensure compliance with legal obligations, such as accounting legislation. If such obligations exist, personal data must be stored for up to 10 years.

## **2.7 Insiders**

*What is the legal basis for treatment?*

To fulfill legal obligations in accordance with the Market Abuse Regulation (" **MAR**"), Oasmia must keep a list of the permanent insiders and insiders of specific occasions.

*What personal data is processed and who is the recipient?*

The personal data processed by Oasmia include, name, phone number, social security number, address and information of closely associated persons.

Those who receive the information are the Business Development and/or Legal Affairs Department.

Upon request, Oasmia is obliged to send the insider list to Swedish Financial Supervisory Authority. In case of such event, the registrant will be informed that personal data has been transferred to a third party.

*For what purposes is personal data processed?*

Oasmia deals with personal data to comply with its legal obligation to keep an insider list under the regulations of MAR.



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*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed. Insider lists must by law be kept for at least five years from the date on which it was established or 5 years from the date it was updated.

## **2.8 Shareholders**

*What is the legal basis for treatment?*

To fulfill legal obligations in accordance with the Swedish Companies Act, Oasmia has an obligation to store stock registers. Oasmia maintains an accurate and complete stock register since it is critical to ensure that the company has accurate information available at all times about its stock and stock holders.

*What personal data is processed and who is the recipient?*

Personal data processed by Oasmia includes name, social security number, address, number of shares and voting rights.

Those who receive it are mainly Business Development - and the Legal Affairs Department.

*For what purposes is personal data processed?*

Oasmia treats personal data to fulfill its legal obligation under the Swedish Companies Act, Chapter 5.

*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed. However, Oasmia needs to keep stock registers by law for as long as the company is in existence and for at least 10 years after the company's resolution.

## **2.9 Clinical trials**

*What is the legal basis for treatment?*

Oasmia treats the personal data to comply with contractual obligations according to ICH GCP (good clinical practice) quality system. The registered voluntarily agrees to the processing of personal data relating to clinical trials and has the right to at any given time withdraw their consent and have their personal data deleted.

*What personal data is processed and who is the recipient.*

Personal data processed by Oasmia are health status and demographics. Read more in section 2.11 below about Oasmias treatment of sensitive personal data. Personal data is in most cases anonymous and cannot be attributed to individuals.



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Those who receive the information are the Clinical Development department and the affected CRO companies, the registrant is informed in the agreement about the parties that have access to their personal data. Oasmia has entered into personal data processor agreements with hospitals and CRO companies to ensure the safe and legal handling of personal data is followed.

*For what purposes is personal data processed?*

Oasmia treats personal data to evaluate the effect of drugs in accordance with legal requirements. All clinical trials are conducted according to strict rules and implemented based on a test plan reviewed and approved by both the authorities and Ethics Review Board.

*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed.

Oasmia is required by the Swedish Medical Products Agency to establish and store the data before, during and at least 10 years after the completion of the clinical trial and the final report has been prepared. According to Regulation (EU) No. 536/2014 of the European Parliament and of the Council of 16 April 2014, Oasmia, as sponsor, is obliged to archive the main file of clinical trials for at least 25 years after the trial has been completed.

## **2.10 Visitors**

*What is the legal basis for treatment?*

Oasmia stores log books for external visitors which are necessary due to security requirements in accordance with GE-05-002 SOP that follows GXP regulations. The entry of Oasmias employees is also logged due to security reasons.

*What personal data is processed and who is the recipient?*

Personal data processed by Oasmia is name, entry and exit time, signature, company and contact person within Oasmia.

The person who receives the data is the security officer of Oasmia.

*For what purposes is personal data processed?*

Oasmia processes the data to fulfill security requirements in the event of incidents and to be able to troubleshoot problems.

*How long is personal data stored?*

Oasmia never stores data for longer than necessary for the purposes of the treatment. Oasmia, therefore, conducts regular checks of stored personal data and removes the data that is no longer needed.



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The data will be deleted no earlier than 60 days after establishment or in accordance with the provisions of the current SOP.

### **2.11 Sensitive personal data**

"Sensitive information" refers to personal data that discloses racial or ethnic origin, personal opinions, political opinions, religious or philosophical beliefs or membership in trade unions and treatment of genetic data, biometric data to uniquely identify an individual, health status or physical data, sexual life or sexual orientation of individuals.

Oasmia never handles sensitive data without the consent of the registered or without the support provided for in Article 9 of the General Data Protection Regulation, for example for fulfilling obligations or exercising special rights in labor law, social security and social protection or when processing is necessary to protect the registered or the fundamental interests of the person, when registered is physically or legally prevented from giving consent, in some cases in the context of trade union activity, if the data has already been published by the data subject, if necessary in the interest of an important public interest, if necessary for reasons relating, inter alia, to the assessment of workers' working capacity or the provision of healthcare or, if necessary, for statistical purposes.

When handling sensitive data, Oasmia always takes appropriate safety precautions to protect the data. Personal data is never available to more people than necessary. This applies both when Oasmia acts as a personal data controller or personal data processor.

## **3 How do we process personal data?**

### **3.1 General**

Oasmia collects, processes and stores personal data, in a lawful, correct, open and effective manner and only in cases where the personal data is necessary. Oasmia shall consistently process personal data in a way that avoids violating the privacy of the registered. Any processing of personal data is handled very carefully and the personal data is protected by adequate security measures.

Oasmia can process personal data by collecting and processing the data independently and by collecting personal data from, for example, authorities and hospitals. Oasmia can thus act as a personal data controller but also in some cases as a personal data processor.

In some cases, Oasmia is jointly responsible for personal data with another party. In many cases, when we collect personal data, we will, as mentioned above, comply with statutory or contractual requirements or requirements that are necessary for entering into an agreement with an employee. In cases where the registrant does not provide the information we request, in some cases, we may not conclude an agreement or fulfill our obligations in an agreement with the registered. If the registrant has any doubts or concerns about leaving certain personal data, he or she may contact Oasmia (see below under Contact Information) and we may provide the registered further information.



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### **3.2 Personal Data Controller**

Oasmia may, from time to time, need to provide information to relevant third parties (including but not limited to situations where we have a legal obligation to do so). To ensure that your personal data is processed in a safe and lawful manner, Oasmia has a routine of entering into personal data processor agreements with any external party that processes personal data on Oasmia's behalf. In such agreements, the subject matter of the treatment is always stated, the duration of the treatment, the nature and purpose, the type of personal data and the categories of registered persons and our obligations and rights as the personal data controller. Furthermore, Oasmia always provides documented instructions to the personal data processor that they are required to follow.

### **3.3 Oasmia as a personal data processor**

In each case, where Oasmia is a personal data processor, Oasmia shall enter into personal data processor/assistant agreements with the personal data controller. The data controller determines the purposes and storage time for the personal data. Therefore, when Oasmia is a personal data processor, personal data is always treated in accordance with the personal data processor agreement and in accordance with the data controller's instructions. If Oasmia is uncertain about the meaning of the instructions or the scope of responsibility, Oasmia has the routine to request clarification from the data controller.

Oasmia always ensures that personal data is protected by appropriate security measures and that access to personal data is provided only to a limited circle within Oasmia's business that needs access to the data. As mentioned in the following chapters, the registered has the right to access and correct their personal data. In such cases, the registrant is advised to contact the Data Protection Officer at Oasmia, see contact details in Chapter 5 below.



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## 4 Registered rights

### 4.1 Right of access

The registered person has the right to contact Oasmia as a personal data controller and processor and request access to the personal data processed by Oasmia, get information of the purposes of the processing and information about receiving parties of the personal data.

Oasmia shall, as a personal data controller, provide the registered with a free copy of the personal data being processed. In case of additional copies Oasmia may charge an administration fee.

### 4.2 Right to rectification, deletion or restriction

The registered person is entitled to get their personal data without undue delay rectified or, under certain conditions, limited or deleted. If the registrant considers that Oasmia processes personal data that is incorrect or incomplete, the registrant may require these corrected or supplemented.

The registered person also has the right to have their data deleted, for example, in case they are no longer necessary or if the processing is based on consent and has been revoked. If the registrant requests that the data be corrected, deleted or restricted in treatment, Oasmia as a Personal Data controller shall, as a routine, inform each recipient of the Personal Data of the Registrar's request with reasonable effort.

### 4.3 The right to object

The registered person is entitled to object to the processing of his personal data at any time if the legal basis for the treatment is a public interest or legitimate interests in accordance with Article 6 (1) (e) and (f) Data Protection Regulation.

### 4.4 Right to data portability

The registered person has the right to obtain the personal data provided by him/her to the data controller and has the right to transfer this information to other data controllers. This applies, however, provided that

- (a) it is technically possible and
- (b) the legal basis for the treatment is consent or that the processing of the personal data was necessary for the performance of an agreement.



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#### **4.5 Right to revoke consent**

If the personal data processing is based on the consent, the registered has the right to revoke his/her consent at any time. Such revocation does not affect the legality of personal data processing before the consent was revoked.

#### **4.6 Rights when profiling**

The registered person is entitled not to be subject to decisions based solely on automated processing, including profiling, which may have legal consequences or equivalent to the registered. However, this does not apply

(a) if such processing is necessary for the conclusion or performance of an agreement with the data subject; (b) if such processing is permitted under applicable law; or (c) if the legal basis is the consent of the registered.

#### **4.7 Right to complain to Datainspektionen**

The registrant is entitled to address complaints to the Datainspektionen.

##### *Contact details*

Phone number: 08-657 61 00

E-mail address: [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se)

#### **4.8 Contact information**

For questions about the Policies or for other personal data requests, please contact Oasmias Data Protection Officer.

##### *Contact details*

Name: Agapi Sahakyan

Phone number: 018-50 54 40

E-mail address: [dataprotection@oasmia.com](mailto:dataprotection@oasmia.com)

#### **4.9 Changes to the Policy**

Oasmia reserves the right to amend and update the Policy. In case of material changes to the Policy or if existing information is to be processed otherwise than specified in the Policy, Oasmia will inform you appropriately.