

## Privacy Policy

This Privacy Policy (“the Policy”) applies to your access to the SophiaTX website [www.sophiatx.com](http://www.sophiatx.com) and its subpages, e.g. [earlyadopter.sophiatx.com](http://earlyadopter.sophiatx.com) (jointly as “the Website”), which are operated by Equidato Technologies AG, with its registered seat at Innovation Tower, Industriestrasse 33, 5242 Lupfig, the Helvetic Confederation, identification No: CHE-174.378.377, registered at the Commercial register of canton Aargau, the Helvetic Confederation (“Equidato Technologies”, “we” or “us”).

By accessing the Website you acknowledge that you have read and understood the Policy, accept the Policy and agree to be bound by them. The Policy is intended for both, individuals as well as business customers.

The Policy governs your access to the Website. If you don't agree with (or cannot comply with) the Policy, you may not access the Website. If we make changes to the Policy, we will provide notice of those changes by updating the “Last Updated” date above and posting notice on the Website, which you need to accept.

In order to use the Website, you need to (a) be 21 or older (please note that in some countries specific age restrictions may apply) or to have your parent or guardian's consent to the Policy, and (b) have the power to enter into legal relationship with us and not be barred from doing so under any applicable laws.

The protection of personal data of individuals (“the Data Subjects”) is a top priority for us. It is crucial that you understand how and why we collect, use and share information about Data Subjects when they access and use the Website or when they otherwise interact with us. We have taken appropriate technical and operational precautions to protect the personal data retained by us against unauthorized access and misuse. Our security procedures are revised regularly and adapted to reflect technological progress.

### 1. INFORMATION ABOUT INDIVIDUALS WE COLLECT

- 1.1. Within the Website “Early Adoption Program” pre-registration process we collect First name, Last name, e-mail address, phone number, country of Data Subjects and potentially other information they provide to us during the pre-registration process, in order to be able to communicate with these pre-registered users about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to these pre-registered users.
- 1.2. Within the Website “Contact Us” form we collect First name, Last name, e-mail address of Data Subjects and potentially other information they provide to us in the Contact Us form, in order to be able to communicate with these Data Subjects about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to these Data Subjects.
- 1.3. You may choose to provide other information directly to us, e.g. with respect to the promotions and related services, your requests and notifications, customer support or other communication with us.
- 1.4. We will process the information that we collect about you during the term, which is necessary for the purposes for which these information are processed. Other personal data, for which you give us your consent with personal data processing will be processed during the term as indicated in the respective consent.

- 1.5. We do not intend to process special categories of data, such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life or sexual orientation, unless the individual has given explicit consent to the processing of such data.
- 1.6. We take reasonable measures to help protect information about Data Subjects from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.

## **2. DATA PRIVACY FOR THE USE OF GOOGLE ANALYTICS**

- 2.1. This Website uses web analyses service Google Analytics provided by Google Inc. This service requires the use of "Cookies" – See section Cookies, Web Beacons and Other Technologies below. Some information/data about your usage of the Website, created by the cookie may be transferred to a Google server and saved there for analytic purposes. By order of Equidato Technologies, Google will use this information/data to evaluate and analyses your usage of the Website, to create reports about the Website activities, and to deliver further services regarding the usage of the Website or the internet. The IP-address, transferred as part of Google Analytics by your browser, will not be merged with other data of Google.

## **3. COOKIES, WEB BEACONS AND OTHER TECHNOLOGIES**

- 3.1. We collect information from user visits to the Website and users use of our cloud offerings and our software products to help us gather statistics about usage and effectiveness and personalize users' experience. We do so through the use of various technologies, including scripts, tags, Local Shared Objects (Flash cookies), Local Storage (HTML5) beacons, and one called "cookies".
- 3.2. A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure website usage (such as number of visitors and duration of visit) and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience to a website by being associated with profile information or user preferences. Over time this information provides valuable insight to help improve the user experience.
- 3.3. Cookies in our software products can be turned off in the product itself. Since cookies allow you to take advantage of some of our Websites' features or features of our software products and SaaS offerings, we recommend that you leave them turned on. If you block, turn off or otherwise reject our cookies, some websites may not display properly.
- 3.4. Some of our business partners set web beacons and cookies on our site. In addition, third-party social media buttons may log certain information such as your IP address, browser type and language, access time, and referring Website addresses, and, if you are logged in to those social media sites, they may also link such collected information with your profile information on that site. We do not control these third-party tracking technologies.

## **4. HOW WE SHARE INFORMATION**

- 4.1. We will not share, sell, or give away any of your personal information to third parties, unless one of the following circumstances applies:

- (a) We may share information (and will attempt to provide you with prior notice, to the extent legally permissible) in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request;
  - (b) We may share information between and among us, and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
  - (c) We may share information with your consent or at your direction.
- 4.2. We may share aggregated or anonymized information, which cannot reasonably be used to identify you.

## **5. TRANSFER TO OTHER COUNTRIES**

- 5.1. Your personal data will be transferred, processed and stored on servers located in the Helvetic Confederation. We may subcontract processing to, or share your information with, third parties located in countries other than your home country. In order for us to be able to provide you with the access to the Website, you acknowledge that your personal data may be processed, transferred and stored in other countries, where you may not have the same rights as you do under your local law.
- 5.2. In addition, your personal data may be transferred to countries, which do not ensure an adequate level of protection ("the Third Countries"). Hereby you specifically acknowledge that your personal data may be transferred to Third Countries. In such a case, we will take necessary effort to make use of solutions that will provide you with enforceable and effective rights as regards the processing of your data once those have been transferred, so that you may continue to benefit from fundamental rights and respective safeguards.

## **6. RIGHTS OF THE DATA SUBJECTS**

- 6.1. You as a Data Subject have the right to request the access and rectification or erasure of personal data or restriction of processing or to object to processing as well as the right to data portability (when it is technically feasible). Further, you have a right to lodge a complaint with a respective supervisory authority.
- 6.2. The right to rectification is the right of the Data Subject to obtain without undue delay the rectification of inaccurate personal data concerning him or her.
- 6.3. The right to erasure is the right of the Data Subject to obtain the erasure of personal data concerning him or her without undue delay, where:
- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - the user withdraws consent on which the processing is based and where there is no other legal ground for the processing;
  - the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
  - the personal data have been unlawfully processed;

- the personal data have to be erased for compliance with a legal obligation in the law;
  - the personal data have been collected in relation to the offer of information society services.
- 6.4. The exercise of the right to erasure is subject to respective limitations set by the applicable law.
- 6.5. The Data Subject has the right to restriction of processing, when:
- the accuracy of the personal data is contested by the Data Subject, for a period enabling us to verify the accuracy of the personal data;
  - the processing is unlawful and the user opposes the erasure of the personal data and requests the restriction of their use instead;
  - the personal data are no longer needed for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defense of legal claims;
  - the Data Subject has objected to processing, pending the verification whether the legitimate grounds of us override those of the Data Subject.
- 6.6. The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to us, and have the right to transmit those data to another controller, where technically feasible, where the processing is based on consent pursuant or on a contract and the processing is carried out by automated means.
- 6.7. The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on respective provisions of the law, including profiling based on those provisions.
- 6.8. Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- 6.9. Subject to the respective statutory limitations set by the applicable law, the Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

## **7. QUESTIONS & CONTACT INFORMATION**

- 7.1. Questions or comments about the Policy or the Website may be directed to [info@sophiatx.com](mailto:info@sophiatx.com).