

HERCULES and ATLAS Studies Website Privacy Notice

Last updated: May 2024

1. Introduction

Lupin Atlantis Holdings SA ("**Lupin**", "**we**" or "**us**") is pleased that you are visiting our website. We are committed to improving the lives of patients affected by underserved neurological disorders through the HERCULES and ATLAS Studies (the "**Studies**"). Your data protection and data security are very important to us.

This Privacy Notice (or "**Notice**") communicates to you how Lupin will make use of information that identifies or can reasonably be used to identify you ("**personal data**") when you visit the website at MyotonicDystrophyStudy.com (the "**Site**"), and describes your data protection rights, including the **right to object** to some of the processing which Lupin carries out. More information about your rights, and how to exercise them, is set out in the "Your choices and rights" section.

2. Data Controller

The body that determines how and why your personal data is processed is defined as the "Controller". The Controller of your personal data is:

Lupin Atlantis Holdings SA

Landis + Gyr Str. 1,
CH - 6300 Zug, Switzerland
Phone +41 (0)52 633 70 00
E-Mail: customerserviceLEG@lupin.com

You can contact us at the details above if you have questions about this notice or wish to contact us for any reason in relation to personal data processing.

Compliance with applicable laws

When using your Personal Data, Lupin as Controller will always comply with the relevant data privacy and data protection laws, which includes regulatory and national law requirements that may apply to such use and processing and, where applicable, giving you the specific rights that apply in the country where you reside (altogether "Applicable Data Protection Law")

3. Data Protection requirements

Lupin will comply with data protection law. This means that the Personal Data we hold about you must be:

- a) Used lawfully, fairly and in a transparent way;
- b) Collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
- c) Relevant to the purposes we have told you about and limited to those purposes only;
- d) Accurate and kept up to date;
- e) Kept only for such time as is necessary for the purposes we have told you about; and
- f) Kept securely

4. Data Processing

a) Device Information

When you access and use our website, we collect the personal data that your browser automatically transmits to our server. This information is temporarily stored in a log file.

The following personal data is processed to the extent necessary for the provision of a functional website and our contents and services ("**Device Information**"):

- IP address
- Main language of browser
- URL of the page that was viewed prior to the current page – i.e. the website from which access was made (the "**referrer URL**")
- Screen resolution
- Type of browser, browser version, device type, and operating system
- Network type (e.g. WiFi, broadband, or mobile)
- The name of your internet access provider

b) Personal data we collect from you

We collect your personal data, including Device Information, from you and process it for the following purposes and based on the following legal bases under GDPR (where applicable):

Category of personal data	Purpose for processing	Legal basis
Device Information (IP address) and your language preference (if selected using the dropdown on the Site)	To tailor the language of the Site to suit your location/preference.	Our legitimate interest in ensuring your user experience is optimized to your needs.
Device Information	We may be required by applicable law to disclose the Device Information in our server logs to law enforcement bodies or regulators.	Legal obligation
Device Information	To the extent necessary for the provision of a secure and functional website.	Necessary for our performance of a contract with you (our terms of use for provision of the website).

c) Your health data

We do not collect or process your health data when you access or use the Site. If you take part in the Studies, you will be provided with a supplementary privacy notice as part of the Patient Information Sheet which describes how your health data would be processed in connection with the Studies.

5. Retention

We retain your personal data for no longer than is necessary for the purposes for which it is processed. More particularly:

- In general, we apply a retention period of no more than 6 months. The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation of the website.
- Where we collect your personal data to tailor the language of the Site to suit your location/preference, this is retained for no longer than your browser session.
- Further storage may take place in individual cases if this is required by applicable law.

6. Data sharing & location

We share your personal data with the following categories of recipient:

- **Our hosting provider** – our website is hosted by a third party provider on servers located in the UK.
- In some scenarios we may be required to share your personal data with **law enforcement agencies or regulators** in accordance with applicable law.
- In the event that our business is sold or integrated with another business your details will be passed to the **new owners of the business** in order to continue to operate the Site.

The Site is hosted on secure servers in the UK.

8. Your Choices & Rights as a Data Subject

If you are based in the UK or the EU, you have at least the following rights:

Right	Summary
The right of access	Enables you to receive a copy of your personal data
The right to rectification	Enables you to correct any inaccurate or incomplete personal data we hold about you
The right to erasure	Enables you to ask us to delete your personal data in certain circumstances
The right to restrict processing	Enables you to ask us to halt the processing of your personal data in certain circumstances
The right to object	Enables you to object to us processing your personal data on the basis of our legitimate interests (or those of a third party). Your objection will be upheld, and we will cease processing your personal data, unless the processing is based on compelling legitimate grounds or is needed for the exercise or defence of legal claims that may be brought by or against us
The right to data portability	Enables you to request us to transmit personal data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible

These rights may be limited if, for example, fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to retain or have compelling legitimate interests to keep.

If you wish to exercise any of these rights, please email us at customerserviceLEG@lupin.com so we can assist you. Please note in some cases we may request additional information from you to verify your identity before we can respond to your request.

10. Data Security and Security Measures

We are committed to protecting your privacy and treating your personal information confidentially. In order to avoid any manipulation, loss or misuse of your data stored by us, we take extensive technical and organizational security measures that are regularly reviewed and adapted to technological progress. Our security measures are continuously revised in line with technological developments. Our employees are obliged to maintain confidentiality. This includes, among other things, the use of recognized encryption methods (SSL or TLS).

However, we would like to point out that due to the structure of the internet, it is possible that the rules of data protection and the above-mentioned security measures may not be observed by other persons or institutions for which we are not responsible.

In particular, unencrypted data - e.g., if this is done by e-mail - can be read by third parties. We have no technical influence on this. It is the responsibility of the user to protect the data provided by him against misuse by encryption or in any other way.

11. Minors

This website, and the information provided on this website, are not designed or intended for use by children 16 years and younger. Lupin also do not knowingly collect, process or store any Personal Data from any users under the age of 16 without the verifiable consent of a parent or guardian prior to collecting, processing or storing information collected either directly or indirectly through the use of this websites. Parents or guardians of minors may have the right to request to view or delete Personal Data provided by the child either directly or indirectly through the use of this website.

12. Contact Information

You can get in touch with us with any questions about this notice or our data processing in connection with the Site using the contact details [here](#).

If you have questions or concerns about this Privacy Notice or the processing of your personal data, you may also contact our external Data Protection Officer at:

Bird & Bird DPO Services SRL
Avenue Louise 235 b 1
1050 Brussels, Belgium
Email: dpo@lupin.com

If you have any concerns, you have the right to complain to a data protection authority in the country that you reside in or the country of your place of work or the country where the alleged infringement took place.

13. Update to this privacy notice

As changes to the law or changes to our corporate processes may require an adaptation of this Privacy Notice and we refer to this page to review and read this website Privacy Notice regularly. The most current version of this statement can be accessed on this website any time under “Privacy Notice”, saved and printed out. This Privacy Notice was last updated as of the “Last Updated” date shown above.