

1 PURPOSE

The purpose of this policy is to define and establish the Vision, Mission, and Privacy Strategy pertaining to Persona Data and building trust with our stakeholders that Accelevir Diagnostics (Company) is transparent and trustworthy with the use of Personal Data implemented at the Company. The Vision, Mission and Privacy Strategy outlined in this document shall govern and support the underlying principles of our handling of Personal Data within the scope of defined business activities.

2 SCOPE

The Company recognizes its responsibility to collect Personal Data only as needed and process said data fairly and respectfully. This includes Personal Data that has been disclosed to the Company and marked as Confidential Data. The Company shall not request or accept such Personal Data unless it is needed to fulfill contractual obligations and Company mission.

This document applies to commercial activities involving the processing of Personal Data undertaken by the Company and by any person operating under the direct control of the Company. The Company shall communicate this standard to any parties including employees that hold Personal Data, shall provide notifications and if applicable written agreement for acceptance of Company data protection standards.

3 DEFINITIONS

Company: Accelevir Diagnostics

GDPR: General Data Protection Regulation

QA: Quality Assurance

Personal Data: Any and all data (regardless of format) that (i) identifies or can be used to identify, contact or locate a natural person, or (ii) pertains in any way to an identifiable natural person.

4 RESPONSIBILITIES

The Company is responsible for using professionally reasonable efforts to maintain compliance with the principles embedded in this document. The Company is also responsible for training employees in the protection of Personal Data, to create awareness, and impart the Company expectations of treatment of Personal Data with respect and privacy. The Company shall train employees and hold individuals responsible for implementing and maintaining compliance with privacy and data protection.

The Company recognizes the responsibility to collect and process Personal Data fairly and lawfully. This includes the data of people that shall disclose such Personal Data to the Company in all areas where Personal Data is necessary to carry out the business and contractual obligations of the Company.

5 VISION, MISSION, AND PRIVACY STRATEGY

5.1 Overview

The Vision, Mission, and Privacy Strategy for Data Protection are consistent with the Company corporate mission and values.

The Company is committed to ensuring the Privacy and Protection of Personal Data by respecting legal and ethical requirements regarding data protection and privacy, and the adoption of best practices working positively to prevent any misuse of Personal Data.

Additionally, the Company recognizes that people trust the company with their Personal Data so that it can advance and enhance the mission of providing the best solutions in research and development and having a positive impact on human health.

5.2 Data Protection Principles

These five Data Protection Principles guide the Company's efforts in managing and protecting Personal Data. These principles are widely available, published for all internal and external audiences, including collaborators, employees, and third parties:

- **Principle 1 – Transparency:** The Company is transparent about the Personal Data that is processed, how and why it is collected, how it is used, and with whom it is shared.
- **Principle 2 – Legitimate and Meaningful Collection:** The Company links all collection and use of Personal Data to specific business purposes related to how the Company operates, innovates, or engages.
- **Principle 3 - Responsible and Sustainable Processing:** The Company uses Personal Data only in ways that are compatible with the purposes for which it was collected and supports individuals in exercising their rights regarding their Personal Data to the extent it is compliant with US Federal, State, Local, or other regulatory laws.
- **Principle 4 - Security, Integrity, and Quality:** The Company protects Personal Data using professionally reasonable safeguards to prevent loss, unauthorized access, use, alteration, or unauthorized disclosure and takes appropriate measures to keep Personal Data accurate and updated.
- **Principle 5 - Minimum Retention:** The Company only retains Personal Data for as long as they can lawfully use it or are required to store such data.

All together, these principles regulate the overall processing of Personal Data. They guide compliance under the General Data Protection Regulation (GDPR) and all other privacy regulations and national laws under which the Company operates.

6 BASIS OF THE CONTEXT

The Vision, Mission, and Data Protection Strategy address privacy from three main bases:

- **Legal Basis:** The Company shall not directly solicit Personal Data from entities located outside the United States unless such Personal Data is required for performance of business, service, legal, and/or product development obligations.
- **Basis of Ethical Values:** The Company's ethical values require respect for all professionals, employees, suppliers/vendors, and customers; for this reason, the Company is committed to operate in an ethical manner and with an eye to values and beliefs.
- **Business Basis:** The Company's commitment to data protection will translate into business best practices, and brand reputation.

This context drives our Vision, Mission, and Data Protection Strategy into a data protection framework consistent with the Company's legal requirements, business obligations, and ethical values, while respecting the privacy of individuals' Personal Data.

7 VISION

Establish excellence and trust that the Company shall respect Personal Data and operate under high standards of integrity and professional standards.

8 MISSION

- **Consistent practices:** Privacy practices are applied and integrated into business processes.
- **Responsibilities:** Responsibilities for privacy are clearly defined.
- **Awareness and training:** Privacy awareness is maintained and implemented on a Company-wide basis.
- **Adequacy of data transfer:** The Company adopts mechanisms to support the adequacy and commitment to privacy.
- **Security Improvements:** Data security is viewed as an ongoing effort and the Company shall commit to best practices and reasonable business standards.

9 STRATEGY

Establish privacy and data protection as a company culture for implementing its operations using reasonable professional standards.

Ensure that all activities involving the collection, processing, and storage of any individual's Personal Data are protected and compliant with stated standards. Promote data protection compliance across the organization.

10 CHANGES TO THE STRATEGY

10.1 Business Changes

Business changes that result in a significant change in the nature of Personal Data processing may require a review of this document: such reviews will be developed and approved by the Managing Director and Quality Assurance (QA).

10.2 Regulatory Changes

Regulatory changes may require revisions to this document. Such reviews will be developed and approved by the designated individuals and/or entities with accountability for implementation of the Personal Data protection policies.