

### **What is this Privacy Statement all about?**

Firstly, it's great that you'd want to be a part of developing game changing medicines, and we need to notify you about your privacy rights when using our Careers platform, where Nykode Therapeutics ASA is the data privacy controller for positions in Norway and where Nykode Therapeutics Denmark A/S is the data privacy controller for positions in Denmark (together "Nykode Group").

For the purposes of this Privacy Statement when we use "we", "us" or "our" in this notification, we are talking about the Nykode Group.

### **1. What personal data does the Nykode Group collect?**

We collect personal data from you that makes it possible for us to assess your candidacy for our available job positions such as:

- Profile data (e.g. name, your username and password)
- Contact information (e.g. address, email, telephone number)
- Background, education and CV information (e.g. references to education, degrees, grades)
- Application (e.g. motivated application with external references)
- Photograph (e.g. portrait attached the application)

If you as a candidate are invited for an interview, we may also ask you to provide the following information, if relevant:

- References check from e.g. former employers
- Criminal records
- Test results
- Financial information (e.g. bank account number, salaries, debts, social benefits, pension, credit report)
- Special categories of personal data (e.g. health data or your union memberships if relevant for the specific position)
- LinkedIn and other relevant social media profiles

The Nykode Group is an equal opportunity employer (in accordance with applicable law) and makes all employment-related decisions entirely on merit and qualifications. Consequently, you should only include personal data relevant for the review of your application and leave out personal data such as your race or ethnic origin, your political or philosophical orientation, your religious beliefs, your union membership or your sexual orientation.

Be specifically aware if you are:

- applying for a position where health certification is required by law or our internal policy, you may also be required to participate in a health examination in compliance with applicable local law;

- applying for a position where a criminal record, credit report or visa/work permit etc. is required by law or our internal policy, you may be required to provide these as well, in compliance with local law; and
- already employed within the Nykode Group, personal data collected by us as part of this recruitment process, including but not limited to information on your internal job history, appraisals, assessment and profiling results, education and courses will automatically accompany your application when you apply for a new position internally.

If your application is successful, the job offer may be conditional on pre-employment checks being carried out to our satisfaction.

## **2. Which are the purposes for processing your personal data?**

When you create a Careers Account, we will process your personal data as part of our contractual obligations giving you access to and tools on our Nykode Group Careers platform, cf. Article 6 (1) (b) of the GDPR.

We will process the personal data submitted by you and/or collected externally (through reference, tests and relevant social medias), for the legitimate purpose of assessing your candidacy for available positions and informing you when having signed up to a job agent where our legitimate interest overrides your interest in the information not being processed, cf. Article 6 (1) (f) of the GDPR.

Special categories of personal data (e.g. health data or your union memberships if relevant for the specific position) is processed where this is necessary for the purposes of carrying out obligations and exercising specific rights of the Nykode Group or for you in the field of employment and social security and social protection law in so far as it is authorized by law, cf. Article 9 (2) (b) of the GDPR.

Finally, the Nykode Group processes personal data where it is necessary to establish, exercise or defend legal claims, and to protect the Nykode Group, Nykode brand or Nykode products, cf. Article 6 (1) (f) and Article art. 9(2) (f) of the GDPR.

## **3. Transfer and protection of your personal data**

We do not transfer personal data to countries outside the EU/EEA unless we have implemented adequate contractual safeguards to protect your information. You can always request a copy of applicable transfer agreements, which includes the transfer of personal data, by contacting us.

Your personal data will be accessed by the Nykode Group employees and entities on a need-to-know basis only. Your personal data will only be disclosed to third parties if you have given your

consent hereto or if the Nykode Group is allowed to disclose the information under applicable law, including to:

- partners and other business contacts being subject to confidentiality, and
- governmental authorities (e.g. tax authorities, the police and other public authorities requesting information and where the Nykode Group is either obligated to provide the information or it is assessed that the Nykode Group is otherwise allowed to provide the information).

#### **4. Automated decisions**

The Nykode Group uses automated decision-making in processing your personal data. An example is our fraud prevention and detection efforts on our platforms.

You may request that the Nykode Group provides information about the decision-making methodology and ask us to verify that the automated decision has been made correctly.

We may reject the request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias.

#### **5. Security measures.**

The Nykode Group has implemented technological and organizational measures to safeguard your personal data from unauthorized or improper use while it is in our possession. We store personal data on servers with limited access located in secured facilities. Our security measures are evaluated on an ongoing basis. We use best endeavors to ensure an appropriate level of security tailored to the specific risks of the personal data being processed and require the same from our suppliers and sub-contractors.

#### **6. Personal data retention**

The Nykode Group has a retention scheme with retention terms applicable country wise. We delete personal data in accordance with this retention scheme. Any extension of the retention terms will be made based on the applicable law requirements (such as documenting legal compliance or disputes or for archiving purposes).

Personal data may also be kept for a longer period of time if it is necessary for us to retain the information for handling and defending a claim or a dispute.

#### **7. Your privacy rights**

In connection with our processing of your personal data, you have the following right to ask us:

1. for information about or access to your personal data. There are some exemptions, which means you may not always receive all the information we process;
2. to stop using your personal data by objecting. However, it only applies in certain circumstances, and we may not need to stop the processing of your personal data if we can give legitimate reasons to continue using your personal data;
3. to erase your personal information in certain circumstances;
4. for a copy of your personal data in a structured, commonly used and machine-readable format. If technically feasible, you may request that the personal data is transmitted directly to another company or person acting as a data controller;
5. to rectify the personal data you think is inaccurate. You also have the right to ask us to complete the personal data you think is incomplete; and
6. to restrict the processing of your information in certain circumstances.

To exercise your rights, please contact us at [info@nykode.com](mailto:info@nykode.com). We will respond to your inquiry as soon as possible, and at the latest within thirty (30) days.

If you wish to exercise your rights, we will require that you confirm your identity by providing additional information. We do this to ensure that third parties are not given access to personal data.

## **8. Complaints**

If you believe that our collection, storage and use of Personal Data does not comply with our Privacy Statement or does not comply with privacy law, you may contact us or complain to the local data protection authority.

## **9. Changes to our Privacy Statement**

The Nykode Group may change this notice from time to time in the future. Any such changes will be posted here and, where appropriate, notified to you in writing. We advise you to check back frequently to see any updates or changes.