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Our commitment

ABIVAX fully understands the importance of privacy and the protection of personal data and is committed to ensure an adequate level of data protection for all persons with whom Abivax has dealings. This includes, notably:

- participants in clinical trials,
- healthcare professionals,
- users of our website,
- representatives of our contractors and business partners,
- representatives of the scientific community etc,
- Abivax's personnel,
- job applicants.

What you will find in this document?

This Global Privacy & Data Protection Policy describes Abivax's global practices to ensure an adequate protection of personal data, i.e. any information relating to an identified or identifiable natural person, for all data processing carried out in the framework of its business and activities. The objective of this Policy is to help you understand:

- **THE PURPOSES:** for what reasons and purposes Abivax processes your Personal Data
- **ON WHAT GROUND:** on what basis does Abivax process your Personal Data
- **WHERE FROM:** from what sources does Abivax collect your Personal Data
- **WHO:** who are the authorized parties that Abivax may disclose your Personal Data to
- **WHERE:** where Abivax and its authorized parties may process your Personal Data
- **HOW SECURE:** what Abivax does to protect your Personal Data
- **HOW LONG:** Abivax's approach to defining the term of retention of your Personal Data
- **YOUR RIGHTS:** what your rights are and how you can exercise them
- **HOW TO CONTACT US:** where and how you can reach us if you wish to exercise your rights or if you have a question

What processing activities does this Policy cover?

This Policy is intended to apply to all processing activities Abivax conducts towards the persons it deals with in its professional business activities.

Specific privacy and data protection information notices and/or consent forms will, if necessary, be communicated to you regarding specific situations where Abivax may process your Personal

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Data. These Privacy Notices shall describe in more detail how your Personal Data will be processed in relation with the processing in question. If the legislation of your country so requires, this Policy and/or Privacy Notices may be supplemented by local mandatory provisions, as the case may be.

Validity and evolution of this Policy

This Policy may be modified by Abivax, from time to time, in particular to adapt its terms to evolutions or changes of applicable legislations and/or to Abivax's practices. Changes will be available on Abivax's website. We invite you to check this Policy periodically.

The purposes

Abivax will always collect your Personal Data for explicit and legitimate purposes

Abivax collects your Personal Data for the following purposes:

- **to carry out our business operations** ; respond to your requests; to keep track of our interactions and meetings, such as when you contact us for information and support ;
- **to comply with legal or regulatory obligations** that apply to Abivax ; monitor safety ; manage adverse events ; carry out prevention and investigatory activities ; carry out administrative formalities, registration, declarations or audits.
- **to provide patient support**, healthcare support services, patient engagement and prescription information ; manage claims, including insurance claims ;
- **to conduct research and development**; carry out clinical studies, registries and trials ; manage and validate the recruitment and participation of individuals to studies, trials and other operations ; carry out market studies ;
- **to provide you access to online services, application and platforms** ; manage your online accounts ;
- **to allow us to identify or authenticate you** ; provide or verify your credentials including via government-issued ID, healthcare professional number, driver's license data, or passport data.
- **to improve and develop our products**; identify usage trends and develop new products; track and respond to safety concerns ;
- **to allow us to communicate with you** ; respond to your requests or inquiries ;
- **to process payments we may need to issue in a specific situation**; verify your financial data ; facilitate further payments.
- **to offer donations and sponsorships** ;
- **to protect our rights and interests** ; protect the health, safety, and security of Abivax personnel and premises ; carry out internal audits, asset management, system and other business controls ; manage business administration (finance and accounting, fraud monitoring and prevention) ; maintain the security of our operations ; protect our rights, privacy, safety or property, to allow us to pursue available remedies or limit the damages that we may incur as necessary ; to protect ourselves against possible fraudulent actions.

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On what ground Abivax will always process your Personal Data lawfully?

Depending on the data processing at stake, Abivax will generally process your Personal Data on either one of the following legal basis:

- **your prior consent** : where you have clearly expressed your approval of Abivax's processing of your Personal Data. In practice, this will generally mean that Abivax will ask you to sign a document, or to fill-in an online "opt-in" form or to follow any relevant procedure to allow you to be fully informed and then either clearly accept or refuse the data processing envisaged.
- **a contractual relationship** between you and Abivax: in such case, the processing of your Personal Data is generally necessary to the execution or the performance of the contract; this means that if you do not wish Abivax to process your Personal Data in that context, Abivax may or will be obliged to refuse to enter into such contract with you or will not be able to provide the products covered in this contract.
- **legal obligations** applicable to Abivax's activities ; for instance, Abivax is required to implement pharmacovigilance procedures to monitor adverse effects of Investigational Medicinal products, which generally involves the collection and retention of Personal Data.
- **the "legitimate interest"** of Abivax in the sense of applicable data protection law. In such a case, Abivax shall consider your fundamental rights and interests in determining whether the processing is legitimate and lawful.

Where does the Personal Data come from?

Abivax will always collect Personal Data from trusted sources

Abivax may collect your Personal Data from different sources:

- **Data that you communicate to us** through various media, through registrations, direct and indirect interactions with Abivax. For example, data you provide to submit an online application, to send us a request for information, etc.
- **Data that we collect in the purpose of our clinical trial** for which you give a written data protection information consent.
- **Data that we collect automatically**, for instance when following your interactions with our websites, such as cookies.
- **Data that we collect in accordance with applicable law from public sources available**, including data that is published by you in all supports.

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Who has access to Personal Data?

Abivax will share your Personal Data only with authorized parties

For the purposes described above, Abivax may need to share your Personal Data with the following authorized third-parties:

- **Abivax's affiliated compagnies**, their representatives and employees, provided they have a need-to-know,
- **selected suppliers, service providers or vendors** acting upon our instructions for website hosting, data analysis, payment processing, order fulfillment, email delivery, auditing, etc.
- **legal or administrative authorities**, as required by applicable laws including laws outside your country of residence
- **potential acquirers and other stakeholders** in the event of a merger, legal restructuring operation such as, joint venture, assignment, spin-off or divestitures.

Abivax may need to share your Personal Data with other third-parties, in which case you will be duly informed through the applicable Privacy Notice.

In any case, Abivax will require that such third-parties:

- undertake to comply with data protection laws;
- will only process the Personal Data for the purposes described in this Policy ; and
- implement appropriate technical and organizational security measures designed to protect the integrity and confidentiality of your Personal Data.

Where Personal Data may be transferred?

Abivax will ensure that transfers of your Personal Data outside EU are safeguarded

Abivax is a company with subcontractors located in many countries around the world. For that reason, Abivax may need to transfer (via access, visualization, storage..) your Personal Data in other jurisdictions, including from the European Economic Area to outside the European Economic Area, in countries which may not be regarded as providing the same level of protection as the jurisdiction you are based in.

Safeguards for international transfers of Personal Data: in cases where Abivax needs to transfer Personal Data outside the European Union, it shall ensure that adequate safeguards, as required under applicable data protection legislation, will be implemented.

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How secure?

Abivax will implement security measures to protect your Personal Data

We have implemented a variety of technological and organizational procedures and measures to ensure the integrity and confidentiality of your Personal Data from unauthorized access, use and disclosure.

These measures shall take into account the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.

For instance, we store your Personal Data on servers that have various types of technical and physical access controls, which may include, for instance, if appropriate, encryption. We may also pseudonymize Personal Data (for patient involved in clinical trial) to ensure that no personally identifiable information is communicated to third parties.

How long?

Abivax will retain your Personal Data for no longer than necessary

Abivax will retain your Personal Data only for the period necessary to fulfill the purposes outlined in this Policy.

As an exception, Abivax may be required to retain your Personal Data for longer periods as required or permitted by law, or as necessary to protect its rights and interests. In such a case, you will be informed of the intended retention period in the applicable Privacy Notice.

Your rights?

Abivax will ensure that you can exercise your rights pertaining to your Personal Data

You can exercise your rights as provided by data protection laws.

To that end, subject to applicable laws and regulations, Abivax informs you that you are entitled:

- **to have access** upon simple request to your Personal Data – in which case you may receive a copy of such data (if requested), unless such data is made directly available to you;
- **to obtain a rectification** of your Personal Data should your Personal Data be inaccurate, incomplete or obsolete;
- **to obtain the deletion** of your Personal Data in the situations set forth by applicable data protection law ('right to be forgotten');

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- **to withdraw your consent to the data processing** without affecting the lawfulness of processing, where your Personal Data has been collected and processed on the basis of your consent;
- **to object to the processing of your Personal Data**, where your Personal Data has been collected and processed on the basis of legitimate interests of Abivax;
- **to request a limitation** of the data processing in the situations set forth by applicable law;

If you would like to exercise any of these rights, please contact us as described in the “How to Contact Us” section below and we will take necessary steps to respond as soon as possible.


You may also file a complaint before a competent data protection authority regarding the processing of your Personal Data. While we suggest that you contact us beforehand, if you wish to exercise this right, you should contact directly the competent data protection authority.

How to contact us?

Abivax welcomes any questions or comments you may have regarding this Policy or its implementation. Any such questions or comments should be submitted using the contact information below.

Contact

You can send any request pertaining to Abivax’s use of your Personal Data to our Data Protection Officer by sending an email to dpo@abivax.com or by mail at Abivax, DPO, 5 rue de la Baume, 75008 Paris, France.

<u>Name & Function</u> Prof. Hartmut EHRlich, CEO	<u>Date & Signature</u> 28/01/2020  Prof. Hartmut J. Ehrlich, M.D. Chief Executive Officer (CEO) ABIVAX
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