

INTEGRITY POLICY

Xbrane Biopharma AB

Xbrane Biopharma safeguards the privacy of its employees, customers, suppliers, shareholders and other stakeholders. Therefore, it is important that the personal data provided to the Company is handled in a transparent manner with the integrity of the stakeholders in focus.

In this privacy policy, which applies to anyone who is in any way in contact with Xbrane Biopharma as an employee, job seeker, customer, supplier, shareholder or other stakeholder or otherwise in contact with the Company, describes how and why the Company processes personal data and what rights the individual has under applicable personal data legislation.

Unless otherwise specifically stated, it is Xbrane Biopharma AB, Org. No. 556749-2375, Retzius väg 8, 171 65 Solna, Sweden ("Xbrane", the "Company") responsible for the processing of personal data. The Xbrane Group includes Primm Pharma S.r.l., Reg. No. MI2075109, based in Milan, Italy.

1. What is personal data?

Personal data is any information that can be directly, or indirectly, attributed to a natural living person. Examples of this range from social security numbers to email addresses, but encrypted data can also constitute personal data if it can be linked to natural persons.

2. What is a "processing" of personal data?

The term "processing" is broad and covers most things you can do with a personal data. Everything from collection and storage to modification, use or deletion constitutes "processing".

3. What types of personal data does the Company come into contact with?

Xbrane is a biotech company whose customers and partners are other pharmaceutical companies, which means that the company primarily has B2B relationships. The personal data arising from this is identity data such as name and contact data such as e-mail address and telephone no. No such personal data is thus handled in the Company's customer relations.

The personal data primarily handled by the Company relates to employees, board members, senior executives, and their associates, those who have chosen to subscribe to the Company's newsletter, and shareholders or potential investors who have chosen to register for general meetings or investor meetings.

4. When does Xbrane collect personal data?

- Information that the person himself provides to the Company.

Xbrane collects and processes personal data that people provide to the Company, e.g. if you are employed by the Company, are a member of the Board of Directors or are related to employees in senior management, if you apply for a position in the Company, have inside information regarding the Company and are thus registered in a logbook, register for our newsletter, or are the contact person for a company that is the Company's customer, supplier or the like.

- Information from other sources

The company collects personal data on relatives of senior executives as this is a requirement under MAR (EU Market Abuse Regulation). This information was then provided from the person in senior management holding the related party relationship.

The Company also collects data on the 10 largest shareholders in the Company based on the share register. Such information includes name, address and number of shares. We do this in order to be able to present the ownership list in accordance with the stock exchange's regulations on the website and in financial statements.

5. Why do we process your personal data?

In order for the Company to fulfil its obligations as an employer, customer, supplier, etc., the Company must process certain personal data.

The company processes personal data mainly to:

- Administer salaries and other benefits to employees and board members.
- Inform and communicate with shareholders.
- Manage customer ledger and accounts payable.
- Follow the regulations that are primarily related to the Company being a publicly traded company.

See further information under paragraph 8.

6. What is the legal basis for processing personal data?

In order to process personal data, there must be a legal basis for this. The Company processes personal data on the following grounds:

- Since the processing of personal data is necessary for the Company to be able to fulfill an employment agreement – e.g. to administer payroll management and also personal training – and development plan for employees.
- Where the processing of personal data is necessary to fulfil a legal obligation e.g. accounting obligations or regulations and laws for listed companies.
- Since the Company has a legitimate interest in processing personal data e.g. in order to be able to send out newsletters to shareholders and other stakeholders.
- Where the processing of personal data is permitted because the person concerned has given such consent to it.

See further information under paragraph 8.

7. For how long does is the personal data saved?

Personal data is only processed for as long as it is necessary for the purposes for which it was collected - for example, as long as it is necessary for the Company to be able to fulfil the obligations that the Company has in connection with an agreement with the counterparty. The Company may save the data for longer if required by law or to protect its legal interests, e.g. if there is a legal process.

Personal data is deleted or anonymised when it is no longer relevant for the purposes for which it has been collected.

See further information under paragraph 8.

8. Compilation of the Company's personal data processing

For what purposes does the Company process personal data?	What legal basis does the Company have for the processing?	What categories of personal data are processed?	How long is data stored?
Administer newsletters	Legitimate interest	<ul style="list-style-type: none"> • Identity information: name • Contact details: e-mail and telephone number. 	Until the person unsubscribes from the newsletter
Administer salaries and other benefits as well as contact details for employees	Fulfilling agreements and enabling contact and communication	<ul style="list-style-type: none"> • Identity information: name, person no. • Contact details: e-mail and telephone no. • Sensitive personal data: salary and other allowances, bank account, tax table, absence due to illness, care of sick child or parental leave. 	Up to 2 years after termination of employment in addition to information that is affected by the Accounting Act and thus must be stored for 7 years.
Administer employee incentive programs and training plan	Performance of contracts and legitimate interest	<ul style="list-style-type: none"> • Identity information: name • Sensitive personal data: salary and other remuneration, shareholdings in the Company's shares and financial instruments, outcome of performance targets linked to incentive programs, CVs and training plan. 	Up to 2 years after termination of employment in addition to information that is affected by the Accounting Act and thus must be stored for 7 years.
Bilder taken by employees and possibly partners in the work environment for the purpose of	Legitimate interest.	<ul style="list-style-type: none"> • If applicable, name, title, company • Image 	As long as it is justified from a company historical perspective and as long as the images

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documenting company history and for use for editorial purposes as well as for marketing of the Company.			are up to date for use for the purpose of marketing the Company.
Contact information to the next of kin of the employee in case of an accident or similar occurs the employee	Legitimate interest.	<ul style="list-style-type: none"> • Identity information: name • Contact details: telephonenumber. 	Until employment
Presentation of the Board of Directors, management and advisory board on the Company's website, financial reports, presentations, etc.	Nasdaq OMX information requirements for issuers and legitimate interest.	<ul style="list-style-type: none"> • Identity information: name, year of birth • Function/Title or related party relationship • Image • Brief CV/Biography 	As long as it is justified from a company historical perspective
Comply with mar's (EU Regulation on market abuse) to draw up and keep up to date a list of senior executives and their associates.	MAR's (EU Market Abuse Regulation)	<ul style="list-style-type: none"> • Identity information: name, person no. • Contact details: telephonenumber, address, e-mail. • Title or related party relationship 	No time limit
Logbooks of persons possessing inside information regarding the Company	MAR's (EU Market Abuse Regulation)	<ul style="list-style-type: none"> • Identity information: name, person no. • Contact details: address, e-mail and telephone no. • Companies that the person may represent and its address, function/title. 	No time limit

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Implement and manage recruitment processes and incoming job applications.	Legitimate interest in managing the recruitment process.	<ul style="list-style-type: none"> • Name, address, telephone number and e-mail • Other information provided in the application such as title, experience, etc. 	As long as the recruitment process for the position is ongoing and as long as required by the current limitation requirements of the Discrimination Act. In the event that the Company wishes to save data for future recruitments, the Company will request consent.
Share register that forms the basis for which shareholders the Company has.	Swedish Companies Act, Nasdaq OMX information requirements for issuers	<ul style="list-style-type: none"> • Identity information e.g. shareholder name. • Contact details: address • Number of shares and votes 	No time limit
Registrations to General Meetings and Investor Meetings	Swedish Companies Act, Legitimate Interest	<ul style="list-style-type: none"> • Identity information such as name. • Contact information t.ex. e-post, telephone number, address • Number of shares and votes • Any food restrictions if indicated for ordering ingestion. 	As long as it is necessary to handle the request.
Manage existing and potential customer and partner relationships	Legitimate interest.	<ul style="list-style-type: none"> • Identity data e.g. names of contact persons at the companies. • Contact details, 	As long as it is necessary to manage the customer and

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		such as telephone numbers and e-mails to these contact persons	partner relationship.
Manage existing and potential vendors	Legitimate interest.	<ul style="list-style-type: none"> • Identity information e.g. names of contact persons at the companies. • Contact details, such as telephone numbers and e-mails to these contact persons 	As long as it is necessary to handle the Company's request for the counterparty's services and goods.

9. Profiling

Persons who are affected by the Company's personal data processing may object to the processing of personal data at any time through profiling. You do this by contacting us at dataskydd@xbrane.com.

10. Who may we share your information with?

The Company may share personal data with the subsidiary company Primm Pharma, Reg. No. MI2075109. This could then, for example, apply to contact details of contact persons at companies that Xbrane has or may initiate customer and partner relationships with or use as suppliers. This can also be done for information about employees related to incentive programs that are handled at group level. Information exchange between group companies can also take place in recruitment processes.

The company receiving the data are personal dataprocessors for the processing of personal data which it performs for these purposes.

The Company may share personal data with companies and suppliers that provide services for us e.g. to handle mailings or provide IT systems. These companies may only processthe personal data according to our instructions and may not use the data for their own purposes.

The company may also share personal data if it complies with law or government regulations, for example if the Company is obliged to disclose information to the Swedish Tax Agency for accounting reasons or to the Swedish Social Insurance Agency.

The Company may also share the information with the Company's auditor.

11. Where is data processed?

As a starting point, the stored personal data is processed within the EU. In the event that the Company uses service providers that transfer personal data to countries outside the EU and EEA, the Company will take measures to protect the personal data in accordance with applicable legal requirements, for example by requiring guarantees that the provider protects the data in accordance with applicable data protection rules. If persons affected by the Company's personal data processing want to know more about the safeguards we have taken, please contact the Company.

12. Rights for persons where personal data is stored by the Company

Rectification and access to personal data

As a data subject, the person concerned has the right to request rectification of incorrect data at any time or to change the personal data provided by them.

The person concerned also has the right to know what personal data the Company has registered about him. This is done by requesting a so-called registry extract.

Withdraw consent with future effect

If the Company processes the personal data of the person concerned on the legal basis consent, the person concerned has the right to withdraw his or her continued consent regarding future processing at any time.

Oppose treatment

The person concerned has the right to oppose the processing carried out by the Company on the basis of a balancing of interests.

The person concerned may at any time decline any communication mailings (this concerns persons who have signed up for newsletters). Deregistering can be done by clicking on a link in the current mailing or contacting the Company se contact details below).

Deletion of data

In certain circumstances, the person concerned has the right to have his or her personal data deleted. However, this does not apply if, for example, the Company is required by law to retain the data.

Restriction of processing

The party concerned may also have the right to request that the processing of personal data be restricted. However, if the person concerned requests that the processing of such data be restricted, it may result in the Company not being able to fulfil our possible obligations to the person during the period of limited processing. One such example could be if a subscriber to the newsletter only wants to receive a certain type of mailing.

Data portability

In the event that the interested party wishes to move such data from the Company, it also has the right to receive a copy of the personal data relating to the individual collected in a structured, machine-readable format (right to data portability). This right only covers information that the person himself has shared with the Company.

13. Complaints about our processing of your personal data

Should anyone be dissatisfied with the Company's way of processing their personal data, the Company primarily refers to dataskydd@xbrane.com.

If the person is not satisfied with the Company's handling of its complaint, she or he can lodge a complaint with the competent supervisory authority, The National Security Agency, www.imy.se.

14. Contact details of the data controller

Martin Åmark, CEO, Xbrane Biopharma AB, Org. No, 556749-2375, Retzius väg 8, 171 65 Solna, Tel: +46 (0)76-03467 33, is the data controller and is thus responsible for Xbrane Biopharma's processing of personal data.

In case of questions about data protection or whether to exercise the right as described above, the Company can most easily reach: dataskydd@xbrane.com

Changes to the Privacy Policy

The Company reserves the right to make changes to its privacy policy. The latest version can be found on the Company's website. In the event of updates that are critical to the Company's processing of personal data (e.g. change of stated purposes), this will be communicated to interested parties.