



PRIVACY POLICY

Updated August 2019

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Introduction

VenatoRx Pharmaceuticals, Inc. (VenatoRx” or “the Company”) is a pharmaceutical company dedicated to the discovery and development of novel anti-infective agents.

VenatoRx does not directly collect personal data. The Company does not have customers and/or product users. However, VenatoRx does engage in clinical research studies during which personal data will be collected by third parties. As such, VenatoRx may be considered a “Controller” of data under the European Union’s General Data Protection Regulation (GDPR) and our relevant third party the “Processor” of data.

As a “Controller” of personal data, VenatoRx is committed to protecting the privacy and security of personal information. VenatoRx takes care to protect the privacy of subjects who choose to participate in the Company’s clinical research studies. VenatoRx has therefore developed this privacy policy to inform you of the data the Company collects, what the Company does with your information, what the Company does to keep your information secure, as well as the rights and choices you have over your personal information.

Throughout this document, the Company refers to Data Protection Legislation, which means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

Definitions

Personal Data

‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing

‘processing’ means any operation or set of operations which is performed on personal data, or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Pseudonymization

‘pseudonymization’ means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Controller

'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processor

'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Third Party

'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Consent

'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Personal Data Breach

'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Data Concerning Health

'data concerning health' means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

Study Sponsor

'Study Sponsor' means a person, company, institution, group, or organization that oversees a clinical trial and collects and analyzes the data. 'Study Sponsor' may also be called 'trial sponsor'.

Clinical Research Organization (CRO)

'Clinical Research Organization (CRO)' means a company or organization that helps to conduct plan and execute a clinical study on behalf of the Sponsor.

The Information VenatoRx Collects and When

Over the course of the clinical research study, only information that VenatoRx knows the Company will genuinely use, and in accordance with the Data Protection Legislation, will be collected. VenatoRx, as the data Controller and study Sponsor, will not collect, store, or have access to any personal data during the course of the clinical research study. Personal data collection and storage will be performed by a study Contract Research Organization (Processor) and provided to VenatoRx through pseudonymization for purposes of analysis.

The type of information that the CRO will collect on you, and you voluntarily provide as part of the clinical research study enrolment process includes:

- Your name
- Date of Birth
- Address
- Telephone number(s)
- Medical history and data concerning health
- Reporting of any Severe Adverse Events

Collection of personal data is based on your consent as provided in the clinical study Informed Consent Form. Study personnel may contact you to ask that you come in for follow-up.

How VenatoRx Uses Your Information

- To make sure that the study is being conducted correctly and accurately;
- For the purposes of scientific testing;
- For future research; and/or
- For reasons related to publishing the results in a medical journal.

Who VenatoRx Might Share Your Information With

VenatoRx may share your personal data with other organizations in the following circumstances:

- If the law or a public authority says the Company must share the personal data; and/or
- If the Company needs to share personal data in order to establish, exercise or defend its legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk).

From time to time, the Company may employ the services of other parties for dealing with certain processes necessary for the operation of its website (www.venatorx.com). However, all the information the Company shares will be collected and anonymized, so neither you nor any of your devices can be identified from it.

Your Rights over Your Information

Right to Access Your Personal Information

You have the right to access the personal information that VenatoRx holds about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If the Company agrees that it is obliged to provide personal information to you (or someone else on your behalf), the Company will provide it to you, or them, free of charge and aim to do so within 30 days from when your identity has been confirmed.

VenatoRx will ask for proof of identity and sufficient information about your interactions with the Company so that it can locate your personal information.

If you would like to exercise this right, please contact the Company as set out below. Since VenatoRx only has access to pseudonymized data, such a request will be passed to the Company's processor/study doctor at the relevant site. If you wish to make a request directly with the processor/study doctor, their contact details can be found on the informed consent form.

Right to Correction Your Personal Information

If any of the personal information the Company holds about you is inaccurate or out of date, you may ask the Company to correct it. If you would like to exercise this right, please contact VenatoRx as set out below. Since VenatoRx only has access to pseudonymized data, such a request will be passed to the Company's processor/study doctor at the relevant site. If you wish to make a request directly with the processor/study doctor, their contact details can be found on the informed consent form.

If you would like to exercise this right, please contact the Company as set out below.

Right to Stop or Limit VenatoRx Processing of Your Data

You have the right to object to VenatoRx processing your personal information if the Company is not entitled to use it anymore; to have your information deleted if the Company is keeping it too long; or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact the Company as set out below.

For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the United Kingdom. The ICO makes a lot of information accessible to consumers on its website: ico.org.uk/for-the-public.

You can make a complaint to the Supervisory Authority in your country at any time about the way VenatoRx uses your information. However, VenatoRx hopes that you would consider raising any issue or complaint you have with the Company first. Your satisfaction is extremely important to VenatoRx, and the Company will always do its very best to solve any problems you may have.

How Long VenatoRx Keeps Your Information For

Your personal information will be retained in accordance with the Data Protection Legislation and never longer than is necessary. Unless otherwise required by law, your data will be stored as per the regulatory requirements, which is currently set at up to 25 years at which point it will be deleted.

Security

Data security is of great importance to VenatoRx, and to protect your data, the Company has put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

VenatoRx takes security measures to protect your information including:

- Limiting access to its buildings to those that the Company believes are entitled to be there (by use of passes, key card access and other related technologies);
- Implementing access controls to the Company's information technology;

- Using appropriate procedures and technical security measures (including strict encryption, pseudonymization and archiving techniques as appropriate) to safeguard your information; use of Data Loss Prevention policies in our cloud communications infrastructure to monitor and automatically protect sensitive information.

How to Contact VenatoRx

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact VenatoRx by one of the following means:

By email: contact@venatorx.com

By post: VenatoRx Pharmaceuticals, Inc., 74 E Swedesford Road, Suite 100, Malvern, Pennsylvania 19355 USA

For EEA Residents:

Please contact our EU Representative at:

By email: eurep@venatorx.com

By post: DPO Centre, 50 Liverpool Street, London, EC2M 7PR

By phone: +44 203 797 6340

www.dpocentre.com

Thank you for taking the time to read our Privacy Policy.

VenatoRx Pharmaceuticals, Inc.

This Policy was last updated on August 1, 2019.