

Sirius Therapeutics - Employee Privacy Notice

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Introduction

Sirius Therapeutics, Inc. ("Sirius", "We", "Our" or "Us") is committed to protecting the privacy and security of your Personal Data.

This privacy notice applies to all current and former employees and contractors of Sirius Therapeutics who are located within the European Union (EU), European Economic Area (EEA), or United Kingdom (UK).

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information.

Personal Data means any information or piece of information which could identify you either directly (e.g. your name) or indirectly (e.g. a unique ID number).

If anything in this Privacy Notice conflicts with local law in your jurisdiction, local law prevails.

The controller of your Personal Data

As your employer, Sirius Therapeutics are the Data Controller for the Personal Data that we process about you. We collect and use Personal Data about you during and after your working relationship with us, in accordance with Data Protection Legislation.

Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, the Data Protection Legislation means the General Data Protection Regulation (Regulation (EU) 2016/679) ('EU GDPR'). This includes any replacement legislation coming into effect from time to time. Depending on your location, additional legislation might also apply.

In the UK, Data Protection Legislation means the Data Protection Act 2018 ('DPA 2018'), United Kingdom General Data Protection Regulation ('UK GDPR'), the Privacy and Electronic Communications (EC Directive) Regulations 2003 ('PECR') and any legislation implemented in connection with the legislation mentioned above.

We have appointed a Data Protection Officer (DPO) to help us monitor internal compliance, inform and advise on data protection obligations, and act as a point of contact for data subjects and supervisory authorities. We have also designated an EU GDPR representative. To locate the relevant contact details, please see the Contact Us section below.

The Personal Data we collect about you

Personal Data Category	Personal Data
Basic information	Your name (including prefix or title), gender, civil status, age and date of birth
Contact information	Any information you provide to us that allows us to contact you, e.g. your personal or business email address, personal or business mailing address, personal or business telephone numbers, emergency contact information

National identifiers	Your national ID, passport details, driving licence details, residency and work permit status, national insurance number, or other taxpayer/government identification number
Employment information	Information relevant to your past and current positions in Sirius Therapeutics, e.g., title, salary plan, pay grade or level, unit/department, location, supervisor(s) and subordinate(s), working time records (including vacation and other absence records, leave status, hours worked), personnel file details, employee and/or network identification number, employment status, employment contract, retirement eligibility, educational and professional qualifications (including certificates, training records, etc.), promotions and disciplinary records
Financial information	Any financial information e.g. your salary, pension, stock options, stock grants and other awards, effective date of current compensation, salary reviews, bank details and bank account number, retirement account information, company allowances, bonus, benefits, insurance details
Dependant information	Information related to your dependants, e.g. the first and last names, dates of birth, and contact details of your spouse/partner, children, next of kin, emergency contacts, beneficiaries, and any other dependants
Expenses information	Information included in your expense reports and information needed by Sirius Therapeutics to process such reports according to its policies, e.g. places you have been to for business, invoices, car licence plate number
Talent management information	Performance, talent and development information e.g. details on performance management ratings and performance appraisals, training attendance and progress, development plan and willingness to relocate
Audiovisual recordings	We may collect photographs, video and audio recordings of you, e.g., recording videoconference meetings, or when you upload or share your photographs and videos for operational purposes
Infrastructure interactions	Information generated by Sirius Therapeutics to enable the use of our IT assets, products, systems, networks and communication channels. Information related to your use of our IT assets, products, systems, network services and communication channels, such as laptops, desktops, tablets and mobiles issued by us, Internet/Website use and access, corporate email, or provided tools or applications
Opinions	Information you provide when you participate in our surveys or conversation channels
Special Category Personal Data	Information related to your: <ul style="list-style-type: none"> • race and ethnicity • religious or philosophical beliefs • biometric data • health • sexual orientation
Criminal Convictions and Offences Data	Information related to your unspent criminal convictions and offences.

If you give us the Personal Data of another person, e.g. your spouse/partner dependants or beneficiaries, we assume you have their permission to share their data with us.

We will process Personal Data (including any of the information listed above) only where the law allows us to do so.

How we collect your Personal Data

We collect your Personal Data when you:

- Apply for a job in Sirius Therapeutics and participate in our recruitment process;
- Interact with our Human Resources team;
- Take part in our business operations;
- Take part in business processes such as performance reviews, succession planning, talent management, health and safety wellbeing, inclusion and diversity, learning and development, or use our employee assistance programmes;
- Use our IT assets, products, systems, networks and communication channels;
- Respond to surveys; and
- Otherwise provide it to us.

We will also collect your information through:

- Healthcare providers;
- Background check providers;
- Social media platforms (such as LinkedIn) or other publicly available sources.

How we use your Personal Data

Personal Data Category	Lawful Basis	Purpose
<ul style="list-style-type: none"> • Basic information • Contact information • Employment information • National identifiers • Financial information • Talent management information • Audiovisual recordings • Infrastructure interactions • Opinions • Criminal Convictions and Offences data 	<p>Our Legitimate Interest in recruiting talent</p> <p><i>GDPR, Article 6(1)(f)</i></p>	<p>Recruitment</p> <p>For recruitment purposes, including, but not limited to: suitability reviews (applications, CVs, interviews); maintaining recruitment records; screening, background checks, credit checks, and criminal record checks; and, sourcing references, where applicable.</p>
<ul style="list-style-type: none"> • Basic 	Contractual	Successful Recruitment

<ul style="list-style-type: none"> information • Contact information • Employment information • National identifiers • Financial information • Infrastructure interactions • Special Category Personal Data (health) 	Obligation <i>GDPR, Article 6(1)(b)</i>	<p>For successful recruitment purposes, including, but not limited to: verification of identification documentation; collecting personal, financial, and health information to prepare for your forthcoming employment.</p>
<ul style="list-style-type: none"> • Basic information • Contact information • Employment information • Financial information • Audiovisual recordings • Infrastructure interactions 	Contractual Obligation <i>GDPR, Article 6(1)(b)</i>	Employment Management <p>Managing your employment at Sirius Therapeutics, including but not limited to: paying your salary; providing bonuses, company vehicles, childcare vouchers, and other benefits; paying your business expenses; managing healthcare insurance and life insurance; making available direct healthcare or occupational health services; managing pensions; managing leave, including employee leave, sickness absence, parental leave, and other leave as required; managing membership in employee assistance programs; managing employee relations; disciplinary matters and terminations; and, managing post-employment records and activities, (e.g., provision of references).</p>
<ul style="list-style-type: none"> • Basic information • Contact information • Employment information • Financial information • Audiovisual recordings • Infrastructure interactions • Special Category Personal Data (biometric data) 	Our Legitimate Interests in running our business <i>GDPR, Article 6(1)(f)</i>	Business Operations <p>For the purposes of Sirius Therapeutics operations, including, but not limited to: managing and allocating company assets and human resources; strategic planning and project management; audits; maintaining records relating to business activities; and, re-organisations, mergers and acquisitions.</p>
<ul style="list-style-type: none"> • Basic information • Contact information • Special Category Personal Data (biometric data) 	Contractual Obligation <i>GDPR, Article 6(1)(b)</i>	Communication <p>Communicating with you and facilitate your communication with others.</p>

<ul style="list-style-type: none"> • Basic information • Contact information • Dependant information • Special Category Personal Data (health) 	Vital Interest <i>GDPR, Article 6(1)(d)</i>	Emergency Communication <p>Communicating with your dependants in case of personal emergency, or when necessary to protect the health and safety of you and others.</p>
<ul style="list-style-type: none"> • Basic information • Contact information • Employment information • Financial information • Talent management information • Infrastructure interactions • Opinions 	Our Legitimate Interest in developing our workforce <i>GDPR, Article 6(1)(f)</i>	Professional Development <p>For the purposes of professional development, including, but not limited to: managing training, development, education or coaching or other forms of career guidance or personal development; managing performance, evaluations, promotions and succession planning; and, analysing and evaluating perceptions of organisational culture, performance, leadership and change initiatives.</p>
<ul style="list-style-type: none"> • Basic information • National identifiers • Employment information • Financial information • Expenses information • Special Category Personal Data (health) 	Legal Obligation <i>GDPR, Article 6(1)(c)</i>	Legal Obligations <p>For the purposes of complying with legal, regulatory and other requirements, including, but not limited to: checking Right to Work documentation; reviewing vehicular insurance and associated documentation; complying with local employment, social security and occupational health laws and regulations; making income tax and national insurance deductions; record-keeping and reporting obligations; data protection exercises; and, complying with government inspections and other requests from government or other public authorities.</p>
<ul style="list-style-type: none"> • Basic information • Contact information • Employment information • Audiovisual recordings • Infrastructure interactions 	Our Legitimate Interest in maintaining a secure work environment <i>GDPR, Article 6(1)(f)</i>	Security and Monitoring <p>Monitoring your activities in order to maintain a secure work environment, including, but not limited to: monitoring audiovisual recordings via CCTV or similar systems; monitoring your use of computer applications, internet browsing history, email, or mobile phone actions; providing you with access to Sirius Therapeutics sites and monitoring your site access; and, monitoring your use of other company resources, including our IT assets, products, systems, networks and communication channels.</p>
<ul style="list-style-type: none"> • Basic information • Contact information • Infrastructure interactions 	Consent <i>GDPR, Article 6(1)(a)</i>	User Authentication <p>We may process your biometric data (e.g., fingerprint data) for the purposes of authenticating your identity on Sirius Therapeutics devices. Please note that Sirius Therapeutics does not receive your biometric data, and it</p>

<ul style="list-style-type: none"> • Biometric data 		will always remain encrypted at rest and stored on-device. Where we do so, you are under no obligation to provide your biometric data for this purpose; you can elect to instead use more traditional sign-in methods (passwords, PIN numbers, etc.). As such, you explicitly consent to the processing of your biometric data for user authentication purposes when you configure biometric sign-on functionality within the relevant device, programme or application. You can withdraw your consent at any time by updating your configuration settings accordingly.
<ul style="list-style-type: none"> • Basic information • Contact information • Dependant information • Special Category Personal Data (health) 	Vital Interest <i>GDPR, Article 6(1)(d)</i>	Vital Interest Monitor your health in order to safeguard and protect you, or to act in your vital interest, or the vital interest of a third party.
<ul style="list-style-type: none"> • Basic information • Employment information • Audiovisual recordings • Opinions 	Our Legitimate Interest in advertising our business <i>GDPR, Article 6(1)(f)</i>	Marketing and Advertising For marketing and advertising purposes, including, but not limited to: producing audiovisual recordings of you and publicising them on various distribution channels, including websites, social media, and other platforms; and, publicising your opinions of our business.
<ul style="list-style-type: none"> • Basic information • Contact information • Employment information 	Our Legitimate Interest in identifying areas for improvement or unlawful activity <i>GDPR, Article 6(1)(f)</i>	Whistleblowing For whistleblowing purposes, including, but not limited to: making available processes and systems that enable employees to identify and escalate concerns to management and/or Human Resources, and taking appropriate steps to investigate or address raised concerns.
<ul style="list-style-type: none"> • Basic information • Special Category Personal Data (Ethnicity, Religious or Philosophical Beliefs, Health data, Sexual Orientation) 	Public Interest <i>GDPR, Article 6(1)(e)</i>	Equal Opportunity Monitoring Where you are an employee of Sirius Therapeutics, we may use information about your ethnicity, religious or philosophical beliefs, health data (including any disabilities), or sexual orientation, for equal opportunity monitoring and reporting purposes. You can opt out of equal opportunity monitoring at any time by using the contact details provided in the Contact Us section below.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive Personal Data

Special Category Personal Data

Special Category Personal Data	Condition for Processing	Purpose
<ul style="list-style-type: none"> Health data 	Employment Law <i>GDPR, Article 9(2)(b)</i>	Reasonable Adjustments We may use information about your health or disability status to consider whether we need to provide reasonable adjustments to your working conditions (e.g., if you become pregnant).
<ul style="list-style-type: none"> Health data 	Employment Law <i>GDPR, Article 9(2)(b)</i>	Leave Records We may process your health data to maintain sickness absence records, parental leave records, and other relevant leave records as required by applicable employment law.
<ul style="list-style-type: none"> Health data 	Vital Interest <i>GDPR, Article 9(2)(c)</i>	Vital Interest To act in your vital interest, or the vital interest of a third party.
<ul style="list-style-type: none"> Biometric data 	Explicit Consent <i>GDPR, Article 9(2)(a)</i>	User Authentication We may process your biometric data (e.g., fingerprint data) for the purposes of authenticating your identity on Sirius Therapeutics devices. Please note that Sirius Therapeutics does not receive your biometric data, and it will always remain encrypted at rest and stored on-device. Where we do so, you are under no obligation to provide your biometric data for this purpose; you can elect to instead use more traditional sign-in methods (passwords, PIN numbers, etc.). As such, you explicitly consent to the processing of your biometric data for user authentication purposes when you configure biometric sign-on functionality within the relevant device, programme or application. You can withdraw your consent at any time by updating your configuration settings accordingly.
<ul style="list-style-type: none"> Ethnicity Religious or Philosophical Beliefs Health data 	Substantial Public Interest <i>GDPR, Article 9(2)(g)</i>	Equal Opportunity Monitoring Where you are an employee of Sirius Therapeutics, we may use information about your ethnicity, religious or philosophical beliefs, health data (including any disabilities), or sexual

<ul style="list-style-type: none"> Sexual Orientation 		orientation, for equal opportunity monitoring and reporting purposes. You can opt out of equal opportunity monitoring at any time by using the contact details provided in the Contact Us section below.
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Criminal convictions and offences data

Depending on the jurisdiction in which you operate and on your specific role, we may collect information about your criminal convictions and offences. We do this to satisfy ourselves that there is nothing in your criminal convictions and offences history which makes you unsuitable for the role. Our roles require a high degree of trust and integrity, and it is therefore best practice to undertake such checks and a pre-requisite in some instances.

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

We have in place appropriate policies and safeguards which we are required by law to maintain when processing such data.

Automated decision making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

How long we keep your Personal Data

We will keep your Personal Data only for as long as necessary in order to complete the activities we have explained in this Privacy Notice.

In general, we will retain your Personal Data for the duration of your employment plus an additional six years.

We may also retain your Personal Data for longer period where we need to exercise, establish, or defend against legal claims.

The recipients of your Personal Data

We share your Personal Data on a need-to-know basis, and to the extent necessary to follow laws and regulations, and to manage your employment relationship with us.

Sirius Therapeutics might share your Personal Data with:

- Your manager and appropriate levels of your management chain;
- Human Resources and other departments throughout the company; and,
- Affiliate or partner companies, or strategic collaborators.

From time to time, we may also need to make your Personal Data available to external organisations, such as:

- Regulatory or government and law enforcement authorities;

- Professional advisors, such as auditors, accountants and lawyers; and
- Companies that provide products and services to us (such as payroll, agencies for recruitment and screening activities, pension scheme, insurance or medical benefits providers, IT systems suppliers and support, and other third parties engaged to assist us in carrying out business activities).

International transfers of your Personal Data

Sirius Therapeutics uses service providers in multiple countries. Therefore, we may need to transfer and use your Personal Data outside of the country where we collect it from you. We implement appropriate measures to protect your Personal Data when we transfer your Personal Data outside of your home country. This includes appointment of our EU GDPR Representative to handle local data queries, as well as having appropriate agreements in place to protect your data, such as data transfer agreements that incorporate standard data protection clauses. You can request a copy of the standard data protection clauses we use from our DPO using the contact details in the Contact Us section below.

How we protect your Personal Data

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. If you would like additional assurances regarding how we process data securely, please contact us as set out below.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your rights regarding your Personal Data

You have rights we need to make you aware of. The rights available to you depend on our reason for processing your Personal Data and the local law in your jurisdiction. Depending on this you may have the right to:

- Ask us for copies of your Personal Data. There are some exceptions, which means you may not always receive all the information we process;
- Ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- Ask us to delete your Personal Data, in certain circumstances;
- Ask us to restrict the processing of your information;
- Object to our processing of your Personal Data;
- Ask that we transfer information you have given us from one organisation to another, or to give it to you;
- Withdraw your consent, where you have previously provided it to us; and
- Complain to your local data protection authority.

To exercise any of these rights, you can contact us using the information in the Contact Us section below.

For your protection, and to protect the privacy of others, we may need to verify your identity before completing what you have asked us to do.

If you object to us using your Personal Data or withdraw consent for us to use your Personal Data (when we are processing your Personal Data based on your consent), after initially giving it to us, we will respect your choice in line with applicable law.

If you are in the UK, you have the right to lodge a complaint at any time to the Information Commissioner's Office (ICO) <https://ico.org.uk/>, the UK supervisory authority for data protection.

If you are in the EU or EEA, you also have the right to lodge a complaint at any time with the relevant supervisory authority responsible for data protection. For a list of the relevant supervisory authorities, please see https://www.edpb.europa.eu/about-edpb/about-edpb/members_en

Updates to this Privacy Notice

We may change this privacy notice from time to time (for example, if the law changes). Any changes become effective when we publish an update to this policy. If there are significant changes, we may contact you to notify of the update. We recommend that you check this notice regularly to keep up-to-date.

Contact Us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this notice, the way your Personal Data is processed, or the wider data protection practices of Sirius Therapeutics, please contact us by one of the following means:

Our Data Protection Officer (DPO): dpo@siriusrna.com

Our EU GDPR Representative: The DPO Centre Europe Limited, EUrep@siriusrna.com

Thank you for taking time to read this privacy notice.