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Privacy Policy

Updated: Jun 06, 2025

1 Introduction

Sirius Therapeutics, Inc. (referred to as "Sirius", "we", "our" or "us"); is a clinical stage biopharmaceutical company and clinical trial sponsor. Our registered address is 11760 Sorrento Valley Road, San Diego, California 92121, USA.

We respect your privacy concerns and value your relations with us. This Privacy Policy is intended to explain the types of personal information we will collect, how we will use it, how we will share it, and your options. We will also explain our information security measures and how you can contact us about our privacy policy.

This Privacy Policy applies to the following individuals:

- Users of this website (Site) - <https://www.siriusrna.com/>
- Clinical trial participants
- Healthcare professionals (HCP) involved in clinical trials
- Sirius Therapeutics personnel (employees and contractors)
- Other persons involved in commercial operations (suppliers, strategic partners, shareholders/investors, etc).

2 Definitions

For the purpose of this Privacy Policy, the following terms and definitions apply:

Term	Definition
Data Controller	for the purposes of both UK and EU GDPR, refers to the legal entity, which alone or jointly with others, determines the purposes and means of the processing of Personal Data. For the purpose of both UK and EU GDPR, Sirius is the Data Controller of your Personal Data.
Data Processor	for the purposes of both UK and EU GDPR, refers to Sirius' Service Providers.
Data Protection Legislation	Applicable national, federal, state, regional and international laws, statutes, decrees, directives, declarations, legislative enactments, regulations, orders, court rulings and binding industry codes of practice; relating to the protection of individuals' privacy or the processing of Personal Data that are applicable to Sirius' Service.



GDPR	The General Data Protection Regulation
Personal Information / Data	means any information that relates to an identified or identifiable individual. This may include your name, date of birth/age, gender, racial or ethnic origin, contact details (mailing address/telephone number/email address), identification number, online identifier - or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.
Service	means any services provided by Sirius, including provision of the Site, clinical trials, business-to-business dealings and handling of enquiries.
Supplier	means any natural or legal person who processes the data on behalf of Sirius. It refers to third-party companies, Investigator Sites, or individuals employed by Sirius to provide a Service on behalf of Sirius. For the purpose of both UK and EU GDPR, Suppliers are considered Data Processors.
Strategic Partner	means any entity that has entered into a collaborative agreement with Sirius with the aim to share skills, information and/or other resources.
Usage Data	refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
Site	refers to the Sirius' website (https://www.siriusrna.com/).

3 Data Protection Legislation

- European Union (EU) and European Economic Area (EEA)
In the EU and EEA, Data Protection Legislation means the General Data Protection Regulation (Regulation (EU) 2016/679) ('EU GDPR'), the ePrivacy Directive (Directive 2002/58/EC), as well as any local data protection implementation laws, including any replacement legislation coming into effect from time to time.
- United Kingdom (UK)
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 aforementioned



legislation, including any replacement legislation coming into effect from time to time.

○ North America

In North America, Data Protection Legislation refers to any federal, state, sectoral, or case laws and regulations governing the privacy and security of personal information. This includes applicable state privacy legislation, including, but not limited to, the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), New York's Shield Act and Delaware's Online Privacy and Protection Act (DOPPA), as well as other relevant state and federal regulations. This definition also encompasses any legislation implemented under these laws and any replacement or additional legislation enacted from time to time.

○ Other Jurisdictions

Depending on your jurisdiction, additional Data Protection Legislation may apply. If you have any questions, you can contact our DPO using the details in the Contact Us section below.

4 Your Information

We collect and use personal information in a variety of ways depending on how you interact with us. This may include through you filling out a form on our Site, through your participation in one of our clinical trials (or through your partner, child, or parent's participation), through employment with us, or other commercial transaction. Personal information sources and types include:

Data Subject	Personal Information
Users of this Site	○ Name. ○ Personal contact details (mailing address/telephone number/email address). ○ Online identity and behaviour (e.g. IP address, browser type and version, pages viewed, time spent on pages, links clicked and conversion information).
Clinical Trial Participant	○ Name. ○ Date of birth / Age. ○ Gender. ○ Race and Ethnicity. ○ Personal contact details (mailing address/telephone number/email address). ○ Health information (including medical records, genetic data, and family history).



	○ Pseudonymized unique ID. ○ Where relevant: name, contact details, and health information of your partner or child. ○ Where relevant: name and contact details of your representative (e.g. parent, guardian, caregiver, or other legal agent). ○ Where relevant: financial information (e.g. bank details).
Healthcare Professional	○ Name. ○ Job title. ○ Business contact details (mailing address/telephone number/email address). ○ Where relevant: financial information (e.g. bank details).
Sirius Personnel (employee or contractor)	○ Name. ○ Date of birth / Age. ○ Gender. ○ Race and Ethnicity. ○ Personal contact details (mailing address/telephone number/email address). ○ Administration information (including nationality, right-to-work status - and pseudonymized ID such as payroll no., tax ID code). ○ Where relevant: financial information (e.g. bank details). ○ Where relevant: health information (including sick leave).
Other persons involved in commercial operations (Suppliers, Strategic Partners, shareholders/investors, etc).	○ Name. ○ Job title. ○ Personal and/or Business contact details (mailing address/telephone number/email address). ○ Where relevant: financial information (e.g. bank details).

5 How We Use Your Information

Sirius will only process your personal information when permitted by law. Your information will not be stored, process, or transferred unless we have a valid and lawful reason to do.

Processing Activity	Lawful Basis
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To monitor, provide, and maintain the services you select through this Site. and; To ensure the technical functions of our network.	Legitimate Interest in delivering services to you.
To respond to your questions, feedback, or complaints, and address any Data Subject Requests	Legitimate Interest in supporting you as a user.
To contact you, about news and information relating to our service through service messages, if you have provided your contact details and; To improve and customize the content and layout of the Site	Legitimate Interest in communicating about our services
To use Third Party (non-essential) tracking and sharing with others	Consent

6 Children's Privacy

While this Site is designed for a general audience, it is not designed, nor intended for children/minors. No one under the relevant country regional digital/online age of consent may provide personal information to or on the Site. If you are a child/minor, do not use or provide any information on this Site or on or through any of its features - and do not provide us with any information about yourself. Any personal information entered on behalf of a child/minor must be strictly provided by a parent or legal guardian.

If we learn we have collected or received personally identifiable information directly from a child/minor, we will delete that information. If you believe we might have collected personal information directly from a child/minor, please contact us at dpo@siriusrna.com.

Use of Digital Tracking Technologies

Our Site does not collect or use online tracking technologies such as Cookies, Web Beacons, Pixels, and Tags. Further, Sirius does not process IP addresses.

批注 [CA1]: We strongly recommend;

A. separating this out to a Cookies Policy (with different url on the site). We can then review further to align to the GDPR.
 B. Implementing a Cookies Banner (if intending to employ the use of cookies and other online tracking technologies).

批注 [CA2R1]: Struck out at request of E. Wang (2025-Jun-05 call).

批注 [CA3R1]: Modified at the request of E. Wang (2025-Jun-05 call).



8 How We Will Share Your Information

We share your personal information with third parties who provide services for us. Examples of these Data Processors include but are not limited to:

- Our Contract Research Organization (CRO);
- Our Clinical Trial Data Processors; and
- Our IT Service Providers, such as website hosting, website analytics etc.

We have Data Processing Agreements in place with our Data Processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organization apart from us, or further sub-processors unless they also comply with our Data Processing Agreement. They will hold your Personal Data securely and retain it in accordance with our instructions and only under the following circumstances:

- when we must provide your personal information as required by laws or regulations, or under the mandatory requirements of administrative enforcement or judicial actions;
- when we disclose your personal information designated by you, at your request, and in a way explicitly approved by you.

9 How Long We Keep Your Information

We retain a record of your personal information in order to provide you with a high quality and consistent service. Your information will always be handled in accordance with the Data Protection Legislation, and we will never retain it longer than is necessary.

Sirius follows a retention schedule which outlines how long we will retain your personal information. Sirius considers the retention period to begin from the point at which we last contacted you or otherwise reviewed your record to determine whether it was still active, unless otherwise required by law. As such, unless otherwise required by law, your data will be retained for the period specified in the summarized table below and then securely deleted in accordance with our internal policies and procedures.

Personal Information from	Retention Period
Users of this Site	1 year
Clinical trial participants	25 years following the conclusion of the clinical trial,



	as determined by EU Clinical Trial Regulations (EU-CTRs)
Healthcare professionals (HCP) involved in clinical trials	25 years following the conclusion of the clinical trial, as determined by EU Clinical Trial Regulations (EU-CTRs)
Sirius Therapeutics personnel (employees and contractors)	8 years following the termination of employment or contract
Other persons involved in commercial operations (suppliers, strategic partners, shareholders/investors, etc.)	6 years

10 Data Integrity & Security Of Your Information

Sirius takes all reasonable steps to ensure that the personal information collected from you is reliable for its intended use, accurate, complete, and current.

We use appropriate technical, administrative, and physical safeguards to protect your personal information from loss, misuse, or alteration. In addition, we take steps to ensure that our safeguards take into account new known threats. Of course, no organization can guarantee the absolute security of personally identifiable information. You should keep in mind that internet transmissions, particularly email transmissions, are never 100% secure or error-free. Accordingly, we also caution you to guard your own computer and password against unauthorized access by others.

Any detected breach of data security (accidental or unlawful access, disclosure or misuse of personal information) shall be reported without undue delay.

11 Transfer Of Your Information

We protect personal information entrusted to us no matter what country it is stored or transferred to – as described above in '*Data Integrity & Security Of Your Information*'.

At times (e.g. when Sirius shares clinical trial data with trusted Data Processors), we may be required to transfer personal information to countries other than the country where the information was provided. If you are based in the EU/EEA/UK in such instance, the transfer will be based on safeguards that allow us to conduct the transfer in accordance



with the Data Protection Legislation - such as specific contracts containing standard data protection clauses approved by the European Commission or Information Commissioner's Office 'ICO' (as relevant). You can obtain a copy of this documentation by contacting the EU Representative or DPO identified in the "Contact Us" section below.

12 Your Rights

Depending on your country/jurisdiction, by law you may have the right to:

- request a copy of your personal information which Sirius holds about you.
- be informed about the collection and use of your personal information. We ensure we do this with our Privacy Notices (including this document). These are regularly reviewed and updated to ensure they accurately reflect our processing activities.
- request that Sirius correct any personal information if it is found to be inaccurate or out of date;
- request your personal information be erased where it is no longer necessary for Sirius to retain such data;
- withdraw your consent to the processing of personal information to which you earlier provided consent for processing;
- request that Sirius provides you with an export of your personal information and where possible, to transmit that data directly to another data controller (known as the right to data portability);
- where there is a dispute in relation to the accuracy or processing of your personal information, to request a restriction be placed on further processing;
- object to the processing of personal information (where applicable); and
- lodge a complaint with a data supervisory authority.

You can contact us at any time via the ways provided in "Contact Us" below.

For security reasons, you may need to submit a written request or prove your identity in other ways. We may ask you to verify your identity first before processing your request. If you are not satisfied with the reply, you can also make a complaint to us via the ways provided in "Contact Us".

We will not be able to respond to your request under the following circumstances:

- the fulfilment of our legal obligations;
- national security or national defence security;
- public security, public health, or major public interests;
- criminal investigations, prosecutions, trials, or the execution of court rulings;



- where there is sufficient evidence to prove that you are ill-minded or abusing your rights;
- where we can't respond to your request for the sake of protecting your or other individuals' lives or properties or major legitimate rights and interests, but it is very difficult for us to get your consent for this;
- where responding to your request will cause serious damages to the legitimate rights and interests of yours or other individuals or organizations;
- business secrets.

13 External Links

This Site may contain links to various websites that Sirius does not control. When you click on one of these links, you will no longer be transacting business through the Site. Third party websites maintain their own privacy policies, and we do not exercise any control over any of the third party websites that may be linked to the Site. If you visit a website that is linked to the Site, you should consult that website's privacy policy before providing any personal information. Please be aware that we are not responsible for the privacy practices of such other websites, and we are not liable for their misuse of your personal information.

14 How To 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 Privacy Notice or the way your personal information is processed, please contact our appointed Data Protection Officer (DPO) by one of the following means:

- Address: The DPO Centre Ltd., 50 Liverpool Street, London, UK, EC2M 7PY
- Telephone: +44 (0) 203 797 1289
- Email: dpo@siriusrna.com
- EU Representative (The DPO Centre): email: EUREP@siriusrna.com

批注 [CA4]: Have these email addresses been confirmed?

批注 [CA5R4]: All confirmed,
- and struck out UKRep details at request of E. Wang
(2025-Jun-03 email).

15 How To Make A Complaint

In the event of a privacy related complaint, Sirius will investigate and attempt to promptly resolve any complaints and disputes regarding use and disclosure of personal information.

For complaints that cannot be resolved by Sirius, we commit to cooperating with the relevant regulatory bodies;

The DPO Centre GDPR compliance review of:
Sirius Therapeutics - website Privacy Notice



Individuals in the EU can choose to contact their national Data Protection Authority (DPA), or use the form at: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en#member-de.

Individuals in Switzerland can choose to contact the Swiss Federal Data Protection and Information Commissioner (FDPIC) at:
<https://www.edoeb.admin.ch/edoeb/de/home.html>.

Individuals in the UK can choose to contact the Information Commissioner's Office (ICO) at: Information Commissioner's Office (ICO)
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF
United Kingdom
Telephone: +44 (0) 303 123 1113
Web: <https://ico.org.uk/>

Independent dispute resolution processes are provided at no cost to the individual.

16 Changes to This Privacy Policy

This Privacy Policy may be updated from time to time, to reflect the changes in our services as well as Data Protection Legislation. We may release information or send notifications, to inform you of any major changes to the Privacy Policy, and indicate when the latest update was made at the top of the Privacy Policy. We encourage you to review our Privacy Policy periodically.

This Privacy Policy will become effective on **MMM DD, 2025**.