

Kronos Bio Privacy Notice for EU Clinical Site Personnel

Effective on: 25 October 2023

1. Introduction

Kronos Bio, Inc. (“**Kronos Bio**”, “**we**”, “**us**”, “**our**”) sponsors ethically approved clinical trials. We take the protection of personally identifiable information (“**Personal Data**”) very seriously.

2. Scope of this Notice

This Privacy Notice (the “**Notice**”) addresses health care providers and other clinical trial personnel (“**Data Subjects**”) who are located in the EU, and whose Personal Data we may receive in connection with their work on clinical trials (a “**Trial**” or the “**Trials**”) we sponsor.

This Notice does not apply to Personal Data collected by any other means or in other contexts, such as Personal Data collected through our public website, as well as the Personal Data of Kronos Bio’s employees, job applicants, contractors, business owners, officers, directors or staff. This Notice does not apply to Personal Data of individual patients involved in our Trials. If you would like to learn how we process Personal Data of individual patients participating in the Trials, please review the Privacy Notice located [here](#).

3. Controllership

Within the scope of this Notice, Kronos Bio acts as a data controller for the Personal Data processed in the context of the Trials we sponsor. This means that we alone determine the purpose and means of the processing of your Personal Data in connection with the Trials.

In some jurisdictions, we are considered a “joint controller” with another organization, such as the study site where the Trial is being conducted. This means that we jointly, together with the other organization, determine the purpose and means of the processing of your Personal Data.

4. Categories of Personal Data

We may process the following types of your Personal Data in the context of our Trials:

- identifying information, such as your first and last name;
- contact information, such as your phone number, physical address and email address;
- professional and employment related information, such as your qualifications and job titles; and
- any other information that you present us with as part of your qualifications and responsibilities related to the fulfilment of the role, including as contained in your résumé or curriculum vitae.

5. How We Receive Personal Data

- You provide it directly to us (including when you provide your Personal Data to one of our service providers acting on our behalf);
- we receive it from the clinical research organization that conducts the Trial on our behalf;
- you visit one of our Trial-specific websites or online portals; and/or
- you provide it to us, or the clinical research organization, when you complete a pre-screening questionnaire to confirm your eligibility to participate in the Trial.

6. Purpose of Processing

We may use your Personal Data to:

- confirm your qualifications and experience. We do this in order to comply with the suitability requirements for individuals conducting Trials in terms of clinical trials legislation;
- communicate about the status of the Trial;
- manage and facilitate the Trial; and
- comply with applicable laws or regulations governing Trials.

7. Basis of Processing

We may process your Personal Data on the basis of:

- **Consent:** We may ask for your consent to collect and process your Personal Data.
- **Contract:** We may process your Personal Data to fulfill a contract we have with you.
- **Legitimate Interests:** We may process your Personal Data based on our legitimate interests in facilitating and managing Trials.
- **Compliance with Legal Obligations:** We may need to process your Personal Data in order to comply with applicable laws or regulations, such as the laws regulating the safety and reliability of our Trials.

Where we process your Personal Data based on your consent, you may withdraw it at any time. However, this will not affect the lawfulness of our processing before you withdrew your consent. It will also not affect processing performed on other lawful grounds. If you withdraw your consent, you may be ineligible to work on the Trial.

Where we receive your Personal Data as part of a contract we may have with you, we require such Personal Data to be able to carry out the contract. Without that necessary Personal Data, we will not be able to fulfill our contractual obligation towards you.

Where we process Personal Data on the basis of our legitimate interests, we will always do so after a careful assessment which requires balancing your right to privacy and our legitimate interests.

8. Data Retention

We will retain your Personal Data until we fulfill the purposes listed above, or for as long as required to comply with applicable laws or regulations.

9. Sharing Personal Data With Third Parties

We may share Personal Data with our service providers who process Personal Data on our behalf, and who agree to use the Personal Data only to assist us in fulfilling the purposes of processing as described in Section 6 above, or as required by law. Our service providers include parties providing:

- contract/clinical research organization services;
- data storage and archiving software and related services; and
- data analytics and reporting software and services.

10. International Transfers of Personal Data

The GDPR only allows us to transfer Personal Data outside of the European Union (“EU”) or the European Economic Area (“EEA”) if the country that the data is being transferred to offers an adequate level of protection for the Personal Data which is equivalent to EU law. Kronos Bio is situated in the United States of America (“USA”), outside the EU/EEA. We have implemented various safeguards to protect Personal Data, which enables us to receive EU Personal Data in the USA.

Some of our third party service providers described above may also be located in countries outside of the EU/EEA. In some cases, the European Commission may have determined that the laws of certain countries provide an adequate level of protection to Personal Data. You can see [here](#) the list of countries that the European Commission has recognized as providing an adequate level of protection to Personal Data.

For transfers of Personal Data to third countries which are not recognized as providing an adequate level of protection, we will only transfer EU Personal Data to third parties in those countries when there are appropriate safeguards in place. These safeguards may include the [Standard Contractual Clauses](#) as approved by the European Commission under [Article 46.2 of the GDPR](#).

11. Other Disclosure of Your Personal Data

We may disclose your Personal Data:

- to regulators or competent authorities, to the extent necessary to comply with applicable laws, regulations, and rules (including, without limitation, federal, state, or local laws);
- to the extent required by law, or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings (whether initiated by governmental/law enforcement officials or private parties);
- if, in the future, we sell or transfer, or consider selling or transferring, part or all of our company, business, shares, or assets to a third party, and we disclose your Personal Data to such third party in connection with the sale or transfer; or
- if we are acquired by, or merged with, a third-party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose, or assign your Personal Data in connection with the foregoing events.

If we have to disclose your Personal Data to governmental or law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your Personal Data.

12. Data Integrity and Security

We have implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect Personal Data from unauthorized processing. This includes unauthorized access, disclosure, alteration, or destruction.

13. Your Privacy Rights

Right to Know What Happens to Your Personal Data

This is otherwise known as the “right to be informed”. It means that you have the right to obtain from us all information regarding our data processing activities that concern you, such as how we collect and use your Personal Data, how long we will keep it, and who it will be shared with, among other things.

We are informing you of how we process your Personal Data with this Notice.

Right to Know What Personal Data We Have About You

This is otherwise known as the “right of access”. This right allows you to ask for full details of the Personal Data we hold about you. Once we receive and confirm that the request came from you, we will disclose the information we have about you.

Under some circumstances, we may deny your access request. In that event, we will respond to you with the reason for the denial.

Right to Change Your Personal Data

This is otherwise known as the “right to rectification”. It gives you the right to ask us to correct anything that you think is wrong with the Personal Data we have on file about you, and to complete any incomplete Personal Data.

Right to Delete Your Personal Data

This is otherwise known as the “right to erasure”, “right to deletion”, or the “right to be forgotten”. This right means you can ask for your Personal Data to be deleted.

Sometimes we can delete your information, but other times it is not possible for either technical or legal reasons. If that is the case, we will consider if we can limit how we use it. We will also inform you of our reason for denying your deletion request.

Right to Ask Us to Limit How We Process Your Personal Data

This is otherwise known as the “right to restrict processing”. It is the right to ask us to only use or store your Personal Data for certain purposes. You have this right in certain instances, such as where you believe the data is inaccurate or the processing activity is unlawful.

Right to Ask Us to Stop Using Your Personal Data

This is otherwise known as the “right to object”. This is your right to tell us to stop using your Personal Data. You have this right where we rely on a legitimate interest of ours (or of a third party). You may also object at any time to the processing of your Personal Data for direct marketing purposes.

We will stop processing the relevant Personal Data unless: (i) we have compelling legitimate grounds for the processing that override your interests, rights, or freedoms; or (ii) we need to continue processing your Personal Data to establish, exercise, or defend a legal claim.

Right to Port or Move Your Personal Data

This is otherwise known as the “right to data portability”. It is the right to ask for and receive a portable copy of your Personal Data that you have given us, so that you can:

- move it;
- copy it;
- keep it for yourself; and/or
- transfer it to another organization.

We will provide your Personal Data in a structured, commonly used, and machine-readable format. When you request this information electronically, we will provide you a copy in electronic format.



Right Related to Automated Decision Making

We sometimes use computers to study your Personal Data. For decisions that may seriously impact you, you have the right not to be subject to automatic decision-making, including profiling. But in those cases, we will always explain to you when we might do this, why it is happening and the effect it may have on you or your Personal Data.

Right to Withdraw Your Consent

Where we rely on your consent as the legal basis for processing your Personal Data, you may withdraw your consent at any time. If you withdraw your consent, our use of your Personal Data before you withdraw it is still lawful.

As discussed above, if we requested your consent to process your Personal Data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of our processing before you withdrew your consent. It will also not affect processing performed on other lawful grounds. If you withdraw your consent, you may be ineligible to participate in the Trial.

Right to Lodge a Complaint with a Supervisory Authority

If the GDPR applies to our processing of your Personal Data, you have the right to lodge a complaint with a supervisory authority if you are not satisfied with how we process your Personal Data.

Specifically, you can lodge a complaint in the Member State of the European Union of your habitual residence, place of work, or the alleged violation of the GDPR.

To exercise any of your privacy rights or raise any other questions, please contact us by using the information in the “Contact Us” section below.

14. Contact Us

Trial Sponsor

If you have any questions about this Notice or our processing of your Personal Data, please contact us at:

Kronos Bio, Inc.

1300 So. El Camino Real, Suite 400
San Mateo, CA 94402
+1 (650) 781-5200
dataprivacy@kronosbio.com



You may also contact our Data Protection Officer directly using the contact details below. Please allow up to four weeks for us to reply.

Data Protection Officer

We have appointed [VeraSafe](#) as our Data Protection Officer. While you may contact us directly, VeraSafe can also be contacted on matters related to the processing of Personal Data. VeraSafe's contact details are:

VeraSafe

100 M Street S.E., Suite 600

Washington, D.C. 20003 USA

Email: experts@verasafe.com

Web: <https://www.verasafe.com/about-verasafe/contact-us/>

Toll-free: [1-888-376-1079](tel:1-888-376-1079)

European Union Representative

We have appointed [VeraSafe](#) as our representative in the EU for data protection matters. To contact VeraSafe, please use this contact form: <https://verasafe.com/public-resources/contact-data-protection-representative>.

Alternatively, VeraSafe can be contacted at:

VeraSafe Ireland Ltd

Unit 3D North Point House

North Point Business Park

New Mallow Road

Cork T23AT2P

Ireland

United Kingdom Representative

[VeraSafe](#) has also been appointed as our representative in the United Kingdom for data protection matters. To make an inquiry, please contact VeraSafe using this contact form: <https://verasafe.com/public-resources/contact-data-protection-representative> or via telephone at +44 (20) 4532 2003.

Alternatively, VeraSafe can be contacted at:

VeraSafe United Kingdom Ltd.

37 Albert Embankment

London SE1 7TL

United Kingdom



15. Changes to this Notice

If we change this Notice, we will publish the revised Notice on our website. We will also update the “Effective” date.