

AC IMMUNE SA

PRIVACY NOTICE

In this Privacy Notice, we describe how AC Immune processes personal information from individual persons (“Privacy Rules”). Preservation of, and respect for, our employees, business colleagues and vendors', and clinical trial's subjects' trust is critical to our continued success.

We will always process personal information:

- only for the purposes authorized by individuals (“Data Subjects”) or within the frame of our legal rights and obligations;
- fairly and proportionally;
- safely;
- lawfully, in accordance with applicable data protection laws, regulations and principles.

Who is AC Immune?

AC Immune is AC Immune SA, a clinical-stage biopharmaceutical company that aims to become a global leader in precision medicine for neurodegenerative diseases, including Alzheimer's disease, Parkinson's disease, and NeuroOrphan indications driven by misfolded proteins.

When we use the words **we** or **our**, we mean AC Immune and/or its affiliated companies.

When do these Privacy Rules apply?

These Privacy Rules apply when we process personal information collected from or on people in our conduct of business. They apply to personal data when we collect it from the Data Subject (being the person who the data identifies) or from other lawful sources.

Exclusions: These Privacy Rules are not relevant where we process information that does not allow the identification of a Data Subject, for instance anonymized data.

These Privacy Rules are overridden by our specific legal obligations on the processing of sensitive personal information of our employees, candidates applying for a position and clinical trial subjects, or where we commit to specific contractual obligations on the processing of personal information.

What is data processing?

Data processing is any operation or set of operations involving personal information, whether or not by automatic means, including collecting, using, disclosing, adapting, altering, correcting, retrieving, combining, blocking, erasing, transferring, destroying, recording, organizing, storing, disseminating, or otherwise making available, consulting, and using personal information.

What is personal information?

Personal information is information relating to a Data Subject that we can use to specifically identify such Data Subject, for example;

- name
- gender

- date of birth
- telephone number
- e-mail address
- address
- any other information that identifies or could identify a Data Subject and relates to such Data Subject.

What is sensitive personal information?

Some types of personal information are sensitive information. Sensitive information is personal information revealing or relating to a Data Subject's health, racial or ethnic origin, religious or philosophical beliefs, sex life, political affiliation, or trade union membership. Sensitive information is processed with additional care and protections.

When and how does AC Immune collect personal information?

AC Immune may collect personal information in a variety of ways, for example:

- in some places on our web site, for example on the "Contact us" page, individuals have the opportunity to send us personal information about them;
- we may collect personal information from Data Subjects when we communicate with them, with their employer or principal;
- in the course of engaging in commercial transactions with vendors and other business contacts.

How does AC Immune process personal information?

We may process personal information in a number of ways, for example:

- to respond to requests and enquiries of Data Subjects and contractual partners;
- to enter into contractual relationships with employees, vendors and institutions;
- to contact Data Subjects by email and postal services (or in other ways) within the scope of our legal rights and obligations or as authorized by Data Subjects;
- for the research and development of our therapies and diagnostics;
- to remove Data Subjects' personal identifiers so that information is made anonymous. In this case, Data Subjects are no longer identified as single unique individuals, and the non-personal information is no longer subject to these Privacy Rules;
- to enforce these Privacy Rules and otherwise protect our rights or property;
- to comply with a law or regulation, court order, or other legal obligation;
- for our other legitimate interests, unless such processing will unfairly prejudice the rights or freedoms of Data Subjects;
- in other ways to which Data Subjects give their consent.

We also restrict access to personal information to those of our employees, contractors and vendors who need to know that information to fulfil their job.

The processing of sensitive personal information of our employees and of participants enrolled in a clinical study sponsored by us or by our contractual partners, are subject to specific commitments of AC Immune defined in agreements with our employees, hospitals and vendors, in all cases:

- in ways for which the Data Subject has given his/her explicit consent, and
- according to and as permitted by national law.

Does AC Immune ever share personal information with third parties?

AC Immune will not share personal information of Data Subjects with a third party without their permission, except as otherwise reserved in these Privacy Rules.

In the ordinary course of business, we may share personal information with companies that we hire to perform services or with entities with whom we enter into contractual collaborations for the research and development of our therapies and diagnostics. In all cases in which a third party has access to a Data Subject's personal information, we ensure that that third party contractually undertakes to process personal information data in accordance with these Privacy Rules, or with other rules with similar or higher level of protection and we will not authorize them to keep, disclose or use Data Subjects' personal information with others except for the purpose of providing the required services or for purposes of the agreed collaboration with them.

If we are legally compelled to release a Data Subject's personal information in response to a judicial or administrative or otherwise by applicable regulations, we reserve the right to do so.

We may disclose Data Subjects' personal information to third parties only where we feel that the disclosure is necessary to:

- enforce these Privacy Rules;
- protect our rights or property;
- protect someone's health, safety or welfare;
- comply with a law or regulation, court order, or other legal process.

Will AC Immune ever transfer personal information about me to countries other than the country where I am located?

AC Immune may transfer personal information out of the country in which it was collected to any other country that is recognized by Swiss Regulations, by the EU General Data Protection Regulation and other countries having adequate privacy protections. We may transfer personal information to other countries, if:

- the transfer is necessary for the performance of a contract between AC Immune and a Data Subject or the employer or principal of a Data Subject;
- if the Data Subject consents to the transfer; or
- if the personal information will be adequately protected in the other country, by contract or other protection.

What happens if these Privacy Rules change?

If we decide to make a significant change to these Privacy Rules, we will describe any major changes in this section of this Privacy Notice. The most current copy of this Privacy Notice is always available on AC Immune's website.

What about the security of personal information?

We use reasonable physical, administrative, and technical safeguards to protect Data Subjects' personal information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction.

How long will AC Immune maintain my personal information?

We will not keep personal information for any longer than is required. In many cases, personal information must be kept for considerable periods of time to satisfy requirements imposed by international standards and regulations, or in order to make it available as and when questions or disputes arise. Retention periods will be determined taking into account the type of personal information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable opportunity.

We continue to treat personal information in accordance with these Privacy Rules so long as we retain it.

How to contact AC Immune?

We strive to keep our records of Data Subjects' information accurate. If a Data Subject ever notices that his/her information is not complete, accurate or current, or has questions or comments about this Privacy Notice, we may be contacted at:

AC Immune SA
Att: Data Protection Officer
EPFL Innovation Park, Building B
1015 Lausanne
Switzerland
e-mail : dpo@acimmune.com
Phone: +41 21 345 91 21
Fax: +41 21 345 91 20