

Whistleblowing policy

of Ryvu Therapeutics S.A., effective as of January 1, 2022*

1. Introduction

Ryvu is committed to conducting business in accordance with **Directive, Whistleblowers Act, Anti-harassment Policy, Ryvu's Code of Conduct** and the highest business standards. We encourage whistleblowing as it plays an important role in achieving this commitment and is a part of an open, honest and values-based culture. Whistleblowing is defined as the „raising of a concern, either internally (using Company's channels) or externally (to the authorities), about a danger, risk, malpractice or wrong-doing within the companies or enterprises". Thanks to effectively working whistleblowing procedure Ryvu's Management Board will be able to react faster to any incorrectness in Ryvu's operations and, having such knowledge, it will be able to take appropriate actions to stop such events from happening and to prevent them from happening in the future.

The content of **Whistleblowing policy** had been consulted with Ryvu's employee representatives. Every employee in Ryvu or a person falling within the scope mentioned below is obliged to make familiar with the Regulation upon being allowed to perform any work or services for Ryvu.

If you have any questions or concerns regarding this procedure please contact the Compliance Officer (e-mail: whistleblowing@ryvu.com) or Ryvu's Legal Department (e-mail: legal@ryvu.com).

2. Definitions

Anti-harassment Policy – dated 20 July 2022, Ryvu's internal policy which stipulates principles of preventing harassment and behaviours similar to harassment and explains the process flow in the situation of a reported case of harassment. Notifying harassment and behaviours similar to harassment is regulated by this procedure separately.

Directive - Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.

Report – (also in plural) information about the actual and potential irregularities reported under the Whistleblowing Policy made by the Whistleblower.

Retaliation - means any direct or indirect act or omission which occurs in a work-related context, is prompted by reporting and which causes or may cause unjustified detriment to the person reporting Violation to Ryvu.

Ryvu, Company - Ryvu Therapeutics S.A. with its principal place of business at ul. Sternbacha 2, 30-394 Krakow, Poland, entered into the register of companies of the National Court Register held by the District Court of Krakow-Srodmiescie under the number 0000367359.

Ryvu Code of Conduct - Ryvu's policy which focuses on the core values, shared responsibilities, worldwide commitments, and processes. It provides general guidance about Ryvu and all its subsidiaries and expectations.

Violation – (also in plural), any action or omission that constitutes a breach of legal regulations, internal organizational procedures, ethical norms, or principles of social coexistence as indicated in Section 3.

Whistleblower – a natural person who has made a Report, in particular:

- Ryvu's employee – for the purpose of this Procedure term „employee” shall mean current or former employees (within the meaning of Article 2 of the Act of 26 June 1974 - The Labour Code) who are working on permanent, part time, fixed term or temporary basis, as well as interns, secondees, managers and directors (including members of Management Board and Supervisory Board) and other persons working or providing services for Ryvu on the contractual basis (other than employment contract – such as civil agreements or on other legal ground);
- job candidates at Ryvu who becomes aware of a Violation during the recruitment process or pre-contract negotiations;
- Ryvu's current and former contractors, consultants, suppliers, clients, business partners etc. including their employees and a person performing work under the supervision and direction of a contractor, subcontractor or supplier, including under a civil law contract;
- Ryvu's shareholders.

Whistleblower Act - The Whistleblower Protection Act of 14 June 2024 (Journal of Laws No. 2024, item 928 as amended).

Whistleblower Policy, Policy – this policy.

3. Scope

This **Whistleblowing policy** sets out rules, which aim is to provide detailed guidance on how Whistleblower can report concerns. Moreover it explains the protection and support that will be given to those who speak up. Very often it is the employee who is the first one to realize possible incorrectness or any other shoddiness that take place during day-to-day activities within Company, that is why Ryvu will take all of the required measures to provide adequate protection for persons using procedure described in this document. In particular, this Policy indicates internal body responsible for receiving Reports and the means of issuing Reports, as well as relevant body competent to the activities such as performing follow-up, fulfilling legal obligations included in this Policy and ensuring that certain terms regarding Reports will be complied with.

Certain rights in this Policy are granted to persons who help Whistleblowers in making the Report in the work context and to those connected to the Whistleblowers such as co-workers or relatives who might face Retaliation.

Whistleblowers are entitled to disclose an information on Violation, including reasonable suspicion, about an actual or potential Violation that has occurred or is likely to occur in the organization where the notifying person works or has worked, or in another organization with which such person has or has had contact in a work-related context, or about an attempt to conceal such a Violation.

- Reported Violations - through an act or omission that is unlawful or intended to circumvent the law – disclosed by the Whistleblowers shall concern:
 - corruption
 - public procurement,
 - financial services, products and markets
 - prevention of money laundering, terrorist financing
 - product safety and compliance
 - transportation safety
 - environmental protection
 - radiation protection and nuclear safety,
 - food and feed safety
 - animal health and welfare
 - public health
 - consumer protection
 - protection of privacy and personal data
 - security of information and communication networks and systems
 - financial interests of the State Treasury of the Republic of Poland,
 - local government and the European Union units, the internal market of the

European Union, including public law rules of competition and state aid and corporate taxation, as well as constitutional freedoms and human and civil rights.

- constitutional freedoms and rights of humans and citizens - occurring in an individual's relations with public authorities and not related to the areas indicated in above-mentioned bullet points.
- serious breach of ethical standards or rules
- serious circumstances that could harm the organisation or society, such as for example misuse of public money, grants etc.
- serious errors or omissions

Whistleblowing policy does not apply to information:

- covered by the regulations on the protection of classified information, and
- other information not subject to disclosure by virtue of the generally applicable law for reasons of public security, covered by professional secrecy of medical and legal professions, the secrecy of judicial deliberations and criminal proceedings – as regards the secrecy of preparatory proceedings and the secrecy of court hearings conducted in camera.

Whistleblowers shall be protected in and by Ryvu as in accordance with the content of Section 7 of the Policy, as long as this person has reasonable grounds to believe that the information on Violation that is the subject of the Report is true at the time of notification and that such information indeed constitutes the Report on Violation as in regard to the above-mentioned scope.

4. Reporting Violations

Report on Violations can be made:

- orally or
- in written form by traditional post or
- in written form through Ryvu's internal channel.

All of the channels indicated as competent to acquire Reports made by Whistleblowers are designed in a secure manner that ensures the confidentiality of information being the subject of the Report, identity of the Whistleblower as well as any third party mentioned in the Report. Personal data and other information identifying Whistleblower can only be disclosed upon explicit Whistleblower's consent. The security measures undertaken by Ryvu shall prevent access thereto by non-authorized staff members.

In case the Whistleblower entrusts Ryvu with the Report, the internal entity which receives such

Report on Ryvu's behalf is the Compliance Officer. Ryvu has designated its General Counsel as Compliance Officer.

The above-mentioned function/person is contractually bound to confidentiality which means that no unauthorized person other than explicitly indicated by Ryvu as competent to solve cases regarding Reports shall have the access to data concerning Reports. Relevant staff will be trained towards data protection and safety measurements in the context of notifying. This means that Whistleblower can report Violations as defined in Section 2 of the Policy above in confidence that the personal data and other information allowing Whistleblower's identity to be recognized won't be disclosed without an explicit consent.

Complaints and concerns regarding suspected Violations may be made orally, in writing or electronically:

Oral submissions of the reported violation:

If you wish to report Violations in person you may do so during:

- a phone call during normal business hours (9 a.m. – 17 p.m.) which will be recorded or accurate written minutes of the phone call will be made. You can object to any of these, but you have to be aware that it can significantly affect the further investigation of the reported Violation.
Dedicated Compliance Officer's telephone number: **+48 880 752 124.**; or
- visit the Compliance Officer, during normal business hours (9 a.m. – 17 p.m.) to report your concern. Such meeting will be settled within 14 days from the date of receipt of such a request. The Compliance Officer's delivery address is Leona Sternbacha 2, 30-394 Krakow, Poland.

Please note the meeting can be documented. It can happen in one of the following ways:

- by making a recording of the conversation in a durable and retrievable form; or
- through preparing accurate written minutes of the meeting.

You can object to any of these, but you have to be aware that it can significantly affect the further investigation of the reported Violation.

If you agree to the preparation of the written minutes, you will be offered the opportunity to check, rectify and agree the minutes of the meeting by signing them.

Reports in writing of the reported Violation:

You can also send to the Compliance Officer a completed written **Whistleblowing Form** (which you can find as an **Appendix No 1** to this Procedure) via e-mail address: whistleblowing@ryvu.com.

Moreover, filled Whistleblowing Form can be sent by traditional post to the address:

Compliance Officer, delivery address: Sternbacha 2, 30-394 Kraków

In case the Whistleblower chooses this channel to file the Report via post, the Report should be sent in a securely sealed envelope marked “CONFIDENTIAL”. The administrative staff which might have the access to the post, shall be trained in this regard.

If the report involves the Compliance Officer, the form should be sent to Ryvu’s Chief Executive Officer to the address:

Ryvu Therapeutics S.A., Sternbacha 2, 30-394 Kraków to the attention of the Chief Executive Officer.

If you wish to remain anonymous we recommend sending the Report by traditional post which will not indicate your name or surname or any other characteristic feature that will reveal your identity.

In all of the above-mentioned cases (unless you decided to file the Report anonymously without providing any contact details) the Compliance Officer might on the later stage request further information or evidence, which can be helpful during investigation.

All of the above-mentioned channels are designed in a secure manner that ensures that the confidentiality of the identity of the Whistleblower as well as any third party mentioned in the Report is protected, and prevents access thereto by non-authorized staff members.

5. Further steps – confirmation of receiving the Report, follow-up and feedback

If the Whistleblower provides an appropriate address through which the person can be contacted, Compliance Officer will confirm receiving the Report on Violation within **7 days** from this event.

The 3-persons Committee appointed by the Ryvu is responsible for follow-up activities on behalf

of Ryvu. Three Committee Members are Permanent Members: Chief People Officer, Compliance Officer and Work Council Member.

If, upon examination of the Report, it turns out that the Committee member is the person whom the Report concerns or the person who files the Report, Ryvu is obliged to change the composition of the Committee by excluding the aforementioned member immediately and appointing another member who provides assurance of the diligent performance of the Committee member's duties.

The Committee will verify the Report (with the respect to the impartiality rule) and undertake an initial assessment of the information submitted in the Report. This means follow-up activities shall be undertaken in order to verify information contained in the Report, in respect to due diligence rule. Follow-up activities shall allow assessing the veracity of the allegations contained in the Report and, where appropriate, to address the Violation that is the subject of the Report, including by internal investigation, prosecution, action taken to recover funds, or closure of the intake and review process.

Ryvu ensures that during such investigations or other activities performed every person concerned will fully enjoy the right to an effective remedy, as well as the presumption of innocence and the rights of defence, including the right to be heard and the right to access relevant documentation (all of that without revealing the identity of Whistleblower). If the investigation establishes that a Violation occurred, appropriate action will be taken based upon law and Ryvu's internal procedures and regulations.

Within maximum of **3 months** from confirming receiving the Report (or if such confirmation has not been passed to the Whistleblower - within **3 months from the 7th day** since the Report had been filed), feedback is submitted and transferred to Whistleblower in order to inform about planned or already performed follow-up and the basis for such actions.

Feedback in particular concerns the Report of information whether or not an infringement of the law has been established by Ryvu after an investigation and on the measures, if any, that have been or will be taken by Ryvu in response to the identified infringement.

6. Anonymous Report

You may also submit your Report anonymously. In the case of an anonymous Report, you will not be required to provide any personal data. Please note that your personal data will also be handled confidentially in the case of a Report not submitted anonymously, in other words will not be shared with any third parties or unauthorized individuals. An anonymous Report may be submitted over the phone or by post addressed to Ryvu with note "Whistleblower Project CONFIDENTIAL". In the event of an anonymous Report, Ryvu cannot confirm receipt of the

Report, discuss the Report at a later time or notify you of the result of the procedure or any measures taken. In this case, it is especially important that Whistleblower shall provide as much information as possible when submitting Report in order for it to be understandable and for it to be appropriately processed. The process of verifying and follow-up actions of anonymous Whistleblower's Report will be conducted in the same way as described in Section 5 above subject to differences resulting of its nature, i.e. no confirmation of reception and feedback will be provided.

7. Non-Retaliation

Any form of Retaliation against Whistleblowers, the persons helping in the process of filing the Report in the work context or connected persons, including threats of Retaliation and attempts of Retaliation in regard with the Report is prohibited.

If the work was, is, or is to be performed under an employment contract, no retaliatory actions may be taken against the Whistleblower, particularly those involving:

- refusal to establish an employment relation
- termination or termination without notice of the employment relationship
- failure to conclude an employment contract for a definite time after termination of an employment contract for a probationary period, failure to conclude another employment contract for a definite time or failure to conclude an employment contract for an indefinite time after termination of employment contract for a definite time - in case the employee had a justified expectation that such a contract would be concluded with him
- reduction of remuneration for work
- demotion, skipping or withholding of promotion
- suspension, lay-off, dismissal or equivalent measures
- transfer of the employee to a lower position
- transfer of duties to another employee or suspension from performing the duties of an employee
- unfavourable change of location of place of work or in working hours
- withholding of training to improve professional qualifications
- a negative performance assessment or employment reference
- imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty or a similar in nature to those measures
- coercion, intimidation, harassment or ostracism
- discrimination, disadvantageous or unfair treatment
- harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income
- blacklisting on the basis of a sector or industry-wide informal or formal agreement, which

may entail that the person will not, in the future, find employment in the sector or industry and any actions aimed at making it difficult to find future employment in a given sector or industry

- early termination or cancellation of a contract for goods or services
- cancellation of a licence or permit
- unjustified psychiatric or medical referrals
- causing other non-material damage, including infringement of personal rights, in particular the good name

An attempt or threat to apply the measure specified above is also considered as retaliatory action due to reporting.

Ryvu will **take all of the possible and necessary measures** to ensure that none of the Whistleblowers experience any kind of Retaliation, both from Ryvu itself and other employees. Filing the Report shall not constitute any grounds for disciplinary liability of the Whistleblower.

Whistleblower is subject to the protection specified in this Section 7 from the moment of making the Report or public disclosure (understood as making Report about Violation known to the public), provided that he had reasonable grounds to believe that the information being the subject of the Report or public disclosure is true at the time of making the Report or public disclosure and that it constitutes information about an infringement of the law.

8. Register

Ryvu will keep records (in the form of register) of every report received internally, in compliance with all of the applicable confidentiality requirements set above and in respective legal acts. Ryvu is the controller of the data gathered and stored in the register.

Register of the Reports includes the following information: number of a case; subject of an infringement; date of Report; data on follow-up; date of closing the case. Compliance Officer is responsible for handling the Register. Chief People Officer is responsible for handling for register which pertain to harassment or any related behaviour and is ruled by **Anti-harassment Policy**.

Information stored in the Register is kept for 3 years since the Report has been received. Register template constitutes Appendix no. 2 to the **Whistleblowing Policy**.

9. Personal Data Protection

Processing of personal data as a result of the Report being issued, occurs in accordance with GDPR. Principles relating to processing of personal data indicated in article 5 of GDPR, such as: lawfulness, fairness and transparency; purpose limitation; accuracy; storage limitation; integrity; confidentiality; accountability – are respected at every level of enforcing this Policy.

Upon receipt of a Report, Ryvu shall process personal data to the extent necessary to accept that Report and to undertake an investigation. Personal data that is not relevant to the processing of the Report or for which there is no legal basis for processing shall not be collected, and if accidentally collected, shall be deleted within 14 days after it is determined that it is not relevant to the case or that there is no legal basis for processing.

The Compliance Officer, the Committee and other authorized persons who will process personal data while receiving a Report and for the purpose of investigations shall be authorized in writing to process personal data. These persons shall be obliged to maintain secrecy with respect to the information and personal data to which they have been granted access while receiving and processing Reports, except as provided for in generally applicable laws.

Ryvu undertakes not to disclose the identity of the Whistleblower to any person who is not authorized to do unless the Whistleblower gives Ryvu express consent to such disclosure. Ryvu also undertakes not to disclose to unauthorized persons the identity of the person to whom the Report relates and of third parties indicated in the Report. This restriction does not apply to actions taken under the law in connection with investigations conducted by public authorities or pre-trial or judicial proceedings conducted by courts, including for the purpose of guaranteeing the right of defense of the person to whom the Report relates.

Personal data obtained in connection with the receipt of a Report and the conduct of an investigation, including information placed in the Register, shall be processed for a period of 3 years after the end of the calendar year in which the investigation or other follow-up activities conducted as a result of an accepted Report were completed, or after the completion of proceedings initiated in connection with such activities.

Detailed information concerning the processing of the Whistleblower's personal data Ryvu is available in Personal Data Protection Clauses which constitute Appendix no 3 to the Whistleblowing Policy.

10. External reports

Please be informed about the possibility and the existence of a procedure or making external

notifications to public authorities and, where applicable, to European Union institutions, bodies, offices or agencies. These external notifications might be also anonymous and made either orally, in writing or electronically.

In Poland the central public authority competent for external disclosures on Violations, which additionally provides information and support in matters of whistleblowing reporting, is the Ombudsman (Rzecznik Praw Obywatelskich). Central public authority, while performing follow-up upon obtaining such external disclosure from the Whistleblower, where justified shall without undue delay forward the information contained in the notification to the competent institutions, bodies, offices or agencies of the European Union for further investigation. Those entities have in place external reporting channels and procedures for receiving reports of Violations.**

More information can be obtained at the website: <https://bip.brpo.gov.pl/pl/content/zlozenie-wniosku-do-rzecznika-praw-obywatelskich>

For EU bodies, it is necessary to identify the appropriate authority depending on the subject of the Report. For example, if the Report concerns fraud or other serious irregularities that could potentially have negative effects on EU financial resources, such as revenues, expenditures, or assets owned by EU institutions, it should be reported to the European Anti-Fraud Office (OLAF). More information can be found at the following link: https://fns.olaf.europa.eu/main_en.htm

Please also note that such external reports can be made directly to the competent authorities, without a need to file disclosure on the basis of **Whistleblowing Policy**.

***Valid from 25th December 2024*

11. History of Policy Updates*

| No. | Date |
|-----|------------|
| 1. | 18.09.2024 |

Appendix No 1

Ryvu's Whistleblowing Form

Caution: Please note that this form is intended to be used strictly for reporting of whistleblowing cases relating to illegal, unethical, fraudulent or corruption activities occurring within Ryvu Therapeutics S.A. or relating directly to any Ryvu's personnel. All other feedback or enquiries not relating to the whistleblowing purpose above should be submitted directly to your supervisor or Human Resources Department.

1. Please select the most appropriate category for this report:

- Breach of law or policy
- Fraud
- Corruption
- Bribery
- Collusion
- Criminal Offences
- Deliberate
- Improper conduct or unethical behaviour
- Others (please specify _____)

2. How would you like us to contact you*?

- Phone: _____
- E-mail: _____
- Other: _____

*Please note that this form can be submitted anonymously (you do not have to provide Ryvu with your personal data), nevertheless if you wish to receive a confirmation of submission of this form and in the further stage be informed about the steps taken to deal with the reported action (in accordance to applicable laws), Ryvu will need your contact details to reach you)

3. Would you like to disclose your identity to Ryvu whistleblowing channel (please note that this form can also be submitted anonymously)?

- YES
- NO

4. If YES, please provide your name, position and name of organization

Name: _____

Position: _____

Organization: _____

5. What is the incident you wish to report? Where, when and how did the incident occur?
Please provide us with full description.

6. When the incident was first observed? Please advise on date and time of incident.

7. Has this occurred before? If yes, please advise frequency or occurrence and the period of time.

8. Were other people involved? If yes, who were they? (please provide their name/position)

9. Were there any witnesses to the incident? If yes, who were they? (please provide their name/position)

10. Have you reported the incident internally (to your supervisor or HR Department or through any other channels? If yes, to whom have you made the report ?

11. List of appendices:

a) ...

Thank you so much for your submission.



Appendix No 2

Ryvu's Whistleblowing Register Template

| Case number | Subject of Violation | Personal data of the Whistleblower* | Contact address of the Whistleblower* | Date of submission of the Report | Information on follow-up actions taken | Date of completion of the case |
|--------------------|-----------------------------|--------------------------------------------|----------------------------------------------|-----------------------------------------|-----------------------------------------------|---------------------------------------|
| ... | | | | | | |

*If applicable

Appendix 3

A. Personal Data Protection Clause for Whistleblower

1. Data controller

The controller of your personal data is Ryvu Therapeutics S.A. with its registered office in Kraków, ul. Leona Henryka Sternbacha 2, 30-394 Kraków (hereinafter: we).

You can contact us in one of the following ways:

- using the e-mail address: gdp@ryvu.com, or
- by sending a letter in paper form to Ryvu Therapeutics S.A., ul. Leona Henryka Sternbacha 2, 30-394 Kraków

2. Data Protection Officer

We have appointed a Data Protection Officer. This is the person you can contact in all matters concerning the processing of your personal data and the exercise of your rights related to the data processing. You can contact the Data Protection Officer by email: dpo@ryvu.com

3. Purposes of your personal data processing and its legal basis

| Purposes of data processing | Legal basis for data processing |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • receipt of your Report of a violation of the law or the Ryvu's Code of Conduct through the dedicated reporting channels we have implemented • Taking follow-up actions, including conducting investigations • Providing you with feedback on the actions planned or taken in relation to your Report • registration of your Report in the register of internal reports | <ul style="list-style-type: none"> • fulfilling our legal obligations under the Law on the Protection of Whistleblowers (Article 6(1)(c) GDPR) • additionally, with respect to special categories of personal data (as defined in Article 9 GDPR), the legal basis for processing is the necessity of processing for reasons of important public interest (Article 9(2)(g) GDPR) |
| <ul style="list-style-type: none"> • investigating or defending against claims related to reported violations | <ul style="list-style-type: none"> • our legitimate interest in being able to pursue claims (Article 6(1)(f) GDPR) • if special categories of personal data (as defined in Article 9 GDPR) will be processed for this purpose, the legal basis for their processing will be the necessity of the processing for the establishment, investigation or defense of claims (Article 9(2)(f) GDPR) |

4. Data source

We have received your data directly from you.

5. Storage period of personal data

Personal data processed in connection with accepting a report or taking follow-up actions and documents related to that report are stored for a period of 3 years after the end of the calendar year in which the external

report was submitted to the public authority competent to take follow-up actions or completed follow-up actions, or after completion of proceedings initiated by these actions.

6. Data recipients

We will provide your personal data to:

- to our IT providers. Such providers will process data on the basis of a contract with us and only in accordance with our instructions;
- to external law firms in connection with the conduct of proceedings and representation of us in legal proceedings;
- to other external entities providing consulting, advisory, auditing, accounting, tax, auditing services.

7. You have the following rights related the processing of your personal data

You have the following rights related to the processing of personal data:

- the right to object to the processing of your data on the grounds of your particular situation - if we process your data based on our legitimate interest.
- the right to access your personal data,
- the right to request rectification of your personal data,
- the right to request erasure of your personal data,
- the right to request restriction of the processing of your personal data,

To exercise the above rights, please contact us (see section 1 or 2 above for contact details).

Right to object

Since we process your data based on our legitimate interest - you have the right to object to the processing on the grounds of your particular situation.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with the supervisory authority competent for personal data protection, i.e. the President of the Personal Data Protection Office.

B. Personal Data Protection Clause for the person concerned by Whistleblower’s report

1. Data controller

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You can contact us in one of the following ways:

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- by sending a letter in paper form to Ryvu Therapeutics S.A., ul. Leona Henryka Sternbacha 2, 30-394 Kraków

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3. Purposes of your personal data processing and its legal basis

| Purposes of data processing | Legal basis for data processing |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • receipt of a Report of a violation of the law or the Ryvu’s Code of Conduct through the dedicated reporting channels we have put in place • taking follow-up actions, including conducting investigations • registration of the Report in the register of internal notifications | <ul style="list-style-type: none"> • fulfilling our legal obligations under the Law on the Protection of Whistleblowers (Article 6(1)(c) GDPR) • additionally, with respect to special categories of personal data (as defined in Article 9 GDPR), the legal basis for processing is the necessity of processing for reasons of important public interest (Article 9(2)(g) GDPR) |
| <ul style="list-style-type: none"> • investigating or defending against claims related to reported violations | <ul style="list-style-type: none"> • our legitimate interest in being able to pursue claims (Article 6(1)(f) GDPR) • if special categories of personal data (as defined in Article 9 GDPR) will be processed for this purpose, the legal basis for their processing will be the necessity of the processing for the establishment, investigation or defense of claims (Article 9(2)(f) GDPR) |

5. Storage period of personal data

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6. Data recipients

We will provide your personal data to:

- to our IT providers. Such providers will process data on the basis of a contract with us and only in accordance with our instructions;
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You have the following rights related to the processing of personal data:

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- the right to access your personal data,
- the right to request rectification of your personal data,
- the right to request erasure of your personal data,
- the right to request restriction of the processing of your personal data,

To exercise the above rights, please contact us (see section 1 or 2 above for contact details).

Right to object

Since we process your data based on our legitimate interest - you have the right to object to the processing on the grounds of your particular situation.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with the supervisory authority competent for personal data protection, i.e. the President of the Personal Data Protection Office.

C. Personal Data Protection Clause for the person whose personal data has been included in the Whistleblower’s Report.

1. Data controller

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You can contact us in one of the following ways:

- using the e-mail address: gdp@ryvu.com, or
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| <ul style="list-style-type: none"> • receipt of a Notification of a violation of the law or the Ryvu’s Code of Conduct through the dedicated notification channels we have put in place • taking follow-up actions, including conducting investigations | <ul style="list-style-type: none"> • fulfilling our legal obligations under the Law on the Protection of Whistleblowers (Article 6(1)(c) GDPR) • additionally, with respect to special categories of personal data (as defined in Article 9 of the GDPR), the legal basis for processing is the necessity of processing for reasons of important public interest (Article 9(2)(g) of the GDPR) |
| <ul style="list-style-type: none"> • investigating or defending against claims related to reported violations | <ul style="list-style-type: none"> • our legitimate interest in being able to pursue claims (Article 6(1)(f) GDPR) • if special categories of personal data (as defined in Article 9 GDPR) will be processed for these purposes, the legal basis for their processing will be the necessity of the processing for the establishment, investigation or defense of claims (Article 9(2)(f) GDPR) |

5. Storage period of personal data

Personal data processed in connection with accepting a report or taking follow-up actions and documents related to that report are stored for a period of 3 years after the end of the calendar year in which the external report was submitted to the public authority competent to take follow-up actions or completed follow-up actions, or after completion of proceedings initiated by these actions.

6. Data recipients

We will provide your personal data to:

- to our IT providers. Such providers will process data on the basis of a contract with us and only in accordance with our instructions;
- to external law firms in connection with the conduct of proceedings and representation of us in legal proceedings;
- to other external entities providing consulting, advisory, auditing, accounting, tax, auditing services.

7. You have the following rights related the processing of your personal data

You have the following rights related to the processing of personal data:

- the right to object to the processing of your data on the grounds of your particular situation - if we process your data based on our legitimate interest.
- the right to access your personal data,
- the right to request rectification of your personal data,
- the right to request erasure of your personal data,
- the right to request restriction of the processing of your personal data,

To exercise the above rights, please contact us (see section 1 or 2 above for contact details).

Right to object

Since we process your data based on our legitimate interest - you have the right to object to the processing on the grounds of your particular situation.

Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with the supervisory authority competent for personal data protection, i.e. the President of the Personal Data Protection Office.