

PRIVACY NOTICE

Introduction

AXON COVIDAX, a. s., Dvořákovo nábrežie 10, 811 02, Bratislava, Slovak Republic (“AXON COVIDAX” or “we”) and its affiliates are a group of companies operating in the field of biotechnological research and development. COVIDAX is committed to ensuring protection of personal data in line with applicable regulation to protect the fundamental human rights and freedoms of individuals. This notice is a reflection of this commitment.

In accordance with the applicable laws in the field of personal data protection and privacy, we hereby inform you on the way we handle the personal data that we collect, store and process when you use this website and when you invest in AXON COVIDAX.

This notice applies when AXON COVIDAX is the data controller of the data specified in this notice.

Data Controller

The controller of the data is AXON COVIDAX, a. s., Dvořákovo nábrežie 10, 811 02, Bratislava, Slovak Republic.

Contact Persons In Matters Related To Data Processing

Any questions with respect to data processing and privacy shall be addressed as follows:

Email: dpo@axon-neuroscience.eu

Address: Data Protection Officer
AXON Neuroscience CRM Services SE
Dvořákovo nábrežie 10
811 02 Bratislava
Slovakia
Marked „DO NOT OPEN“.

What Personal Data We Process And Why We Process This Data

We process the following categories of personal data, for the following reasons, and on the basis of the following legal grounds:

- **Website usage data:** this category of data including in particular cookies (click here for more information on how we use cookies), your IP address, geographic location, operating system, browser type and information about your usage of the website (this data, “**Website Usage Data**”).

The Website Usage Data may be used for monitoring the use of the website and for improving the user experience on our website.

The legal basis for processing of the Website Usage Data is our legitimate interest in monitoring our website traffic and improving the user experience.

- **Transaction data:** this category includes in particular your name, job title, address of residence, telephone number, mobile phone number, email address, nationality, birthplace, the number of shares bought, your bank account identifiers and other payment information, and data collected as part of our troubleshooting and other communication (this data, “**Transaction Data**”).

The Transaction Data will be used to enable you to invest in AXON COVIDAX by entering into necessary contractual documentation and to allow us to comply with our legal obligation related to you becoming an investor in AXON COVIDAX.

The legal basis for processing of the Transaction Data is performance of a contract and taking steps, at your request, to enter into the contract.

- **Data required for purposes of prevention of money laundering and financing of terrorism and know-your-client:** this category of data includes in particular scans of your personal identification documents, passport number, driver’s license details, national identity card details, video identification data, photograph identification, resident permit information, data necessary for identification of the source of the funds for your investment (this data, “**AML Data**”).

The AML Data may be used for checking of your suitability to invest in AXON COVIDAX and to make sure COVIDAX is not a vehicle for money laundering and financing of terrorism.

The legal basis for processing of the AML Data is our legitimate interest to know the identity of our investors and to make sure AXON COVIDAX is not a vehicle for money laundering and financing of terrorism.

Recipients of Personal Data

We may share your personal Transaction Data and AML Data with our holding companies for the purposes of processing your investment.

To the necessary extent, we may share some of your Transaction Data and AML Data with service providers for personal identification as part of our anti-money laundering efforts for the screening of customers or transactions in order to make sure COVIDAX is not a vehicle for money laundering and financing of terrorism. For these purposes, we use public databases and ID verification partners to verify your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job position, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other data relevant for this purpose.

Other recipients may include brokers, advertising agencies, IT and database providers, and cloud services providers.

If we are required to do so by applicable laws or under regulatory codes or practices we follow, or if we are asked so by any public or regulatory authority, we may disclose your personal data to third parties and legal and regulatory authorities.

We will also provide your personal data to certain public bodies that keep registries of shareholders, such as a central securities depository or a commercial register.

If you wish to receive a list of recipients of your personal data, please write an email to the contact person referred to at the beginning of this notice.

Transfers outside the European Economic Area

As a general rule, your personal data will not be processed outside the European Economic Area. If processing of your personal data outside the European Economic Area is necessary, we will use appropriate safeguards to make sure that the level of protection of your data guaranteed by the legislation in the European Economic Area is not undermined.

Your Rights

Under the applicable laws you have the following rights with respect to your personal data:

- right to access
- right to rectification;
- right to erasure;
- right to restrict processing;
- right to data portability;
- right to withdraw consent, if data processing takes place on the basis of your consent.

Please refer to the relevant laws (in particular the 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 (General Data Protection Regulation) and any national laws) and guidelines for an explanation of the extent and conditions under which you may exercise these rights.

In addition, you may complain about how your data is handled to a supervisory authority that is responsible for enforcing data protection law. A list of European Union supervisory authorities is available here:

http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

Security of your personal data

To help protect the privacy of personal data we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide

benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your personal data. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Automated decision-making

We perform no automated decision-making when processing personal data in any context.

Storage Period

We will store the Transaction Data and AML Data for the duration of the legal relationship between us and you and then in accordance with the applicable legislation on archiving. Under the currently applicable legislation, this data must be stored during the whole existence of the company.

Changes to this policy notice

We may change this policy notice occasionally at our own discretion by publishing a new version on this website. Please check this website regularly to ensure you are aware of any such changes.

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