

# NLC Privacy Statement

*Last updated: November 2023*

## 1. General information

Your privacy is important to us. All personal data will be protected in accordance with the applicable data protection laws, which includes - for the European Economic Area (EEA) - the General Data Protection Regulation (GDPR). This Privacy Statement explains how and for which purposes NLC Ventures Netherlands B.V. (referred to in this Privacy Statement as "NLC", "we", "our" or "us") collects, holds and discloses your personal data when you visit our website, contact us, do business with us or apply for a job at NLC, and what privacy rights you have with regard to your personal data.

Do you have questions about this Privacy Statement or the protection of your privacy? Please contact us via the contact information provided at the end of this Privacy Statement.

## 2. Who is responsible for processing your personal data?

NLC is a "controller" with regard to the processing of your personal data. This means that we are responsible for processing your personal data in accordance with the applicable data protection laws, including the GDPR.

## 3. Which personal data do we process and for what purpose(s)?

Below you will find an overview of the purposes for which NLC processes personal data about you. It includes which personal data NLC uses for that specific purpose, what the legal basis is and for how long your personal data is retained.

### Website visitors

We automatically collect generated data about your use of the website. This information consists of your IP address (a unique number, which makes it possible to recognize your device), data displayed or clicked on (including UI elements, links); and other log information (including browser type, IP address, date and time of access, cookie ID, and referrer URL). We need this information in order for the website to work as optimally as possible (for example, to display content correctly and to keep the website secure).

The processing of these personal data is based on our legitimate interests in offering and securing our website and pursuing the other processing purposes as described above or based on your consent for collecting certain categories of personal data with the usage of cookies and other technologies. For more information on how we use your information when you visit our website, please be referred to our [Cookie Statement](#).

### Contact

You may contact us in various ways, including via the contact form on the website, by e-mail and by telephone. The information we obtain from you for this contact will be used to answer your question and to provide our services. The legal ground for this data processing can be found in the legitimate business interests of NLC. Our employees' data communication, including email correspondence, contacts and calendar data, is retained in the CRM system used by NLC for a period of four years.

### Newsletters

If you would like to keep informed of our developments and studies, you may subscribe to our newsletter. We process your e-mail addresses in order to send the newsletters. NLC has a legitimate interest in this processing for such direct marketing purposes. You may unsubscribe at any time via the unsubscribe button in our newsletter.

NLC will retain your e-mail address for this purpose as long as you are subscribed to the newsletter and will delete your data within one month of unsubscribing.

### Email analytics

NLC has incorporated an e-mail tracking functionality into its newsletters by embedding a small, transparent image pixel in the outgoing newsletter. As soon as you open the newsletter, NLC can access certain information, such as the recipient's name and surname, the recipient's e-mail address, confirmation that the recipient has received and opened the e-mail, IP address from which the e-mail was opened, whether a link in the e-mail was clicked on, IP address from which the link was clicked on and browser and operating system used by the person who clicked on the link. The processing of these personal data is necessary for the protection of NLC's legitimate interests, i.e. to analyse the scope and effectiveness of newsletters sent by NLC. Personal data will not be retained for longer than one month.

### Careers at NLC

When applicants provide us with personal data, we will process such personal data for recruitment and selection purposes. The personal data and documents provided by you may include your contact details, CV and motivation letter. We process this personal data to determine your eligibility for the vacancy for which you have applied or, in case of an open application, to determine your eligibility for a position within NLC. NLC has a legitimate interest in the aforementioned data processing activities in selecting the best candidates for NLC.

When you were recruited by NLC, either internally or for one of our ventures and your employment with this venture or at NLC is terminated, we may do an exit interview with you and store the input you provide for internal educational purposes, which is in NLC's legitimate interest.

NLC stores applicants' personal data during the recruitment and selection procedure. Your application data will be retained (in the event of rejection) for this purpose for a period of four weeks after the end or completion of the application procedure. Only with your consent will NLC retain your application data for a period of one year in order to be able to inform you if a suitable position becomes available for you at a later date.

### Investors, suppliers, partners

We process personal data that we obtain in the context of our interactions with you as (a staff member of) a (prospective) supplier, investor or business partner because it is necessary to enter into a contract and for the performance of that contract. We may also need your personal data in order to comply with our legal obligations (for example, tax and accounting regulations) and in order to pursue our legitimate interests (for example, in case of a dispute). For these purposes, we may collect and process identification data (such as, name, email address, phone number, postal address), employment data (such as, employer, function) financial data (such as, bank account), and other information provided (for instance in correspondence with us). NLC will retain your information for as long as we hold a business relationship. Data required for our bookkeeping is retained for seven years.

### Visitors to our office

We meet visitors at our office, including external training providers, job applicants, suppliers, investors and stakeholders. If your visit is planned, we will send your name and visit information to reception before your visit. If you arrive without an appointment, your name will be noted by the reception upon arrival. The purpose for processing this information is for security and safety reasons and the processing is based on our legitimate interests and the legitimate interests of the building operator (from which we rent our office).

### Complaints, disputes and legal claims

We may process personal data to exercise our rights by establishing, exercising or defending a legal claim or in order to defend ourselves or our staff against a legal claim from third parties (including disputes, complaints, questions and/or investigations). It is in our legitimate interest to process personal data to be able to exercise our rights and to defend ourselves and our staff against legal claims. Your personal data will be retained for as long as necessary to achieve these purposes.

## 2. WHO DO WE SHARE DATA WITH?

We only share your data with third parties if:

- This is necessary for the provision of a service or the involvement of the third party. Sub-contractors, for example, will in principle only get access to the personal data that they require for their part of the service provision and will not be allowed to process the data for their own purposes.
- The persons within the third party that have access to the personal data are under an obligation to treat this data confidentially. Where necessary this is also contractually agreed on.
- The third party is obliged to comply with the applicable regulations for the protection of personal data, for instance because we have concluded an agreement with this party. This includes that the party is obliged to ensure appropriate technical and organizational security measures, and that any transfer of personal data to countries outside the EEA is adequately legitimized.

We could share your data on a need-to-know basis with the parties mentioned below. In this context, "need-to-know" means that a party only gets access to your personal data if and insofar as this is required for the professional services provided by this party.

- Authorized persons, employed by NLC, who are involved with the processing activity concerned. Such as, the members of the support team you are in contact with.
- Authorized persons, employed by service providers / sub-contractors engaged by NLC, who are involved with the processing activity concerned.
- Authorized government institutions. Such as, courts, police, and law enforcement agencies. We may release information about you when legally required to do so, at the request of governmental institutions conducting an investigation or to verify or enforce compliance with applicable laws and regulations. We may also disclose such information whenever we believe disclosure is necessary to protect the rights, property or safety of NLC or others.

## 3. TO WHICH COUNTRIES WILL WE TRANSFER DATA?

Parties involved with the processing of personal data originating from the EU, may be located in a different country, such as the United States. In case your data is processed outside the EEA, the transfer is legitimized in the manner described below. You can find an overview of the EEA countries [here](#).

### Transfers outside the EEA

In order to comply with EU data protection legislation for international transfers, we carefully consider whether an adequate level of protection can be safeguarded. The transfer of your personal data to a third party outside the EEA, can in the first place be legitimized based on an adequacy decision adopted by the European Commission, in which it decided that the (part within the) third country in question offers an adequate level of data protection. You can find an overview of the adequacy decisions that have been taken [here](#).

If your personal data is transferred to a country outside the EEA for which there is no adequacy decision in place, we implement the relevant version of the Standard Contractual Clauses (SCCs) in the (prospective) contract with the party involved in the transfer. This is a standard contract approved by the European Commission to safeguard the protection of your personal data and in which the parties fill out the appendices to provide relevant information about the processing. Where appropriate, additional safeguards are taken.

In specific situations we can also rely on the derogations from article 49 GDPR to legitimize the data transfer. This means that we may transfer personal data: (i) with your explicit consent, (ii) if this is necessary for the performance of a contract that has been concluded with you or has been concluded in your interest, or (iii) if this is necessary for the establishment, exercise or defence of legal claims. Lastly, in exceptional cases we may also transfer personal data if the data transfer is

necessary for our compelling legitimate interests and is not overridden by your interests or rights and freedoms.

For more information about the safeguards for international data transfers, please contact us using the contact details included in this Privacy Statement.

#### 4. WHAT ARE YOUR PRIVACY RIGHTS?

Based on the General Data Protection Regulation ("GDPR"; (EU) 2016/679) you have various privacy rights. To what extent these rights can be exercised, may depend on the circumstances of the processing, such as the manner in which NLC processes the personal data and the legal basis for the processing. Below we included a summary of the relevant privacy rights under the GDPR.

- **Right to withdraw consent.** If the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time. After you have withdrawn your consent, NLC will no longer process your personal data for the related purposes. Please note that the withdrawal of consent does not affect the lawfulness of the processing before it has been withdrawn.
- **Right of access.** This concerns the right to request access to your personal data. This enables you to receive a copy of the data we hold about you (but not necessarily the files themselves). We will then also provide further specifics of our processing of the personal data. For example, the purposes for which we process the data, where we got it from, and with whom we share it.
- **Right of rectification.** You have the right to obtain rectification of incorrect or incomplete personal data. If needed, you may provide additional personal data in order to complete the collection of personal data.
- **Right to erasure.** This concerns the right to request erasure of the data. This enables you to ask us to delete or remove personal data where: (i) the data is no longer necessary, (ii) the processing activities have been objected to, (iii) the data has been unlawfully processed, (iv) the data has to be erased on the basis of a legal requirement, or (v) where the data has been collected in relation to the offering of information society services. However, we do not have to honor such requests in all cases.
- **Right of restriction.** The right to restriction of processing means that NLC will continue to store personal data at your request but may in principle not do anything further with it. In short, this right can be exercised when NLC does not have (or no longer has) any legal grounds for the processing of the data or if this is under discussion.
- **Right to data portability.** You have the right to receive your personal data that you have provided to NLC in a structured, commonly used and machine-readable form and you have the right to transmit that data to another data controller, where the processing is based on your consent or on the performance of a contract.
- **Right to object.** Under certain circumstances, you have the right to object to processing of your personal data where we are relying on legitimate interests as processing ground. Insofar as the processing of your personal data takes place for direct marketing purposes, we will always honour your request. If it concerns processing for other purposes, we will make a new balance of interests and determine whether NLC has compelling legitimate grounds that override your interests.
- **Automated decision-making.** This concerns the right not to be subject to a decision based solely on automated processing, which significantly impacts you. In this respect, please be informed that when processing your personal data as described in this Privacy Statement, we do not make use of automated decision-making.
- **Right to complaint.** NLC is committed to resolving complaints about your privacy and our collection or use of your personal data. If you are not satisfied with the way NLC handles your personal data, you may file a complaint to the appropriate supervisory authority, in particular in the EU Member State of your habitual residence, place of work or where an

alleged infringement took place. Please be referred to the website of the European Data Protection Board (EDPB) for an overview of the supervisory authorities and their contact details. However, we would appreciate the chance to deal with any concerns before the supervisory authority is approached, so please contact us beforehand.

#### How we handle request

You can submit your request to NLC via [privacy@nlc.health](mailto:privacy@nlc.health). We will respond to your request as soon as possible, but in any case within one month of receipt of the request. This period may be extended by two months if necessary, depending on the complexity of the requests and their number. We will inform you within one month of receipt of the request if such an extension is to be made, stating the reason for the delay. If we do not act upon your request, we will inform you of the reasons for not acting.

## 5. HOW CAN YOU CONTACT US?

If you have any questions, concerns, or complaints, feel free to contact us at [privacy@nlc.health](mailto:privacy@nlc.health) or at the contact details below.

NLC Ventures Netherlands B.V.

Paasheuvelweg 25

1105 BP Amsterdam

The Netherlands

## 6. CHANGES TO THIS PRIVACY STATEMENT

We may change this Privacy Statement from time to time to accommodate new technologies, industry practices, regulatory requirements or for other purposes. The latest version can always be consulted via this website. Important changes will also be communicated proactively. This Privacy Statement was last amended in November 2023.