

PRIVACY POLICY – WEBSITE VISITORS (GENERAL PUBLIC)

This privacy policy explains how Bavarian Nordic A/S (“Bavarian Nordic”, “us”, “we” or “our”) collects and handles your personal information when you access and use our website(s) (“Site”).

The Privacy Policy is intended to meet our duties of Transparency under applicable data protection legislation, in particular the “**General Data Protection Regulation**”, Regulation (EU) 2016/679 or “**GDPR**” and the Swiss Data Protection Act or “**FDPA**”.

1. DATA CONTROLLER

The legal entity responsible for the processing of your personal information is:

Bavarian Nordic A/S
CVR: 16271187
Philip Heymans Alle 3
DK-2900 Hellerup
Denmark

If you have inquiries and/or questions to our processing of your personal information, please contact us at data.request@bavarian-nordic.com

2. CATEGORIES OF PERSONAL INFORMATION

All the personal information we collect, both from you and from any third parties about you, is outlined in the table below:

Category of personal information collected	What this means
Contact Data	Your email address and any other information you provide in any email you send us.
Technical Data	Internet protocol (IP) address, your login data (where applicable), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website or use our services.

Aggregated data

We also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information, but once in aggregated form it will not constitute personal information for the purposes of the GDPR and the FDPA as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal information so that it can directly or

indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

No Special Categories of Personal Data

We do not collect any “**Special Categories of Personal Data**” about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, social security number, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Please do not provide us with any such data types.

3. USE OF PERSONAL INFORMATION

We will only use your personal information for the purposes for which we collected it as listed below, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will update this Privacy Policy and we will explain the legal basis which allows us to do so.

4. LEGAL BASIS

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use. Most commonly, we will rely on one of the following legal bases:

- Where we need to perform a contract we are about to enter into or have entered into with you (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the purpose in question (“**Consent**”).

Generally, we do not rely on your Consent as a legal basis for using your personal information.

We have set out below, in a table format, the legal bases we rely on in respect of the relevant purposes for which we use your personal information.

Purpose	Category(ies) of personal information involved	Why do we do this	Our legal basis for this use of data
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Troubleshooting and Security	Contact Data Technical Data	To track issues that might be occurring on our systems. To keep our website, our services and associated systems operational and secure.	Legitimate Interests. It is in our legitimate interests that we are able to monitor and ensure the proper operation of our Site and associated systems and services. We have a legitimate interest in ensuring the ongoing security and proper operation of our services, website and associated IT services and networks.
Compliance with Law	Contact Data Technical Data	We may process your personal information (including sharing it with competent authorities or regulators, and/or our advisers, see Section 5 below) where necessary to comply with legal and regulatory requirements, and protect against fraud, illegal activity, and claims and other liabilities.	Compliance with Law.

5. SHARING OF YOUR PERSONAL INFORMATION

We may share your personal information on a strict need-to-know basis with the following recipients:

Recipients	Category(ies) of personal information we share.	Why we share it	Location(s)
Our Affiliates	Contact Data	Our affiliates help us provide our service and help manage our customer relationships (including providing customer support, customer liaison etc.).	Within Europe incl. Switzerland) The United States

Service Providers (as listed in Annex A)	Contact Data Identity Data	Our service providers provide us with IT and system administration services.	Within Europe incl. Switzerland) Canada The United States
Professional advisers	Contact Data	Our lawyers, bankers, auditors and insurers and other advisers who provide consultancy, banking, legal, insurance and accounting services.	Within Europe (incl. Switzerland) The United States
Regulators and other authorities	Contact Data	Authorities may require reporting of processing activities in certain circumstances	Within Europe (including Switzerland) The United States

6. TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA AND SWITZERLAND

As the clear main rule, your personal information will only be processed and stored in Denmark and Germany.

If it becomes necessary to transfer all or some of your personal information to countries outside the EU/EEA and Switzerland, we will only transfer the personal information after having provided one of the following safeguards:

- We may transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission. For further details, see [European Commission: Adequacy of the protection of Personal Data in non-EU countries](#). For transfers from Switzerland, we will follow the list set out by the Swiss Federal Data Protection and Information Commissioner.
- Where we use service providers outside Europe, we may use specific contracts approved by the European Commission, which give personal information the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of Personal Data to third countries](#).
- Where we use service providers based in the U.S., we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal information shared between Europe and the U.S. For further details, see [European Commission: EU-U.S. Privacy Shield](#). For transfers from Switzerland to the U.S., we may transfer data to service providers if they are part of the Swiss-US Privacy Shield

7. RETENTION OF YOUR PERSONAL INFORMATION

It is our policy not to keep personal information for longer than necessary, unless a longer retention period is required by applicable law.

Your personal information will be deleted in accordance with the Bavarian Nordic Personal Data Retention Procedure.

For further information, please contact us as provided for in Section 1.

8. HOW WE KEEP YOUR PERSONAL INFORMATION SECURE

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

We limit access to your personal information to those employees and other staff who have a business need to have such access. All such people are subject to a contractual duty of confidentiality.

We have put in place procedures to deal with any actual or suspected personal information breach. In the event of any such breach, we have systems in place to work with applicable regulators. In addition, in certain circumstances (e.g., where we are legally required to do so) we may notify you of breaches affecting your personal information.

9. YOUR RIGHTS

By law, you have the following rights to:

- Request access to and rectification or erasure of your personal information.
- Object to the processing of your personal information and have the processing of your personal information restricted.
- Object to the processing of your personal information. This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.
- Receive your personal information, or request the transfer thereof to a third party you have chosen, in a structured, commonly used and machine-readable format (data portability). Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

How to exercise your rights

If you want to exercise any of the rights described above, please contact us as provided for in Section 1.

Typically, you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, except in relation to your right to withdraw your consent, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within thirty (30) days. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your personal information, please contact us as provided for in Section 1. We will reply to your complaint as soon as we can.

If you feel that your complaint has not been adequately resolved, please note that the GDPR gives you the right to contact your local data protection supervisory authority, as listed [here](#). The data protection supervisory authority for Switzerland is the [Office of the Federal Data Protection and Information Commissioner](#).

10. OBLIGATION TO PROVIDE PERSONAL INFORMATION AND CONSEQUENCES FOR FAILING TO DO SO

Where we *need* to process your personal information either to comply with law, or to perform the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the functionalities of the Site).

11. AUTOMATED DECISION-MAKING

Your personal information will not be used for automated decision-making, including profiling.

12. THIRD PARTY LINKS

This Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your personal information. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every site you visit.

13. OUR POLICY ON CHILDREN

This Site is not intended for children below 16 and we do not knowingly collect data relating to such children.

14. CHANGES TO THIS PRIVACY POLICY

Changes to this privacy policy will be posted on our webpage here: </about/privacy.aspx>. We encourage you to visit our webpage regularly to keep yourselves updated on any such changes.

ANNEX A

SERVICE PROVIDERS WITH WHOM WE SHARE PERSONAL INFORMATION

Recipients	Category(ies) of personal information we share.	Why we share it	Location(s)
Netlify Inc	Identity Data Contact Data	If you send us contact and identity data or any other data via the contact form on http://cdmo.bavarian-nordic.com such data will be transferred to us via Netlify who hosts that website	Europe
Media Mechanics Inc.	Identity Data Contact Data	If you visit our website www.loweringtherisk.com we share information with Media Mechanics to enable them to provide us with that website solution.	Canada
Google Inc.	Identity Data Contact Data Professional Data	Google Inc. hosts our website www.loweringtherisk.com on a server in the U.S.	The United States