# **Olink Privacy Notice**

#### 1. Introduction

Olink Proteomics AB and its affiliates ("Olink", the "Company", or the "Group" of companies collectively) are committed to protecting the privacy of your personal information including any information that relates to your identification ("Personal Data"). In the normal course of our business activities, Olink acts as a processor or service provider to its customers. Such activities fall outside the scope of this "Privacy Notice" or "Notice".

This Notice applies to Personal Data collected by us or provided by you through the delivery of our products and services, on the Olink websites, during your interactions with Olink regarding inquiries, publications, meetings, events, office visits, recruitment, and in the context of other business and/or marketing activities. By providing your Personal Data to us, you agree that we may collect and use such personal information and other information in accordance with the terms and conditions of this Notice.

This Notice does NOT apply to individuals who donate biological materials to a third-party. In such cases, details of processing personal data will be set out in a separate third-party consent form, privacy notice(s) and/or subject to IRB-approved research protocols, additional legal, regulatory, or oversight governing the collection and processing of such data.

Olink may make amendments to this Notice as necessary, in light of new Personal Data processing obligations, and/or to abide by applicable laws or regulations. You will find contact details for Olink at the bottom of this Notice should you have any questions.

#### 2. Personal Data We Collect and Process

In the sections below we describe the categories of Personal Data we process as a Data Controller:

Information that we collect directly from individuals and the parties with which we do business

- Contact information such as name, address, telephone number, email address, log-in credentials, details about the services for which you have engaged us, company/employer information, and similar information.
- General identification information such as name, address, telephone number, email address (and, if relevant, professional background and IP address) which is collected when interacting with us by:
  - o using Olink's websites or social media, including when you register and maintain an account on any Olink platform;
  - engaging in general correspondence;
  - visiting our offices;
  - Registering and participating in an Olink event, downloading or receiving publications or content, receiving marketing communications and details about how you engage with our marketing communications.
- Information that is related to a person interested in seeking employment at Olink. This information includes name, address, telephone number, email address, professional background and similar information.
- Olink may also process other types of Personal Data that is provided to the Company generally including in connection with payment for services and billing information, external meetings or

marketing activities such as call recording data related to web-based technologies such as Zoom or Team meetings.

Information that we collect about individuals who do not interact with us directly

• Information about potential job candidates, such as when a recruiter contacts us about an individual who may become a candidate for a job at Olink.

# 3. How data is collected by Olink

Olink collects and processes Personal Data that is:

- provided to Olink in conjunction with an agreement regarding provision of services and sale of products, including registering and using an account with Olink related to the provision of analysis services.
- provided to Olink when someone communicates or interacts with the Company, e.g. when an
  individual contacts Olink for technical support or when someone signs up for a newsletter or
  other information from the Company.
- obtained from other sources, e.g. from cooperating partners or consortiums, public and commercial sources, third party databases, and different social media and marketing networks.
- obtained automatically from you and/or your device when using Olink websites.

### 4. How Olink Uses Your Personal Data and Lawful Bases for Processing

For Olink to process Personal Data, the processing must have a legal basis in accordance with applicable privacy legislation. We describe below how we use your Personal Data and the legal basis for such processing.

### 4.1. Provision and sale of our products and services

When Olink provides services and sells products, the Company processes Personal Data for Olink's 'legitimate interest' to enter into a contract, to perform our obligations under the contract and to manage the business relationship. Processing activities include handling of Personal Data relating to communication, handling of payments, dealing with complaints, technical troubleshooting, and other service and sales related matters.

### 4.2. Communication of services, products, and general inquiries

When you contact us, we process Personal Data to communicate with you and to fulfill your requests. The legal basis for the processing Personal Data for this purpose is Olink's 'legitimate interest' in communicating with you, assisting our customers, and informing you about new or improved services.

### 4.3. Operating our Websites

We use Cookies to allow our Website to operate, increase its functionality and efficiency, analyze how you use it so that we can improve it, tailor the content and information that we display to you, and provide you with targeted advertisements. The legal basis for use of Cookies is consent. You can read our Cookie Policy and manage your cookie preferences here: https://olink.com/cookies/

#### 4.4. Marketing purposes

Olink's direct marketing efforts process Personal Data to identify and evaluate prospective customers and collaboration partners. Olink also processes data to market our products and services. For these purposes, Olink may use your contact information to reach out to you, to market services and products, and/or determine whether you would like to have a business relationship with us. Olink does this kind of processing based on our 'legitimate interest' or, if provided, your prior consent. You may opt-out of marketing communications by declining to receive such emails when registering or in our subsequent communications by following opt-out instructions included in the email.

### 4.5. Job applications and Recruitment

Olink recruits candidates and processes job applications and related information to evaluate the candidate's skills and potential of obtaining employment at Olink and to potentially offer employment. The processing is necessary for Olink's 'legitimate interest' to recruit new employees; to prepare for or to perform a contract; to comply with a legal obligation; or in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law. If either Olink or a candidate wishes to save a person's application for future reference, such continued processing will have to be based on that person's 'consent'. You are entitled to revoke such consent at any time. You will find more information about how to withdraw consent within the recruitment tool "Team Tailor".

### 4.6. To comply with laws

Olink will process data to comply with applicable laws to which Olink is subject to, e.g. our legal obligations under applicable accounting and tax laws. The legal basis in this situation is that Olink needs to comply with legal obligations.

# 4.7. To establish, exercise or defend legal claims

Where necessary, Olink will use data for the establishment, exercise or defense of legal claims and to archive certain data (e.g. contractual matters) that may be relevant for future legal matters. The processing here is based on Olink's 'legitimate interest' in protecting its legal rights and interests.

#### 4.8 Your consent

On a limited basis, Olink may process your Personal Data based on your consent, which may be withdrawn at any time. Withdrawing your consent will not affect the lawfulness of our processing before you withdraw consent; it will also not affect the lawfulness of our processing of Personal Data performed on other lawful grounds.

### 5. Sharing of Personal Data

Olink does not sell your Personal Data. However, we do need to share your personal data as set forth below, to provide our products and services to you or to otherwise perform our business activities.

### 5.1. Companies in the Olink Group

Olink may share the Personal Data with other companies within the Olink Group for the purposes stated in this Notice. When Olink shares data with group companies outside EU/EEA, the Company has ensured that the level of protection is equivalent to that applicable in the EU/EEA by entering into contracts

based on the EU Commission's standard contractual clauses. You can read more and find a copy of the standard clauses on the supervisory authorities' websites.

5.2. Partners that assist us in providing our products or services or help support our marketing or recruitment administration

Olink shares Personal Data with third parties that perform services on our behalf to fulfil the purposes above. When Olink engages third parties to handle Personal Data the Company continues to be responsible for the processing of any such data by the third party. Such third party processors are instructed to only use data for particular purposes in data processing agreements.

#### 5.3. Public authorities

Olink may from time to time be obliged, based on law or a decision by a public authority, to provide Personal Data pursuant to such decision, e.g. to the police or the Swedish Authority for Privacy Protection. The legal basis for such processing is 'compliance with a legal obligation'.

#### 5.4. Others

Olink may disclose Personal Data to other third parties where it is necessary for the purposes set out in this Personal Data Notice, for audit purposes, or if you have requested that we share your information with a third party.

### 6. Transfers outside EU/EEA

Olink Proteomics is headquartered in Sweden, and maintains offices in other countries, such as the United States, China, Singapore and Japan. When Olink transfers Personal data outside EU/EEA, whether within the Olink group companies or to a third-party in countries not deemed by the European Commission to provide an adequate level of protection for Personal Data, the transfer will be made pursuant to appropriate safeguards, such as the EU Commission's standard contractual clauses or other mechanisms or legal grounds as may be permitted under applicable law.

# 7. How Long We Keep Your Personal Data

Olink will process Personal Data for as long as it is necessary to fulfill the purposes outlined in the Privacy Notice unless a longer retention period is required by law or other lawful legitimate purpose such as where data is archived for the protection of Olink's legal rights and interests (e.g. to enable us to resolve a potential future dispute).

Where we process Personal Data for marketing purposes, we process the information until you opt-out, allowing for time to implement your request. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your Personal Data so that we can respect your request in the future.

# 8. Rights of Individuals

If you are subject to an applicable data protection or privacy law, such as the GDPR, you have specific rights regarding the Personal Data we collect and process as Controller. This section provides an overview of the rights individuals have in relation to Olink's processing of their Personal Data as well as information about how to contact the Company to find out more.

### 8.1. Right of access

Individuals are entitled to ask us if we are processing their Personal Data, and if so, for a copy of the Personal Data Olink holds about you, as well as the purposes for which we process the data, for how long Olink will process the data and who will have access to the data as set out in this Privacy Notice. To receive such information, the individual may need to provide Olink with additional identification information. Olink may request specification of the information to be accessed.

# 8.2. Right to object

Where our reason for processing your personal data is legitimate interest you may object to processing as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. When Olink receives an objection to processing for the purpose of direct marketing, Olink will stop processing the requesting person's Personal Data for that purpose. If there is no compelling legitimate ground for Olink's processing at the time of an objection, the Company will cease the processing and delete the Personal Data unless it necessary for another purpose based on a separate legal basis.

### 8.3. Right to rectification

If any Personal Data we hold about you is incomplete or inaccurate, you can require us to correct or supplement it, though we may need to verify the accuracy of the new data you provide to us. When Olink has rectified such personal data, the Company will contact any third parties to which Olink has disclosed the data and inform them about what rectifications have been made. Contact with third parties will not be made if it is deemed too burdensome for Olink or unless it is impossible to do this for some other reason.

# 8.4. Right to be forgotten

You can ask us to delete or remove Personal Data in certain circumstances, e.g. where the personal data is no longer necessary in relation to the purpose for which it was collected, when someone objects to the processing and there are no overriding legitimate grounds, or if the data has been unlawfully processed.

#### 8.5. Right to restriction

You are also entitled in certain cases, to have the processing that we carry out restricted. 'Restriction' means that data is marked so that it is only processed for certain limited purposes going forward. The right to restriction applies, for example, when you want us to establish the data's accuracy and you have requested rectification; where our use of your personal data is unlawful but you do not want us to delete it; where you need us to retain your data for a specific period because you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

# 8.6. Right to data portability

The right to portability only applies to data provided by you that we process by automated means (not paper files) and based on your consent or to perform a contract with you. Where it is possible, this right

means that individuals are entitled to receive the data they have provided to Olink and to transfer it to another controller.

# 8.7. Right to withdraw consent

In some cases, the processing Olink carries out may be based on the data subject's consent. In such cases, you can, at any time, withdraw consent that has been given. The right to withdrawal does not apply to processing based on other legal bases and Olink may continue to perform certain processing of Personal Data even if an individual withdraws its consent.

### 8.8. Right to lodge a complaint

You have a right to lodge a complaint regarding our processing of your data with the Swedish Authority for Privacy Protection, Box 8114, SE-104 20 Stockholm, Sweden (or your own national EU/EEA supervisory authority for privacy protection). The contact details for each national EU/EEA data protection authority can be found at https://edpb.europa.eu/about-edpb/about-edpb/members\_en. If you are located in the UK, you also have a right to make a complaint to the ICO.

### 9. How We Protect Your Personal Data

We maintain organizational, technical, and physical safeguards to help protect the Personal Data we collect and use from accidental loss, unauthorized access, use, alteration, and disclosure. These safeguards vary depending upon a variety of factors including the sensitivity of the information we collect and use.

### 10. How to Contact Us

Olink has appointed a Data Protection Officer. You may contact our Data Protection Officer at integrity@olink.com with questions about Olink's processing of Personal Data or if you wish to exercise any of the rights set out above.

This version of our Privacy Notice is effective as of June 05, 2024.