



Olink Personal Data Notice

1. Introduction

This Notice describes how Olink Proteomics AB and its affiliates (“**Olink**” or the “**Group**” of companies collectively) handle (“**process**”) information about individuals (“**personal data**”) that come in contact with Olink, including data about Olink’s customers, prospects, suppliers, researchers, job applicants or other parties.

When Olink determines why and how such processing of personal data it is the “**Controller**” for the data processed.

When Olink process personal data on behalf of customers the company instead is a “**Processor**” for activities when the company handles personal data such as when Olink provides services to customers (see 9 below).

This Notice primarily describes how and for what purposes Olink processes personal data as the Controller. Other than as specifically set out below, this Notice does not describe how Olink process personal data in when acting as a Processor.

You will find contact details to Olink at the bottom of this Notice.

If Olink makes amendments to this Notice, they will be a published [version here](#), where older versions of the Notice are available for review.

2. Types personal data being processed

In general, and to the extent necessary, Olink collects and processes the following categories of personal data:

- Information that is related to individuals that are acting on behalf of an entity (for example a university or company) that is engaged with Olink in some manner. This includes names, addresses, telephone numbers, email addresses, details about the services for which you have engaged us and also your professional background.
- Information handled in conjunction with individuals’ expressions of interest in Olink’s services and products generally. This information includes name, address, telephone number, email address and, if relevant, professional background.
- Information that is related to a person interested in seeking employment at Olink. This information includes name, address, telephone number, email address and, if relevant, professional background.
- Olink may also process other types of personal data that is provided to the company generally including in connection with external meetings or marketing events.

3. How data is collected by Olink

Olink collects and processes personal data:

- That has been provided to Olink in conjunction with an agreement regarding provision of services and sale of products.

- That has been provided to Olink when someone communicates 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.
- That has been obtained from other sources, e.g. from cooperating partners, third party databases and different social media and marketing networks.
- That Olink collects due cookies on the company websites that collect information from your web browser.

4. How do we use the data?

For Olink to be allowed to process personal data, the processing must have a legal basis in accordance with applicable privacy legislation. Below the purposes for which Olink may process personal data is listed along with the legal basis for such processing.

4.1. Provision of services and sale of products

When Olink provides services and sells products, the company processes personal data in order 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 sale-related matters. The legal basis for the processing of data under this item is Olink's 'legitimate interest' in providing our services and selling goods up.

4.2. Communication about services and products

When Olink communicates about its services and products it will process personal data, e.g. when an individual contacts the company or provides feedback about services or products. Based on an individual's use of Olink services or products, the company may provide that individual with recommendations about its use of service results or a product, e.g. to inform about new services/products or improvements to current ones. The legal basis for the processing personal data for this purpose is Olink's 'legitimate interest' in assisting customers and informing about new or improved services.

4.3. Development of services and products

To the extent allowed Olink assesses of customer analysis data with a view to improving company products and services, to develop new services, increase product portfolios and improving work methods. Olink carries out such processing by compiling statistics from the data. Olink removes all connection to individuals to anonymize any personal data for the above-mentioned purposes. The legal basis for the processing of customer data described above is Olink's 'legitimate interest' in developing and improving its services and products.

4.4. Research needs analysis and marketing purposes

Olink process personal data to analyze needs of researchers and interests in order to find and evaluate prospective customers and collaboration partners. Olink also process data to better market our products and services. For these purposes, Olink may reach out to individuals e.g. by way of email about potential projects or collaborations or simply to market services and products. Olink does this kind of processing based on our 'legitimate interest' in analyzing and discovering new business opportunities and marketing our services and products.

4.5. Job applications

Olink process job applications to evaluate the applicant's skills and potential of obtaining employment at the company and to potentially offer employment. The processing is necessary for Olink's 'legitimate interest' in recruiting new employees.

If either Olink or an applicant 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 below under the heading 'Withdrawing consent'.

4.6. To comply with laws

Olink will process data to comply with applicable laws that the company 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.

5. Sharing of personal data

Olink may share individual's personal data in the situations listed below.

5.1. Companies in the Olink Group.

Olink may share 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 clauses [here](#) and more information is available on the supervisory authorities' websites.

5.2. Processors and sub-processors

Olink shares personal data with third parties that perform services on our behalf (e.g. suppliers of IT-services), in order 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 personal data by the third party. Such third party "sub-processors" are always 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

Personal data may be transferred outside EU/EEA under certain conditions. The EU Commission has approved certain countries outside the EU/EEA that have a sufficient high level of protection for personal privacy by way of adequacy decisions for those countries. If personal data is transferred to a country outside the EU/EEA that does not have an adequacy decision, the transfer must be subject to appropriate safeguards, such as the EU Commission's standard contractual clauses for such transfer. Olink always ensures that appropriate safeguards are in place before any transfer of personal data to

outside the EU/EEA is made.

7. How long personal data is stored

Olink will process personal data for as long as it is necessary considering the purpose of the processing and what has been agreed when applicable. Personal data will be stored for varying periods of time depending on the purpose of the processing and the contractual situation as applicable. Certain data must be stored for a certain period of time due to applicable legislation and other data is archived for the protection of Olink's legal rights and interests (e.g. to enable us to resolve a potential future dispute).

8. The rights of individuals

Below follows 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 know what we do with their personal data, the purposes for which we process the data, for how long Olink will save it and who will have access to the data as set out in this Personal Data Notice.

Generally, everyone has the right to receive a copy of their personal data, and other supplementary information in accordance with article 15 GDPR. To receive such information, the individual may need to identify him- or herself depending on the types of personal data Olink stores. If Olink stores large quantities of personal data, Olink may request specification of the information to be access.

8.2. Right to object

Everyone has the right to object to processing of their personal data based on the grounds "public interest" or "legitimate interests". This effectively allows a person to stop or prevent processing of their personal data. A data subject may also object to processing of personal data for "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 of the data Olink processes is inaccurate or if more information needs to be processed considering the purpose for which the company processes data, individuals are entitled to have such inaccurate data rectified or to supplement it with such further data that may be needed for the processing. 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

Everyone is entitled to have their personal data erased in certain circumstances, e.g. where the personal data is no longer necessary in relation to the purpose for which they were collected, when someone objects to the processing and there are no overriding legitimate grounds or the personal data have been unlawfully processed.

8.5. Right to restriction

In accordance with article 18 GDPR, 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 consider that data is inaccurate and you have requested rectification. In such cases, you may also request that the processing of the data is restricted while we are investigating whether the data is correct. When the restriction ceases, we will inform you about this.

8.6. Right to data portability

Everyone is entitled to 'data portability' for the data that has been submitted to Olink in the event that the company carries out the processing based on consent or when we process data to perform a contract. This means that individuals are entitled to receive the data they have provided to Olink and whose data the company is processing and transfer this to another controller. The right to portability only applies to data that we process by automated means. This means that data only processed in paper files is not covered by the right to portability.

8.7. Right to withdraw consent

In some cases, the processing Olink carries out may be based on the data subject's consent. Before consent can be given the individual must have received detailed information about the processing in connection with Olink asking for consent.

Everyone is entitled to, at any time, withdraw consent that has been given. An individual may withdraw a consent in the same manner that it gave the consent. The right to withdrawal does not apply to processing based on other legal bases than consent 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.

9. Processor – Sensitive personal data

When Olink processes personal data during the performance proteomic analysis services and biostatistical services, the company does it based on instructions from its customers in capacity as a Processor. Olink is responsible for this processing according to applicable law and the instructions of a contract, or data processing agreement, with the customer.

The analysis data generated during analysis services contains information about the health state of the persons that have donated the analyzed samples. Health data is sensitive personal data. Based on the principle of data minimization all samples that Olink receives must be pseudonymized or fully anonymized before the company receives them. Pseudonymization means that it shall not be possible to directly link the personal data to an individual without further information (e.g. a key corresponding to the samples key code) to which Olink shall have no access. Anonymized samples contain no indirect link to the donors and the analysis data is not personal data anymore. This means that Olink will not process more data than what is necessary for each service and that the data obtained cannot be used for additional purpose(s).

When acting as Processor Olink has taken appropriate technical and organizational measures to, among other things, ensure data security in the form of access restrictions and in addition to the

above-mentioned pseudonymization.

10. Contact information

Olink has appointed a Data Protection Officer whose task is e.g. to monitor that the company's processing of personal data is performed in a lawful way. Anyone is welcome to contact our Data Protection Officer at integrity@olink.com if they have any questions about Olink's processing of personal data or wish to exercise any of the rights set out above.