

# COULTREON PRIVACY & COOKIE NOTICE

Last update: April 27, 2026

## 1 Introduction

This Coultreon Privacy & Cookie Notice (“**Notice**”) describes how Coultreon Biopharma BV (“**we**”, “**us**”, or “**our**”) collects, uses and protects your personal data when you visit our website (<https://www.Coultreon.com/>) or apply for employment opportunities with us.

We are committed to respecting your privacy and protecting your personal data in accordance with the applicable privacy and data protection laws, including the EU General Data Protection Regulation (“**GDPR**”).

## 2 Who is the Data Controller?

The data controller responsible for your personal data is:

Coultreon Biopharma BV  
Gaston Geenslaan  
3001 Leuven  
Belgium  
[dpo@coultreon.com](mailto:dpo@coultreon.com)

## 3 Job Applicants

### 3.1 Personal Data We Collect About You

If you apply for a position with us by sending an email to our email address, we may collect and process the following personal data:

- Full name
- Contact details (e.g. email, phone number, etc.)
- Hiring data (e.g. resume, cover letter, academic qualifications, prior work history, etc.)
- Other information you choose to provide to us.

### 3.2 Legal Basis for Processing

We may process your personal data on the basis of:

- **Legitimate interests** (Article 6(1)(f) GDPR): to assess your suitability for future employment opportunities within our organisation.
- **Pre-contractual steps** (Article 6(1)(b) GDPR): to review and process your application in order to take steps at your request prior to entering into a potential employment contract.

### 3.3 How We Use Your Personal Data

We use your personal data to:

- Assess your qualifications and suitability for positions within our organisation
- Contact you regarding potential employment opportunities
- Maintain a database of potential candidates for future vacancies
- Comply with our legal obligations.

### 3.4 Data Retention Period

We will retain your personal data for a period of 24 months from the date of your application. This retention period allows us to consider you for suitable vacancies that may arise during this time, whilst remaining compliant with data minimisation principles under the GDPR.

After this period, your data will be securely deleted, unless:

- You have been employed by us (in which case different retention periods apply)
- We have a legal obligation to retain the data for a longer period
- You provide your consent for us to retain your data for a further period.

### 3.5 Personal Data Sharing

Your personal data may be disclosed internally within Coultreon Biopharma. We take precautions to limit access to your personal data to only those who have a legitimate business need-to-know to perform their tasks and duties.

We may also disclose your personal data with certain trusted third parties, including:

- **Consultants:** We engage external consultants who work with us on a self-employment basis to support various business functions. These individuals may have access to applicant data where necessary for their work with our organisation.
- **Service providers:** We engage third-party service providers to support our business operations, such as IT service providers, cloud storage providers, email service providers, recruitment and hiring service providers, etc. These service providers act as data processors and process your data only on our behalf and in accordance with our instructions.
- **Professional advisers:** Including legal advisers and auditors who are bound by confidentiality obligations
- **Legal and regulatory authorities:** Where necessary to comply with our legal obligations.

We make sure that any person acting under our authority and having access to your personal data only processes your data in accordance with our instructions and have committed themselves to confidentiality.

### 3.6 International Data Transfers

Some of the third parties listed above who may receive your personal data may be located outside the European Economic Area (“**EEA**”).

Where we transfer your personal data outside the EEA, we ensure compliance with applicable GDPR requirements by implementing appropriate safeguards, including, e.g.:

- Transfers to countries recognised by the European Commission as providing adequate data protection (such as the United Kingdom)
- Standard Contractual Clauses approved by the European Commission for transfers to other third countries
- Additional technical and organisational security measures where necessary.

You may obtain a copy of the relevant transfer mechanisms we have put in place by contacting us at [dpo@Coultreon.com](mailto:dpo@Coultreon.com).

## 4 Website Visitors and Cookies

### 4.1 What are Cookies?

Cookies are small text files that are placed on your device when you visit a website. They help us enhance website functionality, remember your preferences, and analyze site usage.

## 4.2 Cookies We Use

Our website uses only analytical and essential cookies to help us understand how visitors use our website and to protect against security threats. We do not use any marketing, advertising, or tracking cookies.

We use the following cookies:

Cookie Name	Type	Purpose	Duration	Legal Basis
crumb	Strictly necessary	Security – protects against Cross-Site Request Forgery (CSRF) attacks and ensures secure form submissions	Session	Legitimate interests (Article 6(1)(f) GDPR) – essential for website security
ss_cvr	Analytical	Analytics – tracks conversion events and user interactions to help us understand website performance	14 months	Consent (Article 6(1)(a) GDPR; ePrivacy Directive)
ss_cvt	Analytical	Analytics – tracks conversion timestamps to measure website effectiveness	30 min	Consent (Article 6(1)(a) GDPR; ePrivacy Directive)

## 4.3 Cookie Consent

When you first visit our website, you will be presented with a cookie banner requesting your consent to place analytical cookies on your device.

**Strictly Necessary Cookies:** These cookies are essential for the security and proper functioning of our website. They do not require your consent as they are strictly necessary to protect you and our website from security threats.

**Analytical Cookies:** For analytical cookies, you can:

- **Accept** analytical cookies
- **Reject** analytical cookies
- Manage your preferences through our cookie settings.

Our website will function without analytical cookies, though we will not be able to analyse and improve our website performance without them. The security cookies will always be placed as they are essential for website security.

## 4.4 Managing and Deleting Cookies

You can manage or delete cookies through your browser settings. Please note that disabling cookies may affect the functionality of this and many other websites you visit.

For information on managing cookies in common browsers, please visit:

- **Chrome:** <https://support.google.com/chrome/answer/95647>
- **Firefox:** <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- **Safari:** <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>
- **Edge:** <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

## 4.5 Data Collected Through Cookies

The analytical cookies we use may collect:

- Pages visited on our website
- Time spent on pages
- Referring website
- Browser type and version
- Device type
- IP address (anonymised where possible)
- Conversion events and timestamps.

This data is used solely to analyse website performance and improve user experience. We do not use this data to identify individual visitors.

## 4.6 Data Retention for Cookie Data

Please see the “Duration” under Section 4.2.

## 4.7 Third-Party Access

Cookie data may be processed by our trusted third party service providers, such as our website platform developer, who act as data processors on our behalf and are bound by data processing agreements, ensuring GDPR compliance.

# 5 How We Protect Your Personal Data

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction. These measures include:

- Encryption of data in transit and at rest
- Access controls and authentication procedures
- Regular security assessments
- Staff training on data protection.

# 6 Your Rights

Subject to applicable privacy and data protection laws, you may have certain rights regarding the personal data we hold about you. We support the exercise of these rights.

You have the right to request access to your personal data, to have it rectified or erased, to object to its processing or have it restricted. You may also have the right to receive a copy of your personal data, to have your personal data sent to another party (portability) and/or the right not to be subject to any decision that significantly affects you and is taken solely by automated processing, including profiling.

We will process all requests in a timely manner in line with applicable laws. You should make such requests in writing, by e-mail to the address mentioned in the [“How to contact us?” section](#) below. We may ask you for additional information to confirm your identity before actioning your request.

In certain instances, privacy and data protection laws may allow us to legitimately refuse your request (e.g., to protect the rights of third parties or if you have asked us to delete information which we are required by law or have compelling legitimate interests to keep).

If you have any concerns, or if you believe that your privacy or data protection rights have been infringed, you may lodge a complaint with the relevant supervisory authority with responsibility for enforcing privacy and data protection laws:

- In the UK, the supervisory authority is the Information Commissioner's Office (ICO):  
<https://ico.org.uk/make-a-complaint/>

- For other EU member states, please visit: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## **7 How to Contact Us?**

We welcome any questions or comments you may have regarding this Notice or its implementation. Any such questions, comments or requests should be submitted to [dpo@coultreon.com](mailto:dpo@coultreon.com) or by regular mail to:

Coultreon Therapeutics NV  
Gaston Geenslaan 3  
3001 Leuven  
Belgium

## **8 Changes to This Notice**

We may update this Notice from time to time to reflect changes in our practices or legal requirements. We will notify you of any material changes by posting the updated Notice on our website with a revised "Last update" date.