

	PRIVACY NOTICE OF DARK ANTIGEN ACCORDING TO ART. 13 / 14 OF UE REGULATION 2016/679 (GDPR)

1. Data (Join) Controller and DPO

Data Join Controller is NEC Laboratories Europe GmbH, Kurfürsten-Anlage (NLE) 36, D-69115 Heidelberg e-mail: privacy@neclab.eu.

The Controller appointed a Data Protection officer that can be contacted at this e-mail address: dsb@neclab.eu

Data Joint Controller is NEC OncoImmunity AS, Norway: gdp@oncoimmunity.com

2. Information on data processing

Data are collected from Scientific Databases and Biobanks. NLE is not able to identify or contact any of the data subjects (data are relatively anonymous to us).

Categories of Personal Data and source	Purpose of processing	Legal basis of data processing	Data retention
Special Category of Personal data: Health Data.	Scientific research is aimed to the discovery of shared neoantigens derived from the so-called dark genome, i.e., regions that are not investigated normally for vaccine designs. The research will be conducted as collaboration between NEC Laboratories Europe GmbH and NEC OncoImmunity AS to distribute the work according to expertise and available resources.	Art. 6 (1) (f) Legitimate interest to perform scientific research with pseudonymized retrospective data. Art. 6 (1) (a) Consent Privilege for scientific research. Art. 5 para. 1 lit. b. half sentence 2 GDPR in conjunction with Art. 9 para. 2 lit. j. GDPR.	Data will be retained up to 3 years.

3. Processing procedures

The Controller through its own authorized personnel carries out data processing. Appropriate technical and organizational measures are in place. Results of the experiments with ML do not enlarge the knowledge about any of the data subjects. Data Processing does not have a direct impact on the data subjects.

4. Data transfers outside the European Economic Area ("EEA")

If personal data are required to be transferred outside the European Economic Area ("EEA") the Controller will put in place appropriate safeguards to ensure that personal data are adequately protected at the recipient location by ensuring that the data are transferred to a country that provides a level of protection equivalent to that provided by the GDPR. No data transfer is envisaged.

5. Data Subject Rights

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Data subject may exercise his/her rights at any time, and in particular:

- confirmation of whether or not personal data concerning him/her are being processed and to obtain access to the data and the following information: purpose of processing; categories of personal data; recipients; storage period; existence of the right to rectification, cancellation and limitation; origin of data not collected from the data subject;
- the cancellation or rectification of inaccurate personal data concerning him/her and/or the integration of incomplete personal data if he/she so wishes, also by providing a supplementary declaration;
- the limitation of processing consisting in the blocking of data processing for the period necessary for the required verifications in the hypotheses foreseen by the regulations in force;
- the portability of the data provided to the Controller including the direct transmission of the data to another data controller, the Controller shall deliver the personal data available on electronic format for common use to allow migration to other media;
- opposition at any time to processing based on the legitimate interest of the Controller;
- revocation of consent, where the processing is based on such legal basis.

6. Exercise of data subject's rights and complaints

Data subject may exercise his/her rights at any time by contacting the Controller by sending an email to the Controller without any formality or payment of any additional cost: privacy@neclab.eu. Every request received by the Controller will be taken into consideration after verifying the identity of the person entitled and safeguarding the rights of third parties. Requests will be satisfied as soon as possible and in any case within thirty days, except in the case of objective difficulties which will be communicated in writing within this period. In case of dissatisfaction on the modalities of processing and complaints and for any clarification data subject may write to the Controller, without prejudice to his right to apply to the Authority responsible for the protection of personal data: Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg.

18.01.2025

The Controller - NEC Laboratories Europe GmbH