Privacy Notice for Clinical Trials – EU, UK, and Swiss Clinical Trial Participants

Kriya Therapeutics, Inc. ("Kriya") is committed to protecting the Personal Data we process for the purpose of conducting clinical trials. This Privacy Notice sets forth the privacy principles and procedures as well as the technical security measures we follow to keep Clinical Trial Data private and secure.

Kriya is subject to applicable privacy and data protection laws where we process Personal Data or monitor the behavior of data subjects who are in the European Union (EU), United Kingdom (UK) and Switzerland.

In the EU, clinical trials are also subject to the Clinical Trials Directive 2001/20/EC and the Clinical Trials Regulation 536/2014/EU, which have specific requirements regarding informed consent for participating in clinical trials (more on consent below). Kriya will also comply with applicable EU member state legislation.

This privacy notice is for data subjects participating in trials in the EU, UK, and Switzerland. Data subjects participating in trials outside of these areas should refer to the Privacy Notice for data subjects here: https://kriyatherapeutics.com/privacy-notice/

Kriya and Clinical Trial Data

Kriya does not collect Clinical Trial Data directly from individuals during the course of our clinical trials. Instead, we receive Pseudonymized Data from the clinical trial sites through the Contract Research Organizations ("CRO") and service providers that we engage to carry out the study.

Investigators enrolling Clinical Trial Participants in the study will provide information about the trial, how Personal Data will be managed and protected, and a link to this Privacy Notice at the time of enrollment.

If you are participating in a clinical trial and have questions about the Processing of your Personal Data, please contact the physician or the hospital that enrolled you in the trial as indicated in the Informed Consent Form.

Kriya cannot identify you personally from the Clinical Trial Data we hold, given we only collect Pseudonymized Data. You can contact Kriya's Data Protection Officer directly, but that will result in the loss of the protection afforded by the pseudonymization process used to protect your Personal Data. If you prefer to maintain the pseudonymization, you should contact physician or the hospital that enrolled you in the trial as indicated in the Informed Consent Form and ask them to contact the Kriya's data protection officer on your behalf.

Data Protection Officer

Kriya's Data Protection Officer is responsible for overseeing our compliance with the EU data protection law.

Data Protection Officer
1219 Shiloh Glenn Dr
Durham, NC 27703
United States of America
E: dpo@kriyatx.com

Member Representative in the EU: DataRep

If you want to raise a question to Kriya Therapeutics, Inc., or otherwise exercise your rights in respect of your personal data, you may do so by:

- Sending an email to datarequest@datarep.com quoting "Kriya Therapeutics, Inc." in the subject line,
- Contact DataRep via online webform at www.datarep.com/data-request, or
- Mail your inquiry to:

  If you are in the EU/EEA, you can contact DataRep by mail at:
  Calle de Manzanares
  4 Madrid, 28005, Spain

  If you are based in the UK, you can contact DataRep by mail at:
  107-111 Fleet Street
  London
  EC4A 2AB

Controller Information

Kriya Therapeutics, Inc.
1219 Shiloh Glenn Dr
Durham, NC 27703
United States of America
https://kriyatherapeutics.com

Scope

This Privacy Notice applies to Personal Data of data subjects in the EU, UK, and Switzerland that are received by Kriya in any format, including electronic and paper, and processed by Kriya and/or by partners and service providers ("Third Parties") on behalf of Kriya. Categories of third-party organizations and data recipients are described below.

Definitions

"Anonymous Data" is information which does not relate to an identified or identifiable natural person or Personal Data rendered anonymous in such a manner that the data subject is not or no longer identifiable. The GDPR does not concern the Processing of Anonymous Data.

"Clinical Trial Data" is the data collected and processed by Kriya for clinical trial purposes. It includes Pseudonymized Data received from third parties as well as new data generated by Kriya and third parties based on data collected for the clinical trial. These new data may not relate to an identified or identifiable natural person.

"Clinical Trial Participant" means an individual participating in a clinical trial and providing Personal Data to third parties Kriya has contracted with to conduct the study. Clinical Trial Participant has the same meaning as "Data Subject" under Article 4 of the GDPR.

"Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors

specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

"Processing" means any operations or set of operations performed on Personal Data. It includes the collection, use, and disclosure of Personal Data as defined by applicable laws.

"Pseudonymized Data" means Personal Data that can no longer be attributed to a specific individual without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the Personal Data are not attributed to an individual. Kriya will protect Pseudonymized Data subject to the GDPR with the same care and high standards as Personal Data.

Purposes for Processing Personal Data

Personal Data of individuals participating in clinical trials will be processed for the purpose of scientific research into the effects of medical treatment.

Categories of Information Processed

The Personal Data processed depends upon the specifics of the clinical study and is described in detail in the Informed Consent Forms. These are examples of categories of Personal Data that are usually processed for a clinical trial:

Common personal details:

- Participant identifier (unique ID#)
- Location data - country, clinical trial site
- Personal details - year of birth, age in years, sex

Special categories of data:

- Health data
    - Physical details - height, weight, Body Mass Index (BMI)
    - Childbearing status
    - Physical health data
    - Psychological details - quality of life rating
    - Mental health data
    - Genetic data related to genetic research
- Data revealing racial or ethnic origin

Legal Basis for Processing Personal Data

Clinical Trial Data for research purposes

All Processing operations purely related to research activities in the context of the clinical trial will be carried out on the basis of legitimate interests for common Personal Data (Article 6(1)(f)) and scientific purposes for special categories of data (Article 9(2)(j)). Kriya has a legitimate interest in Processing the common Personal Data for scientific and statistical purposes related to the clinical trial and will ensure the appropriate protections are in place.

Clinical Trial Data for reliability and safety purposes

Processing operations expressly provided by the EU clinical trial law and by relevant national provisions and which are related to the protection of health while setting standards of quality and safety for medicinal products by generating reliable and robust data will be based on Kriya's legal obligation (Article 6(1)(c)) and on a public interest in

the area of public health (Article 9(2)(i)). This includes Processing records respecting adverse events.

Genetic data for research purposes
Genetic data for the purpose of genotype/biomarker assessment will be processed based on scientific purposes (Article 9(2)(j)). Participation in this assessment is entirely voluntary. The decision not to participate in the assessment will not stop the data subject from participating in the rest of the study. Consent to participate in the genotype/biomarker assessment is collected and recorded during the enrollment process using an Informed Consent Form.

Automated Processing

During the course of the Clinical Trial, Kriya will not make decisions regarding data subjects based solely on automated processing.

Categories of Third Parties and Data Recipients

Kriya contracts with a CRO to run trials based on the protocols, or "instructions", we have developed. The CRO selects investigators and clinical trial sites, processes Clinical Trial Data based on the protocol, and monitors the trial activities. CROs and third parties engaged by Kriya for the purposes of conducting a clinical trial are required by law and contractual undertakings to:

- Keep your Personal Data confidential and secure; and
- To use and disclose it for purposes that a reasonable person would consider appropriate in the circumstances, in compliance with all applicable legislation.

Categories of third parties that Kriya engages for clinical trials include:

- Contract Research Organizations
- Statistical Research Analysts
- Clinical trial sites
- Laboratories and other diagnostic partners
- Clinical advisors
- Technical providers for hosting and software services

Clinical Trial Data Transmitted to Third Countries

Kriya Therapeutics Inc. is located in United States of America. Clinical Trial Data from data subjects in the EU, UK, and Switzerland is processed in the EU, UK, Switzerland, US and other jurisdictions.

Your Personal Data will be transferred to these locations, but only for use by Kriya for the purposes described in this privacy statement. In each case, these transfers are subject to adequate safeguards as prescribed by law.

The list of processors Kriya uses for a specific trial is available upon request.

Transfer of Personal Data

Kriya transfers Personal Data on the basis of an appropriate legal mechanism:

1. The adequacy decision between the European Commission, or
2. The standard contractual clauses of the European Commission, Information Commissioner's Office (UK), Federal Data Protection and Information Commissioner (Swiss regulator), as appropriate for the transfer.

Retention

Kriya will retain Clinical Trial Data and will instruct third parties to retain Personal Data or Clinical Trial Data, depending on their role in the study, subject to applicable legislation.

The European Medicines Agency (EMA) and The UK Medicines and Healthcare Products Regulatory Agency (MHRA) require data retention for at least 25 years.
In Switzerland, The Swiss Agency for Therapeutic Products (Swissmedic) and Ethics Committees require a minimum retention period of 10 years.

Your Rights

Your rights related to the trial, including the right to withdraw consent, are described in the clinical trial Informed Consent Form.

Depending on the legal basis for Processing the Clinical Trial Data under the applicable law, rights related to the Personal Data of Clinical Trial Participants in the EU may include:

- Access to your Personal Data
- Right to rectification where Personal Data are incorrect or incomplete
- Right to restrict/suspend further Processing of Personal Data
- Right to data portability
- Right to withdraw consent
- Right to complain to a supervisory authority
    - EU supervisory authorities
    - UK supervisory authority
    - Swiss supervisory authority

The right to erasure will not apply to Processing that is necessary for Kriya to comply with a legal obligation, for a task carried out in the area of public health, or for scientific research purposes.

Please contact the physician or hospital that enrolled you in the clinical trial if you would like to exercise your rights related to your Personal Data collected for clinical trial purposes.

Where data subjects seek to exercise their rights related to their Personal Data, Kriya will provide support to exercise those rights. Kriya may not be able to comply with a direct request where Kriya is not in a position to identify you, for example where Kriya has received Pseudonymized Data.

Security Measures

We have taken appropriate technical and organizational security measures to protect Clinical Trial Data against unintentional or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and any other unlawful or unauthorized forms of Processing under applicable law.

We ensure confidentiality, integrity, and availability of data by controlling access, input, disclosure, security of availability, and its separation. In addition, we consider the protection of Clinical Trial Data when developing or selecting the hardware, software, and procedures used to process data.

Complaints

Please do not include any Personal Data (other than your contact information) or health information in the subject line or in the content of your message when contacting Kriya.

You may contact our Data Protection Officer at dpo@kriyatx.com with complaints regarding this Privacy Notice and Kriya's Processing of Clinical Trial Data.

Kriya will reply to complaints within 30 calendar days of their receipt and will attempt resolution in accordance with this Privacy Notice and applicable data protection laws.

You may lodge a complaint with the corresponding data protection supervisory authority in your country of residence. See 'Your Rights' section for relevant links.

Kriya may amend this Privacy Notice from time to time. We will post the date of the most recent changes and provide previous versions upon request. If we make significant changes, we will provide a more prominent notice (including email notification if appropriate).

Last updated: September 15, 2025