

Kriya Privacy Notice

Privacy Notice for Clinical Trials – Non-EU 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 legislation where some of our clinical trials are conducted.

This privacy notice is for data subjects participating in trials outside of the European Union (EU), United Kingdom (UK), and Switzerland. If you are participating in a clinical trial in the EU, UK, or Switzerland, please 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 Information 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 Information, please contact the physician or the hospital that enrolled you in the trial as indicated on 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 Privacy Officer directly, but that will result in the loss of the protection afforded by the pseudonymization process used to protect your Personal Information. 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.

Privacy Officer Information

Kriya's Privacy Officer is responsible for overseeing our privacy management program and compliance with privacy legislation.

Privacy Officer
1219 Shiloh Glenn Dr
Durham, NC 27703
United States of America
E: privacy@kriyatx.com
<https://kriyatherapeutics.com>

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Scope

This Privacy Notice applies to Personal Information that is received and processed by Kriya in any format, including electronic and paper for the purposes of conducting a clinical trial outside of the EU, UK, or Switzerland. More information about the third-party organizations we engage to conduct trials can be found 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. Privacy legislation 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 Information to third parties Kriya has contracted with to conduct the study.

"Personal Health Information" means, with respect to an individual, whether living or dead:

- a) Information concerning the physical or mental health of the individual;
- b) Information concerning any health service provided to the individual;
- c) Information concerning the donation by the individual of any body part or any bodily substance of the individual or information derived from the testing or examination of a body part or bodily substance of the individual;
- d) Information that is collected in the course of providing health services to the individual; or
- e) Information that is collected incidentally to the provision of health services to the individual.

Where Kriya is processing Personal Health Information under HIPAA, Personal Health Information includes Protected Health Information.

"Personal Information" means any information about an identifiable individual and includes Personal Health Information.

"Processing" means any operations or set of operations performed on Personal Information.

"Pseudonymized Data" means Personal Information and Personal Health Information that has been de-identified. This means it can no longer be attributed to a specific individual without the use of additional information. Personal Information will be considered pseudonymized provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the Personal Information is not attributed to an individual. Kriya will protect Pseudonymized Data with the same care and high standards as Personal Information.

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Collection of Personal Information

When individuals become Clinical Trial Participants, Personal Information will be collected and processed for the purpose of scientific research into the effects of medical treatment.

Consent

Kriya processes Clinical Trial Data based on your consent. The hospital or physician enrolling you in the trial will obtain your consent prior to the collection of your data using an Informed Consent Form.

Types of Information Processed

Kriya will pseudonymize the following data using a unique subject identification number:

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

Use and Disclosure

Kriya will use Pseudonymized Data for the purposes of conducting a clinical trial. We contract with a CRO to run a trial based on the protocols, or "instructions", we have developed. The CRO selects Investigators and study sites, processes Clinical Trial Data based on the protocol, and monitors the trial activities. CROs, partners, and service providers ("third parties") engaged by Kriya for the purposes of conducting a clinical trial are required by law and contractual undertakings to:

- Keep your Personal Information 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

The list of third parties that Kriya engages for a specific trial is available upon request.

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Location of Clinical Trial Data

Kriya Therapeutics, Inc. is located in the United States of America. Clinical Trial Data is processed in the U.S and other international jurisdictions based on your consent to do so, which is obtained on the Informed Consent Form.

Retention

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

Individual Access and Accuracy

Where Clinical Trial Participants have a right to access, correct, or update Personal Information, 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. This would occur where Kriya has received Pseudonymized Data or where Personal information has been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices.

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

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 Information collected for clinical trial purposes.

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.

Such measures include ensuring confidentiality, integrity, and availability of data by controlling physical access to the data, as well as the relevant access, input, disclosure, security of availability and its separation. In addition, we take into account the protection of Clinical Trial Data when developing or selecting the hardware, software, and procedures in line with the principle of data protection through technology and privacy by design.

Questions and Complaints

When contacting Kriya regarding any issue, please do not include any personal information (other than your contact information) or health information in the subject line or in the content of your message.

You may contact our Privacy Officer at privacy@kriyatx.com with questions or 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.

If our Privacy Officer is unable to resolve your concern, you may also contact your local privacy regulator.

[New Zealand](#)

Kriya Privacy Notice

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