

Disc Medicine, Inc.

Privacy Notice

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Who We Are

Welcome to the web site (the “Site”) of Disc Medicine, Inc. (“Disc Medicine,” “we,” “us,” and/or “our”). The Site is operated by Disc Medicine and has been created to provide information about our company and the services we offer to our Site visitors and users (“you,” “your”). This Privacy Notice (“Notice”) sets forth how we process and use information including personally identifiable data (“Personal Data”), and how you may exercise any rights you may have regarding our processing of your Personal Data. Disc Medicine, or any of its subsidiaries or affiliates (“Related Companies”), will be responsible for the collection and processing of your Personal Data (known in some jurisdictions as the data controller).

Scope of this Privacy Notice

This Notice applies to Personal Data collected or processed by us online (through the Site, email, and otherwise); when we process your Personal Data for your potential participation as a research subject in clinical trials; when we process Personal Data for your potential participation in clinical trials as an investigator or a member of the investigator team; when we process medical information in connection with pharmacovigilance and adverse events, complaints, and reports; and in other situations where you interact with us, including but not limited to interacting with or visiting our sites and offices or our events (e.g., tradeshow and conferences); when we process your data as an employee of a company with whom we conduct business; or anywhere this Notice is posted or referenced. This Notice also applies to Personal Data that is collected or processed when you interact with us in person, by telephone, or by mail.

- Disc Medicine may have other unique privacy notices that apply to certain specific situations, including informed consent forms for use in interventional and observational medical research. To the extent you were provided with a different privacy notice or policy and those policies or notices apply, those policies or notices will govern our interactions with you, not this one.
- If you provide us with Personal Data of anyone other than yourself (such as a patient or family member), please note that you are responsible for complying with all applicable privacy and data protection laws prior to providing that information to Disc Medicine (including obtaining consent, if required).
- Please review this Notice carefully. To the extent permitted by applicable law, by providing us your Personal Data or otherwise interacting with us, you are agreeing to this Notice.

Information Collected

“Personal Data” is any information—as electronically or otherwise recorded—that can be used to identify a person or that we can link directly to an individual, such as name, address, email address, telephone number, or credit card number, as applicable. Personal Data in some jurisdictions can include information that indirectly identifies a person, such as a unique number assigned to a patient by a Healthcare Provider or a clinical trial participant, even absent other identifying information.

Personal Data may include information considered sensitive in some jurisdictions, such as biometric information, genetic information, medical and health information, financial account information, geolocation, ethnic or racial origin, information concerning your sex life or your sexual orientation, and other information. Data that could be considered Sensitive Personal Data is highlighted with an caret (^) in the summary charts below.

We will process any Personal Data we collect in accordance with applicable law and as described in this Notice (unless, as explained above, a separate policy or notice governs). In some circumstances, if you do not provide us with your Personal Data, certain services may be unavailable to you.

Below is a summary of how we collect, process, and use Personal Data and the potential recipients of your Personal Data. Some jurisdictions require us to state the legal bases for processing your Personal Data, which are included below, but please note that not all jurisdictions may recognize all legal bases.

	Identity and contact information	Other personal information	Visual and audio information	Technical Information	Information regarding your treatment	Commercial and financial information	Professional and educational information	Inferences	De-identified data
	This may include name, email, phone number, etc.	This may include age, gender, date of birth, etc.	This may include still images, video, call recordings, etc.	This may include Internet Protocol (IP address, browser, device type, etc.	This may include blood and tissue samples, treatment date, etc.	This may include request documentation, financial transaction history, etc.	This may include job title or position, employer, etc.	Drawn from your Personal Data used to create a profile about you.	Data for which your individual personal characteristics have been removed****
Users of Online Services, Visitors at our Site(s), Visitors to our Physical Location and Events, Survey Participants, and Senders of Inquiries	X	X*	X	X*	X*			X	X
Business Partners and Their Employees, Agents, and Contractors	X	X*	X	X*		X*			X
Attendees and Participants at Events	X	X	X	X*			X	X	X
Clinical Investigators, Members of Investigator Teams, Health Care Providers, Business Partners and their Employees, Agents, and Contractors	X	X*		X*		X*	X	X	X
Clinical Study Candidates	X	X*		X*	X*			X	X
Employment and Apprenticeship Candidates	X	X*		X*			X	X	X

Personal Data that may be considered sensitive is noted with a “*”.

**Users of Online Services, Visitors to Our Site(s), Visitors to our Physical Location and Events,
Survey Participants, and Senders of Inquiries**

We may process your Personal Data when you: (1) use our Online Services and/or visit our Site(s); (2) attend events and/or visit our physical locations; and/or (3) submit inquiries to us or respond to us both online (e.g., via email) or offline (e.g., by written letters).

Examples of the types of data we process:	Where do we get the data?	Why do we process the data?	The legal bases for processing:	Who receives the data?
<p><i>Identity and contact information, such as:</i></p> <ul style="list-style-type: none"> • first and last name • email address • postal address • phone number • company/employer <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> • age • gender^ • marital status • disability^ • date of birth <p><i>Visual and audio information, such as:</i></p> <ul style="list-style-type: none"> • still images^ • video (including via CCTV)^ • recordings of your calls with our customer service representatives <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> • Internet Protocol (IP) addresses (which may identify your general geographic location or company) • browser type and browser language • device type • advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID)) • date and time you use our services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Site • activity on our Site and referring websites or applications • data collected from cookies or other similar technologies^ • geolocation information^ <p><i>Anonymized / De-identified Data</i> is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws***</p>	<ul style="list-style-type: none"> • you directly • your devices • our security systems (including CCTV) • third parties 	<ul style="list-style-type: none"> • to provide you with our services • to communicate with you (about your inquiry) • to administer our relationship with your organization • to send you updates • to identify and authenticate you • to customize content for you • to detect security incidents • to protect against malicious or illegal activity • to ensure the appropriate use of our services • to improve our services • for short-term, transient use • for administrative purposes • for marketing, internal research, and development • for quality assurance and to assist in training and development of our representatives 	<ul style="list-style-type: none"> • for the purposes of our legitimate interests • in preparation for or to perform a contract with you • in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law* 	<ul style="list-style-type: none"> • Disc Medicine and its Related Companies • partners that assist us in providing services or help us improve our marketing or administration**

Clinical Investigators, Members of Investigator Teams, Health Care Providers, Business Partners and their Employees, Agents, and Contractors

We may process your Personal Data if you are an existing or prospective clinical investigator, a member of an investigation team for a clinical study that Disc manages on behalf of a customer, a health care provider acting as a key opinion leader, or in your capacity as a business partner (such as a vendor, supplier, distributor, or service provider) of Disc Medicine.

Examples of the types of data we process:	Where do we get the data?	Why do we process the data?	The legal bases for processing:	Who receives the data?
<p><i>Identity and contact information, such as:</i></p> <ul style="list-style-type: none"> • first and last name • company/employer • email address • postal address • phone number • username and password <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> • age • gender^ • marital status • disability^ • date of birth <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> • Internet Protocol (IP) addresses • browser type and browser language • device type • advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID)) • date and time you use our services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Site • activity on our Site and referring websites or applications • data collected from cookies or other similar technologies • geolocation information^ <p><i>Commercial and financial information, such as:</i></p> <ul style="list-style-type: none"> • request documentation • customer service records • financial transaction history • financial account number^ <p><i>Professional and educational information, such as:</i></p> <ul style="list-style-type: none"> • job title or position • employer • National Provider Identifier number • state medical license number • work skills • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires • enrollment history for our education and training events <p><i>Anonymized / De-identified Data</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws***</p>	<ul style="list-style-type: none"> • you directly • your devices • our business partners and other third parties • our customers • your employer or principal 	<ul style="list-style-type: none"> • to provide you with services • to communicate with you (about your inquiry) • to administer our relationship with your organization • to send you updates • to communicate with you • to identify and authenticate you • to detect security incidents • to protect against malicious or illegal activity • to ensure the appropriate use of our services • to improve our services • for short-term, transient use • for administrative purposes • for quality assurance • for marketing, internal research, and development • for quality assurance • to customize content for you 	<ul style="list-style-type: none"> • for scientific or historical research or statistical purposes • to ensure high standards of quality and safety of healthcare and medical devices • for the purposes of our legitimate interests • to comply with a legal obligation • in preparation for or to perform a contract • to protect vital interests • in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law* 	<ul style="list-style-type: none"> • Disc Medicine and its Related Companies • other clinical investigators and/or members of investigator teams • partners that assist us in providing services or help us improve our marketing or administration**

Employment and Apprenticeship Candidates

We may process your Personal Data when you apply or are a candidate for employment or apprenticeship at Disc Medicine.

Examples of the types of data we process:	Where do we get the data?	Why do we process the data?	The legal bases for processing:	Who receives the data?
<p><i>Identity and contact information, such as:</i></p> <ul style="list-style-type: none"> • first and last name • company/employer • email address • postal address • phone number • username and password <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> • age • gender^ • marital status • disability^ • date of birth <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> • Internet Protocol (IP) addresses • browser type and browser language • device type • advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID)) • date and time you use our services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Site • activity on our Site, referring websites, or applications • data collected from cookies or other similar technologies • geolocation information^ <p><i>Professional and educational information, such as:</i></p> <ul style="list-style-type: none"> • job title or position • employer • work skills • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires <p><i>Anonymized / De-identified Data</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws***</p>	<ul style="list-style-type: none"> • you directly • your employer or principal • your devices • our business partners and other third parties 	<ul style="list-style-type: none"> • to communicate with you • to identify and authenticate you • to detect security incidents • to protect against malicious or illegal activity • for short-term, transient use • for administrative purposes • for marketing, internal research, and development 	<ul style="list-style-type: none"> • for the purposes of our legitimate interests • in preparation for or to perform a contract • to comply with a legal obligation • in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law* 	<ul style="list-style-type: none"> • Disc Medicine and its Related Companies • partners that assist us in providing services or help us improve our marketing or administration**

Clinical Study Candidates

We may process your Personal Data to determine whether you are interested in or would be a candidate for clinical studies sponsored by us or conducted by us on behalf of a third party.

Examples of the types of data we process:	Where do we get the data?	Why do we process the data?	The legal bases for processing:	Who receives the data?
<p><i>Identity and contact information, such as:</i></p> <ul style="list-style-type: none"> • first and last name • email address • postal address • phone number <p><i>Other personal information, such as:</i></p> <ul style="list-style-type: none"> • age • gender^ • marital status • disability^ • date of birth <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> • Internet Protocol (IP) addresses • browser type and browser language • device type • advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID)) • date and time you use our services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our services • activity Site, and referring websites or applications • data collected from cookies or other similar technologies^ • geolocation information^ <p><i>Information regarding your health, such as:</i></p> <ul style="list-style-type: none"> • date of birth • sex/gender^ • genetic information^ • identification of pathologies/diseases^ • areas of interest in medical research • treatment dates^ • medical history and treatment information^ • X-rays, magnetic resonance imaging, and medical scans^ • user activity^ • therapy completion and use details^ <p><i>Anonymized / De-identified Data</i> is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws***</p>	<ul style="list-style-type: none"> • you directly • your Healthcare Provider • your devices • our business partners and other third parties • your friends or family 	<ul style="list-style-type: none"> • to communicate with you (about your inquiry) • to administer our relationship with you • to send you updates • to determine your eligibility in one or more clinical studies • to identify and authenticate you • to detect security incidents • to protect against malicious or illegal activity • to ensure the appropriate use of our services • to improve our services • for short-term, transient use • for administrative purposes • for quality assurance 	<ul style="list-style-type: none"> • for the purposes of our legitimate interests • in the public interest • to comply with a legal obligation • in preparation for or to perform a contract • to protect vital interests • in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law* 	<ul style="list-style-type: none"> • Disc Medicine and its Related Companies • our customers • Healthcare Providers • clinical investigators and/or members of investigator teams • partners that assist us in providing the Products or Services or help us improve our marketing or administration**

Clinical Study Participants

We may process your Personal Data when you participate in a clinical study sponsored by us or conducted by us on behalf of a third party.

If you are a participant in a clinical study, clinical trial, or other health-related research, you should receive a separate privacy notice regarding the Personal Data we process for those purposes. That privacy notice—and not this Notice—governs our processing of such Personal Data.

*The legal bases relied upon by Disc Medicine under the European Union's General Data Protection Regulation ("GDPR") include those enumerated in Articles 6 and 9, depending on the type of Personal Data.

**There are certain circumstances in which we may share your Personal Data with certain third parties. Those limited circumstances may include, (1) in the event of a sale, assignment, or transfer, to the buyer, assignee, or transferee; (2) to the extent we hire agents, consultants, or third parties to perform certain business-related functions; and, (3) government or regulatory officials, law enforcement, courts, public authorities, or others when permitted by this Notice or required by law.

***We will not attempt to re-identify you or anyone else from this Anonymized Data / De-identified Data, and if we disclose it to third parties, we will require that they commit to not attempting to re-identify you or anyone else from the Anonymized Data / De-identified Data. Anonymized Data / De-identified Data includes health information resulting from the removal of identifiers from protected health information required under the Health Insurance Portability and Accountability Act, 45 CFR § 164.514(b)(2). Please note that in the course of research, study doctors and authorized personnel may still have access to named subject records collected for such research. This includes in the United States the removal of identifiers from protected health information required under the Health Insurance Portability and Accountability Act ("HIPAA"), 45 CFR § 164.514(b)(2), for such data to be considered deidentified. In the course of research, study doctors and authorized personnel may still have access to named subject records collected for such research.

****Each marketing communication we send you will contain instructions permitting you to "opt-out" of receiving future marketing communications. In addition, if at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us at: privacy@discmedicine.com.

Consumer Health Data

The law of the state in which you reside or in which your Personal Data is collected may make specific requirements in connection with Personal Data that is linked or is reasonably capable of being linked to you and that identifies your past, present, or future physical or mental health status ("**Consumer Health Data**").

To the extent your Personal Data constitutes "Consumer Health Data," the categories of Consumer Health Data being collected; the manner in which it will be used; the categories of sources from which it is collected; the categories of third parties and affiliates with whom it is being shared; the purposes of collecting, using and sharing it; and the manner in which it will be processed are all provided in the "Information Collected" section of this Notice. Additional information about Disc Medicine's activities can be found in the "Cookies or Similar Technologies" and "Third-Party Service Providers" sections of this Notice.

To the extent that the state in which you live requires us to provide certain rights to you in connection with your Consumer Health Data, we will provide the following rights to you based on your state's law:

- To request our confirmation that we are collecting, sharing, or selling your Consumer Health Data;
- To request to review and to make changes to any of your Consumer Health Data;
- To request that we delete your Consumer Health Data;
- To request a list of all third parties with whom we have shared or sold your Consumer Health Data;
- To request that we stop collecting, sharing, or selling your Consumer Health Data;
- To exercise any of these rights, follow the procedure explained in the "Your Rights Regarding Your Personal Data" section of this Notice.

A third party may collect Consumer Health Data over time and across different websites or online services when you use any of our websites or Online Services. For more information, see the "Cookies and Similar Technologies" and "Third-Party Service Providers" sections of this Notice.

This section (and the Notice more generally) is effective as of the "Last Updated" date above. We will notify you of changes to this section (and the Notice more generally) as described in the "Changes to Our Privacy Notice" section.

Cookies and Similar Technologies

In operating the Site, we may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. On most web browsers, you will find a "help" section on the toolbar. If you leave cookies turned on they will allow you to take advantage of more of the Site features. We may, and we may allow third party service providers to, use cookies

or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Site. For example, we use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this data, go to www.google.com/policies/privacy/partners/.

Do-Not-Track Signals

Certain web browsers and other programs may transmit "opt-out" signals, also called a Global Privacy Control (or GPC) signal (we refer to these as "GPC Signals"), to websites with which the browser communicates. In most cases you will need to change your web browser's settings or add an application to your web browser to enable your browser to send a GPC Signal. We may recognize GPC Signals for Site users differently, based on the location of the user when they access our Sites. For some users, we will recognize and apply the GPC Signal to inactivate all of the cookies for that website, except for cookies that are necessary for the website to operate ("Strictly Necessary Cookies"). For users from jurisdictions not currently requiring recognition of the GPC Signal, our Site servers may not recognize and apply the GPC Signal.

Opt-out of Sale, Sharing, Targeted Advertising, or Limit the Use of Sensitive Data

Certain of our practices may be considered the sale or sharing of Personal Data under applicable law. You may have the right to opt-out of the sale of Personal Data, opt-out of sharing of Personal Data for purposes of cross-context behavioral advertising, which in other states is the right to opt-out of targeted advertising, and the right to limit the use of sensitive Personal Data. To exercise these rights, please see the "Your Rights Regarding Your Personal Data" section below or turn off targeted advertising cookies in our cookie preference center.

For more information on our cookie practices, please see our Cookie Notice [here](#).

Children

We do not knowingly collect Personal Data from children under the age of 16. If you are under the age of 16, please do not submit any Personal Data through the Site. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Notice by instructing their children never to provide Personal Data on the Site without their permission. If you have reason to believe that a child under the age of 16 has provided Personal Data to us through the Site, please contact us, and we will endeavor to delete that information from our databases.

Third Parties

Combination of Data

We may combine information we collect, whether Personal Data or not, with Personal Data that we may obtain from third parties.

Third-Party Service Providers

Third-party service providers acting on our behalf must execute agreements including confidentiality requirements and will only process Personal Data as necessary to perform their functions in a manner consistent with this Notice, other applicable privacy notices, and as explicitly permitted or required by applicable laws, rules, and regulations. Our third-party service providers may be located in the United States and other jurisdictions.

Links to Other Web Sites

This Privacy Notice applies only to the Site. The Site may contain links to other web sites not operated or controlled by Disc Medicine (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Site do not imply that Disc Medicine endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

Your Rights Regarding Your Personal Data

Please note that in many circumstances, we cannot effectively do business with you without processing some Personal Data about you (e.g., your contact information). For example, when you contact customer service representatives, we may require you to provide information to authenticate your identity to assist you with your request. If you are unable to provide this information, we may be unable to process your request.

Under your jurisdiction's data protection law, you may be able to exercise the following rights with respect to some or all of your Personal Data:

- to request access to and a copy or representative summary your Personal Data (including under GDPR Article 15);
- to request that we rectify or erase your Personal Data (including under GDPR Articles 16 and 17);

- to request that we restrict or block the processing of your Personal Data (including under GDPR Articles 18, 21 and 22 and to object to the sale or sharing of your Personal Data under other relevant laws);
 - This includes the right to opt out of solicitations and to opt-out of sharing your Personal Data for cross-context behavioral or targeted advertising;
- to provide your Personal Data directly to another organization, i.e., a right to data portability (including under GDPR Article 20);
- when we previously obtained your consent, to withdraw consent to processing (including under GDPR Article 21);
- to request that we limit the processing of your Sensitive Personal Data;
- to appeal the denial of a request; and
- To lodge a complaint with the data protection authority in your area (including under GDPR Article 77).

To exercise these rights, or make a request with respect to your Personal Data, please write to us at privacy@discmedicine.com.

We will make reasonable efforts to respond promptly to your requests in accordance with applicable laws. We may, after receiving your request, require additional information from you to honor the request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

Transfer of Personal Data Across National Borders

If you provide us with your Personal Data, you acknowledge that such Personal Data may be transferred from your current location to the offices and servers of Disc Medicine and the authorized third parties referred to herein, which may be located in the United States.

Please be aware that Personal Data we collect and process may be transferred and maintained outside your state, province, country, or other jurisdiction, where the privacy laws may differ to those in your location, including the United States. Disc Medicine has put in place safeguards in accordance with applicable legal requirements, to protect your Personal Data irrespective of the standards in the country where your Personal Data may be transferred. This includes entering into agreements with third parties, such as service providers, to require them to adopt standards that ensure an equivalent level of protection for data as those we adopt.

How Long Your Personal Data Will Be Retained

We will retain your Personal Data as long as it is necessary to pursue the purposes for which the data is being collected as described above. We may retain Personal Data therefore as long as is reasonably necessary for legitimate business purposes or legal and regulatory purposes. Whenever possible, we aim to anonymize the information or remove unnecessary identifiers from records that we may need to keep for periods beyond the specified retention period.

Security

We take commercially reasonable steps to protect the Personal Data provided via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from the Site may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to us via the internet.

Changes to Our Privacy Notice

The Site and our business may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Notice. We reserve the right to update or modify this Privacy Notice at any time and from time to time without prior notice. Please review this Notice periodically, and especially before you provide any Personal Data. This Privacy Notice was last updated on the date indicated above. Your continued use of the Site after any changes or revisions to this Privacy Notice shall indicate your agreement with the terms of such revised Privacy Notice.

Contact

If you have questions or comments about this Notice or about how your Personal Data is processed, please contact privacy@discmedicine.com. We will make reasonable efforts to respond promptly to your requests in accordance with applicable laws. We may, after receiving your request, require additional information from you to honor the request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.