

# Cabaletta Bio, Inc. - HR Privacy Notice

## (United Kingdom, Switzerland and European Economic Area)

Effective Date: September 19, 2024

### 1. Introduction

Cabaletta Bio, Inc., and its affiliates and subsidiaries (“Cabaletta Bio”, “we,” “us,” or “our”) takes the protection of your personal information (“**Personal Data**”) very seriously. The purpose of this HR Privacy Notice (the “**Notice**”) is to explain how Cabaletta Bio processes the Personal Data it obtains about employees, directors, officers, members, contractors and agents of Cabaletta Bio, as well as their family members, dependents, and contacts.

We ask that all employees within the United Kingdom, Switzerland and the European Economic Area (i.e. countries in the European Union, Norway, Iceland and Liechtenstein) read this Privacy Notice to learn about what Personal Data we collect about you in relation to your working relationship with us, why and how we collect and use it, and with whom we might share it.

This Notice also informs you of your rights under data protection laws such as the United Kingdom (UK) and European Union (EU) General Data Protection Regulation (“**GDPR**”) and the Swiss Federal Act on Data Protection and explains how you can contact us if you would like to exercise your rights or if you have any questions or concerns.

Cabaletta Bio has adopted this Notice to comply with the GDPR and the Swiss Federal Act on Data Protection. Any terms defined in the GDPR and the Swiss Federal Act on Data Protection have the same meaning as when used in this Notice, as applicable. This Notice applies unless you receive a more specific privacy notice with respect to any of the Personal Data we process about you, such as an employee notice related to our use and disclosure of information in limited circumstances.

If you have any questions about this Notice, please seek additional information from Human Resources.

### 2. Scope

This Notice principally applies to employees of Cabaletta Bio located within the UK, Switzerland and the European Economic Area, even after the end of their employment. Where relevant, it also applies to job applicants, temporary staff, interns, volunteers, agency workers, contractors, directors, and third parties whose Personal Data is provided to us in connection with employment, directorship or a work relationship with Cabaletta Bio, including family members, dependents and contacts (e.g., for purposes of benefits administration or providing emergency contacts or employment references). Before you provide such third-party Personal Data to Cabaletta Bio you should first inform these third

parties of any such data which you intend to provide to Cabaletta Bio and of the processing to be carried out by Cabaletta Bio, as detailed in this Notice.

As used in this Notice the terms “employee” or “employment” are intended to include those who provide services to Cabaletta Bio on a basis other than employment, but this does not in any way indicate that the individual is an employee of Cabaletta Bio or has an employment relationship with Cabaletta Bio under applicable laws.

This Notice does not form part of any contract of employment and does not confer any contractual right on you, or place any contractual obligation on us. We may update or otherwise amend this Notice at any time.

This Notice is issued on behalf of Cabaletta Bio and our affiliates and subsidiaries (as defined in the section [Entities Covered by This Notice](#)). When reading this Notice, “**Cabaletta Bio**” refers to the relevant company in the Cabaletta Bio group that is responsible for processing your Personal Data (typically, your employer).

## **2.1. Cabaletta Bio’s Role as Data Controller**

Within the scope of this Notice, Cabaletta Bio acts as a data controller or “business” for the Personal Data we collect or that others collect on our behalf. This means that we are responsible for determining the purposes and means of the processing of your Personal Data – in other words, how and why we collect, use, and share it.

## **2.2. Entities Covered by This Notice**

This Notice covers Cabaletta Bio and the following affiliates and subsidiaries:

- Cabaletta Bio GmbH
- Cabaletta Bio (Germany) GmbH

## **2.3. Out of Scope of This Notice**

This Notice applies only to the Personal Data collected by Cabaletta Bio as described in [Categories of Personal Data Collected](#).

This Notice does not apply to Personal Data we collect in other contexts, such as Personal Data we collect about the business representatives of our vendors and business customers, or our website visitors. For more information about our collection of Personal Data in other contexts, please see <https://www.cabalettabio.com/privacy-policy>.

Personal Data does not include de-identified or aggregated information.

# **3. Categories of Personal Data Collected**

Personal Data is needed for several reasons, such as being able to pay employees, contact employees, administer benefits, etc.

Cabaletta Bio receives Personal Data primarily through:

- **Information you provide to us directly.** This could include documents that are required for employment, such as a job application, background check authorization form, passport direct deposit information, tax forms and other legal requirements.
- **Third parties.** This could include data that is provided to Cabaletta Bio from third parties such as a recruiting or hiring agency, former employer or reference, authorities, or some other information provider.

The table below includes the categories of Personal Data that we may have collected about you in the last twelve months or may collect in the future based on your working relationship with Cabaletta Bio:

**Table 1: Categories of Personal Data Collected**

| Category                       | Personal Data We Collect                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identifiers                    | <p><b>Employees:</b></p> <p><u>Biographical information</u>, including but not limited to first name, middle name, last name, former last name, preferred first name, date of birth.</p> <p><u>Contact information</u>, including but not limited to email, address (address line 1, 2, city, state/province abbreviation, ZIP/Postal code, county, country code), personal and corporate phone number.</p> <p><u>Financial information</u>, including but not limited to bank account number.</p> <p><u>Application information</u>, including but not limited to the information included in an application form, CV and references.</p> <p><u>Mobile and computer usage</u>, including but not limited to VPN used, IP address.</p> <p><b>Emergency contacts:</b></p> <p><u>Biographical information</u>: first name, last name.</p> <p><u>Contact information</u>: phone number, relationship with the relevant employee.</p> <p><b>Family Members and Dependents:</b></p> <p><u>Biographical information</u>: first name, last name, date of birth.</p> |
| Sensitive personal information | <p><b>Employees:</b></p> <p><u>Information needed for equal opportunities monitoring policy</u>, including but not limited to age, race, marital status, medical conditions, physical or mental disability, sex (including gender, gender identity, gender expression), sexual orientation, pregnancy or veteran or military status.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                                                          | <p><u>Other</u>, including but not limited to insurance policy number, education, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, COVID 19 vaccination status, or health insurance information.</p> <p><i>*Some personal information included in this category may overlap with other categories.</i></p>                                                                                                                                                                                                                                                                                                  |
| Commercial/<br>financial<br>information                  | <u>Expense reimbursement information</u> , including items purchased with a Cabaletta Bio credit card.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Internet or<br>similar<br>network<br>activity            | <u>Mobile and computer usage information</u> , including but not limited to hours of work clocked on and off system, websites visited, VPN used, IP address, phone logs, and information that you may generate, send, receive, be copied on, have available to you or access using Cabaletta Bio systems or a mobile device.                                                                                                                                                                                                                                                                                                                                                                        |
| Monitoring<br>data                                       | <u>Security surveillance information</u> , including, where permitted under local law, identifiable images contained in CCTV footage, system and building login and access records, and data caught by IT security programs and filters.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Geolocation<br>data                                      | <u>Information inferred from your IP address</u> , including but not limited to the city where Cabaletta Bio systems are accessed from.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Sensory data                                             | <u>Other</u> , photographs, images and videos taken for work-related purposes or in work setting, recorded calls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Professional or<br>employment-<br>related<br>information | <u>Employment information and information related to your work with Cabaletta Bio</u> , including but not limited to position, company name, hire date, start date, salaried or hourly, pay rate and related information (including pay scale, information regarding raises, bonus compensation and salary adjustments), full time or part time, hours per week, schedule information, contract of employment and amendments to it, personal or sick leave information, benefits information, career history, training records and results, professional qualifications (e.g., licenses or certifications), appraisals and performance management measures, and disciplinary and grievance records. |
| Job application<br>information                           | <u>Information included in your application</u> , including but not limited to transcripts, diplomas, professional references.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Health and<br>Safety Data                                | <u>Health-related information</u> including, but not limited to, reasons for absence, medical reports and notes, and COVID 19 vaccination status.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| Claims and Complaints        | <u>Information concerning employment-based litigation and complaints and employee involvement in incident reporting and disclosures</u>                                              |
| Other types of Personal Data | Any other Personal Data which you choose to disclose to Cabaletta personnel during the course of your employment, whether verbally or in written form (for example, in work emails). |

We will not collect additional categories of Personal Data without informing you.

### **3.1. Personal Data about Children Under the Age of 16**

We do not knowingly collect Personal Data from children under the age of 16, unless a child under the age of 16 is the only emergency contact that an employee provides or if this information is collected pursuant to an employee providing details of their minor dependents for health insurance or other related employment benefits. In these circumstances, we collect and process the Personal Data of such children in accordance with parental consent.

If you believe we might have any information from or about a child under the age of 16 for any other reasons other than those stated above, please contact us by using the contact details provided [here](#). If we learn that we have collected or received Personal Data from a child under the age of 16 without parental consent, we will delete that Personal Data.

## **4.Sources of Personal Data Collected**

As part of our human resources processes, we need to collect and process Personal Data relating to our employees.

Primarily, the Personal Data Cabaletta Bio processes about you will have been provided by you, either during your application for employment or engagement, the on-boarding process, or on an ad-hoc basis during the course of your employment or engagement. This will especially include your personal and basic work details as well as equality and diversity data, if and to the extent permitted by applicable laws.

During the recruitment process, we may request references from third parties, and carry out screening and vetting processes using third party sources. We carry out such screening and vetting processes only to the extent permitted by applicable laws. These may include reference checks, credit checks, and sanctions checks.

We also receive information which may include your Personal Data from your manager (for example, in respect of performance reviews) or, from time to time, from other managers or colleagues (for instance, in the course of conducting an investigation).

We may also receive Personal Data about you from other third parties, for example your family members or next of kin, clients, prospects, tax authorities, law enforcement authorities, benefit providers, brokers and regulatory bodies to the extent permitted by applicable laws.

In some circumstances, Personal Data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, telephone logs and recordings and email and Internet access logs), if and to the extent permitted by applicable laws. In these circumstances, the Personal Data may be collected by Cabaletta Bio or a third party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible. Access may occur, for instance, in situations where Cabaletta Bio is investigating possible violations of Company policies such as those relating to travel and expense reimbursement, use of the Internet, or employees conduct generally, or where the data are needed for compliance purposes. More frequent access to such data may occur incidental to an email surveillance program, if and to the extent permitted by applicable laws. Cabaletta Bio will not use any such collected data for any purpose other than as explicitly stated in this Notice.

Where we ask you to provide Personal Data to us on a mandatory basis, we will inform you of this at the time of collection. Failure to provide any mandatory information may mean that we cannot carry out certain HR processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases, it may mean that we are unable to continue with your employment or engagement as Cabaletta Bio will not have the Personal Data we believe to be necessary for the effective and efficient administration and management of our relationship with you.

Apart from Personal Data relating to yourself, you may also provide Cabaletta Bio with Personal Data of other third parties, notably your references, dependents, next of kin, and other family members, for purposes of HR administration and management, including employment verification, the administration of benefits and to contact your next of kin in an emergency.

## 5. Lawful Basis for Processing

The GDPR and other applicable data protection laws require that we have a valid reason to use your Personal Data. This is called the "lawful basis for processing." We may process your Personal Data for the following reasons:

- Because you gave your consent.
- Because we need to process your Personal Data in order to perform a contract with you.
- Because we have a legitimate interest in processing your Personal Data and it is not overridden by your rights. Some of those interests include:
  - Identifying and preventing fraud.
  - Enhancing the security of our network and information systems.
- Because we need to process your Personal Data in order to comply with the law.
- On another ground, as required or permitted by law.

When we rely on legitimate interests as a lawful basis of processing, you have the right to ask us more about how we decided to choose this legal basis, and you have the right to object to processing on this basis. To do so, please use the contact details provided [here](#).

Where we process your or your child's Personal Data based on your consent, you [may withdraw it at any time](#). However, this will not affect the lawfulness of our processing before you withdrew your consent. It will also not affect the validity of our processing of Personal Data performed on other lawful grounds.

Where we receive your Personal Data in the context of a contractual relationship, we will process that Personal Data only to the extent that we must do so in order to carry out the contract. It will be "necessary" for us to process your Personal Data for the purposes of executing a contract if we would not be able to fulfill our contractual obligations without engaging in such processing. For example, we might not be able to pay you without processing your bank account number(s).

In a similar fashion, we often need to process certain Personal Data in order to meet our legal obligations, such as reporting employee taxes or ensuring the health and safety of our employees.

## 5.1. How Cabaletta Bio Uses Your Personal Data

Cabaletta Bio does not sell your Personal Data.

Cabaletta Bio may collect, use, or disclose your Personal Data for one or more of the purposes set forth in the below Table 2.

**Table 2: Purposes for Collecting Employee Personal Data**

| Category    | Purposes for which we collect and use your Personal Data                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identifiers | <ul style="list-style-type: none"><li>• Recruiting purposes, such as conducting the recruiting process, arranging interviews or testing, and making hiring decisions.</li><li>• Setting you up as a Cabaletta Bio employee, for example, to create an email address, and related onboarding activities.</li><li>• Arranging training and development activities.</li><li>• Managing company expenses.</li><li>• Providing contractually agreed-upon compensation, bonuses, or benefits.</li><li>• Processing your time-off requests.</li><li>• Monitoring your use of our information and communication systems and other assets to protect and maintain the integrity of Cabaletta Bio IT systems and infrastructure, to ensure compliance with Cabaletta Bio IT policies and to locate information through searches where needed for a legitimate business purpose.</li></ul> |

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|                                      | <ul style="list-style-type: none"> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> <li>• Entering, performing, and terminating employment and service contracts, determining the terms for which you work for Cabaletta Bio, managing employment contracts or your working relationship with Cabaletta Bio, amending agreements, appendices and other contracts related to your employment or services for Cabaletta Bio.</li> <li>• Responding to your requests or questions.</li> <li>• Conducting background checks.</li> </ul>                                                         |
| Sensitive personal information       | <ul style="list-style-type: none"> <li>• Considering how health affects your ability to work and making any necessary adjustments.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> <li>• Responding to your requests or questions.</li> <li>• Conducting background checks.</li> <li>• Ensuring a safe and healthy workplace.</li> <li>• Investigating and reporting on incidents.</li> <li>• Administering benefits.</li> <li>• Monitoring of equal opportunity practices and standards.</li> <li>• Complying with any necessary legal obligations or laws.</li> </ul>               |
| Commercial/financial information     | <ul style="list-style-type: none"> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> <li>• Entering, performing, and terminating employment and service contracts, determining the terms for which you work for Cabaletta Bio, managing employment contracts or your working relationship with Cabaletta Bio, amending agreements, appendices and other contracts related to your employment or services for Cabaletta Bio.</li> <li>• Preventing fraud or other criminal activity.</li> <li>• Responding to your requests or questions.</li> <li>• Conducting background checks.</li> </ul> |
| Biometric information                | <ul style="list-style-type: none"> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> <li>• Conducting background checks.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Internet or similar network activity | <ul style="list-style-type: none"> <li>• Monitoring your use of our information and communication systems and other assets to protect and maintain the integrity of Cabaletta Bio IT systems and infrastructure, to ensure compliance with Cabaletta Bio IT policies and to</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|                  | <p>locate information through searches where needed for a legitimate business purpose.</p> <ul style="list-style-type: none"> <li>• Providing technical support, including support and maintenance for IT systems.</li> <li>• Preventing fraud or other criminal activity.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> <li>• Responding to your requests or questions.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Monitoring data  | <ul style="list-style-type: none"> <li>• Protecting the private, confidential and proprietary information of Cabaletta, its employees, business partners and third parties.</li> <li>• Protecting the security of our sites, systems, employees and visitors.</li> <li>• Monitoring your use of our information and communication systems and other assets to protect and maintain the integrity of Cabaletta Bio IT systems and infrastructure, to ensure compliance with Cabaletta Bio IT policies and to locate information through searches where needed for a legitimate business purpose.</li> <li>• Preventing fraud or other criminal activity.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> </ul>                                                                                                                                                                                              |
| Geolocation data | <ul style="list-style-type: none"> <li>• Entering, performing, and terminating employment and service contracts, determining the terms for which you work for Cabaletta Bio, managing employment contracts or your working relationship with Cabaletta Bio, amending agreements, appendices and other contracts related to your employment or services for Cabaletta Bio.</li> <li>• Recruiting purposes, such as conducting the recruiting process, arranging interviews or testing, and making hiring decisions.</li> <li>• Monitoring your use of our information and communication systems and other assets to protect and maintain the integrity of Cabaletta Bio IT systems and infrastructure, to ensure compliance with Cabaletta Bio IT policies and to locate information through searches where needed for a legitimate business purpose.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> </ul> |

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| Sensory data                                   | <ul style="list-style-type: none"> <li>• Monitoring your use of our information and communication systems and other assets to protect and maintain the integrity of Cabaletta Bio IT systems and infrastructure, to ensure compliance with Cabaletta Bio IT policies and to locate information through searches where needed for a legitimate business purpose.</li> <li>• Publishing photographs / recordings in Cabaletta Bio's external communications material.</li> <li>• Publishing photographs / recordings in social media posts and digital material on Cabaletta Bio's social media accounts.</li> <li>• Publishing photographs / recordings in Cabaletta Bio's internal communications material, including emails and intranet posts.</li> <li>• Taking photographs for security purposes.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> </ul> |
| Professional or employment-related information | <ul style="list-style-type: none"> <li>• Entering, performing, and terminating employment and service contracts, determining the terms for which you work for Cabaletta Bio, managing employment contracts or your working relationship with Cabaletta Bio, amending agreements, appendices and other contracts related to your employment or services for Cabaletta Bio.</li> <li>• Recruiting purposes, such as conducting the recruiting process, arranging interviews or testing, and making hiring decisions.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings, or dealing with legal disputes involving you, or other employees, including accidents at work.</li> <li>• Providing feedback based information collected through surveys.</li> </ul>                                                                                                                                                                                                         |
| Job application information                    | <ul style="list-style-type: none"> <li>• Entering, performing, and terminating employment and service contracts, determining the terms for which you work for Cabaletta Bio, managing employment contracts or your working relationship with Cabaletta Bio, amending agreements, appendices and other contracts related to your employment or services for Cabaletta Bio.</li> <li>• Recruiting purposes, such as conducting the recruiting process, arranging interviews.</li> <li>• Monitoring of equal opportunity practices and standards.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings.</li> </ul>                                                                                                                                                                                                                                                                                                                                                       |
| Health and safety data                         | <ul style="list-style-type: none"> <li>• Ensuring a safe and healthy workplace.</li> <li>• Investigating and reporting on incidents.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|                       | <ul style="list-style-type: none"> <li>• Administering benefits.</li> <li>• Considering how health affects your ability to work and making any necessary adjustments.</li> <li>• Assessing eligibility for incapacity or permanent disability related remuneration or benefits.</li> </ul>                                    |
| Claims and complaints | <ul style="list-style-type: none"> <li>• Enforcing Cabaletta Bio's legal rights and obligations, and for any purposes in connection with any legal claims, reports of violations or allegations made by, against or otherwise involving you.</li> <li>• Defending Cabaletta Bio in the event of legal proceedings.</li> </ul> |

## 5.2. Automated Decision-Making

Employees will not be subject to decisions that will have a significant impact on them based solely on automated decision-making. There will always be human intervention into decisions based on automated processing, including automated analytics, testing, and profiling. If this position changes, or there is a need and lawful basis to do so, we will notify any affected employees.

## 6. Sharing of Personal Data Collected

### 6.1. Overview of Data Sharing Practices

Cabaletta Bio may share Personal Data with third parties, such as suppliers, service providers, customers, and other business partners that process Personal Data on our behalf. Your Personal Data is shared with these third parties to fulfil a contractual obligation.

These third parties agree to only use the Personal Data to assist in providing our products, services, and internal operations, or as otherwise required by law. They may provide the services listed in Section [6.26.2](#) below.

Cabaletta Bio may also disclose Personal Data when required by law or in good-faith belief that a disclosure is necessary to comply with official investigations or legal proceedings (whether initiated by government or law enforcement officials or private parties). If required to disclose employee Personal Data to government or law enforcement officials, Cabaletta Bio may not be able to ensure that those officials will maintain the privacy and security of employee Personal Data.

Cabaletta Bio reserves the right to use, transfer, sell, and share aggregated, anonymous data for any legal business purpose. As this Personal Data is anonymized, such data is not considered Personal Data under applicable privacy laws.

We do not sell your Personal Data to third parties.

## **6.2. Types of Third Parties that Process Your Personal Data**

The categories of third parties to whom we have disclosed or may disclose your Personal Data for business purposes include those listed below.

- Payroll services
- Performance management services
- Human resources information system software and services
- Visa services
- Mobility services
- Catering services
- Background screening solutions
- Benefit management services
- Online work collaboration tools
- Learning management system services
- Legal services
- Audit or internal research services
- Information Technology services
- Cybersecurity services
- Quality control services
- Application hosting services
- Cloud storage services
- Email software
- CRM software
- Business/data analytics services
- Social media management solutions
- Electronic Data Interchange services
- Digital Asset Management
- Online survey development cloud-based software
- Enterprise Resource Planning (ERP) service
- Benefit management services
- Website analytics services
- Outsourced adverse events call services
- Marketing services
- Data aggregators
- Behavioral advertising networks
- Internet service providers
- Operating systems and platforms
- Private research organizations
- Social networking websites and platforms
- Third parties to whom you or your agents ask us to disclose your Personal Data

### **6.3. International Transfers of Personal Data**

Some of the entities we send Personal Data to are located outside of Switzerland, the European Economic Area and the UK. In some cases, the relevant authorities may have determined that the data protection laws of some countries provide a level of protection equivalent to Swiss, EU or UK law. For example, you can see [here](#) the list of countries that the European Commission has recognized as providing an adequate level of protection to Personal Data.

When the Swiss Federal Data Protection Act or the GDPR applies to the processing of Personal Data, Cabaletta Bio will only transfer the data out of those regions to countries that have not been recognized as providing an adequate level of protection to Personal Data by using appropriate transfer mechanisms such as the [European Commission approved standard contractual data protection clauses](#) under [Article 46.2](#) of the GDPR. We typically transfer Personal Data to the USA.

### **6.4. Retention of Your Personal Data**

We retain your Personal Data for as long as necessary to fulfil the purposes it is collected for, unless a longer retention period is required or permitted by law, including for the purposes of satisfying any legal, accounting, or reporting requirements, or any other lawful purposes. In the case of most employee Personal Data, it is retained for a minimum of seven (7) years whilst employed at Cabaletta Bio.

If you are no longer employed by Cabaletta Bio, your Personal Data will be retained or securely destroyed in accordance with our data retention policy and applicable laws and regulations.

## **7. Your Privacy Rights**

You have specific rights regarding your Personal Data. This section describes your rights, and how you can exercise those rights.

### **7.1. Your Right to Know What Personal Data We Have About You**

You have the “right of access”, meaning you can request that we disclose certain information to you about our collection and use of your Personal Data over the past twelve (12) months.

Once we confirm it was [you](#) or [your authorized agent](#) who made the request, we will disclose to you:

- The categories of Personal Data we have collected about you.
- The categories of sources for the Personal Data we collect about you.
- Our business or commercial purpose for collecting your Personal Data.
- The categories of service providers or third parties with whom we share that Personal Data.

- The specific pieces of Personal Data we have about you (this is also called a data portability request).
- If we disclosed your Personal Data for a business purpose, we will list the disclosures and identify the categories of the Personal Data disclosed to each category of recipient.

## **7.2. Your Right to Know What Happens to Your Personal Data**

You have the “right to be informed,” which means you have the right to know how Cabaletta Bio collects, uses, and shares your Personal Data. This Notice provides you with this information.

## **7.3. Your Right to Change Your Personal Data**

You have the “right to rectification.” If you think that your Personal Data maintained by Cabaletta Bio is incorrect or incomplete, you have the right to request that it be corrected or completed.

## **7.4. Your Right to Change How We Process Your Personal Data**

You have the “right to restrict processing,” which means you have the right to request that Cabaletta Bio only uses or stores your Personal Data for certain purposes.

## **7.5. Your Right to Ask Us to Stop Using Your Personal Data**

You have the “right to object,” which means that you can request that Cabaletta Bio stop using your Personal Data.

## **7.6. Your Right to Port or Move Your Personal Data**

You have the “right to data portability,” which means you can ask for and receive a portable copy of your Personal Data provided to Cabaletta Bio so that you can move it, copy it, keep it for yourself, or transfer it to another organization.

## **7.7. Your Right to Withdraw Your Consent**

As discussed in [Lawful Basis for Processing](#), certain privacy laws require that we clarify the basis we use for processing Personal Data. If the basis for processing was employee consent, you have the right to withdraw this consent. If you withdraw your consent, Cabaletta Bio’s use of your Personal Data before this withdrawal is still lawful.

## **7.8. Your Right to Have Your Personal Data Deleted**

You have the right to request that we delete any of your Personal Data. Once we receive and confirm that it was you or your authorized agent who made the request, we will delete (and direct our service providers to delete) your Personal Data from our records, unless an exception applies. If such a request is denied, Cabaletta Bio will consider how the use of your Personal Data can be limited instead of deleted.

We may deny a request to delete your Personal Data if we or our service providers need to retain the information to do any of the following:

- Complete the transaction for which we collected the Personal Data, take actions reasonably anticipated within the context of our ongoing business or employment relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise the rights of freedom of expression and speech, ensure the right of another individual to exercise their freedom of speech or expression rights, or exercise another right provided for by law.
- For the establishment, exercise, or defense of legal claims.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **7.9. Your Right to Lodge a Complaint with a Supervisory Authority**

If the Swiss Federal Data Protection Act or the GDPR applies to our processing of your Personal Data, you have the right to lodge a complaint with a supervisory authority if you are not satisfied with how we process your Personal Data.

Specifically, you can lodge a complaint in the country of your habitual residence, place of work, or the place where there alleged violation of the relevant data protection law took place.

### **7.10. Exercising Your Privacy Rights**

To exercise any of the rights described in this Notice, please submit a request by email to:

[privacy@cabalettabio.com](mailto:privacy@cabalettabio.com)

You can also contact our Data Protection Officer:

**VeraSafe**

**100 M Street S.E., Suite 600**

**Washington, D.C. 20003**

## USA

Tel: +1 (617) 398-7067

Email: [experts@verasafe.com](mailto:experts@verasafe.com)

If you are submitting a request on behalf of somebody else, we will need to verify your authority to act on behalf of that individual. When contacting us, please provide us with proof that the individual gave you signed permission to submit this request, and a valid power of attorney on behalf of the individual.

Alternatively, you may ask the individual to directly contact us by using the contact details above to verify their identity with Cabaletta Bio and confirm with us that they gave you permission to submit this request.

We will only use the Personal Data you provide us in a request to verify your authority.

Please allow us up to one calendar month to reply to your requests to exercise your privacy rights. If we need more time, we will tell you why and provide the extension period in writing.

If we cannot satisfy a request, we will also explain why in our response.

We commit to not charging a fee for processing or responding to your requests. The only situations where we may charge a fee is when we determine that your request is excessive, repetitive, or manifestly unfounded. In those cases, we will tell you why we made that determination and provide you with a cost estimate before completing your request.

## 8. How We Protect Your Personal Data

We are committed to keeping your Personal Data safe. We have implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect your Personal Data from unauthorized processing. Unauthorized processing includes unauthorized access, exfiltration, theft, disclosure, alteration, or destruction. Some of those measures include encryption and redaction, and we also have dedicated teams to look after information security and privacy.

## 9. Contact Us

If you have any questions or comments about this Notice, how we collect and use your Personal Data, your choices and rights regarding such use, or if you wish to exercise your privacy rights, please contact us by email to:

[privacy@cabalettabio.com](mailto:privacy@cabalettabio.com)

You can also contact our Data Protection Officer as follows:

**VeraSafe**

100 M Street S.E., Suite 600

Washington, D.C. 20003

USA

Tel: +1 (617) 398-7067

Email: [experts@verasafe.com](mailto:experts@verasafe.com)

## 10. Changes to This Notice

Cabaletta Bio may change or update this Privacy Notice at any time.

If we make any material change to this Notice, we will post the revised Notice to Cabaletta Bio's corporate website. We will also update the "Effective" date set out in the heading of this Notice.

### **Additional Privacy Notices**

We may undertake certain processing of Personal Data which are subject to additional privacy notices and we shall bring these to your attention where they engage.