



Public Notice Regarding Processing of Clinical Trial Participant Data by LEO Pharma A/S

Effective date: 22 January 2026

LEO Pharma A/S ("LEO") is processing pseudonymised personal data relating to participants in Spesolimab clinical trials previously sponsored by Boehringer Ingelheim International GmbH ("BI"), in connection with an exclusive global licence and transfer agreement concerning Spevigo®. For further information on the relevant clinical trials, please see LEO Pharma's listing on [ClinicalTrials.gov](https://clinicaltrials.gov).

The data transferred to and processed by LEO may include the following and other categories of personal data as described in the informed consent provided at the time of participation:

- personal data collected during BI-sponsored clinical trials;
- coded/pseudonymised clinical information;
- study-related medical history; and
- other clinical trial data relevant to the continued development, safety monitoring, and regulatory compliance relating to Spevigo®, including biobanked biological samples and associated data.

LEO processes these data for the following purposes:

- to comply with legal and regulatory obligations, including Good Clinical Practice;
- to conduct pharmacovigilance and safety monitoring;
- to support scientific research; and,
- to support product development.

Processing is carried out in accordance with applicable data protection laws, including, where relevant, Articles 6(1)(c), 6(1)(f), 9(2)(i), and 9(2)(j) of the EU General Data Protection Regulation.

LEO Pharma A/S acts as the global sponsor and data controller for the processing of these personal data from the above-mentioned date of transfer.

Your rights

As part of our processing of your personal data, your rights to request access to, correction, or transfer of your personal information are limited, as your personal data must be managed in certain ways for the research to be reliable and accurate and to comply with applicable rules and regulations. Samples that have already been analyzed and data that have already been generated by analyzing your samples will not be deleted or destroyed and will be kept in accordance with applicable laws and regulations.

To protect your rights, a minimum of personally identifiable information will be used to process your personal data.

Transfer of your personal data

Your pseudonymized personal data has been transferred to LEO Pharma. These data do not include your name or other information that can identify you directly. Pseudonymized data may also be transferred to an affiliate of LEO Pharma, a third party contracted by LEO Pharma, a business partner of LEO Pharma, or a collaboration partner of LEO Pharma. The transfer may take place as part a trial, as part of research and development activities, or as part of normal business procedures.

Your pseudonymized personal data may be transferred to and processed in other countries than your country of residence, where the protection of personal data may not be as strict. If your personal data are transferred outside of your country of residence, LEO Pharma will make sure that your samples and personal data are protected by making legally binding contracts with the third parties receiving the personal data. The contracts are based on standard contractual clauses issued by the EU Commission. You may ask to whom your personal data and samples have been transferred to at any time.

How long will your personal data be stored?

LEO Pharma will keep your pseudonymized personal data for as long as they are useful for developing treatments for your disease and other related diseases, and for at least 25 years after the end of the clinical trial or as long as required by applicable laws and regulations. If LEO Pharma decides to stop developing treatments for your disease, your personal data will be evaluated, and it will be decided if they are still useful for developing treatments for other related diseases. LEO Pharma will erase your personal data if they are no longer useful.

If you have any questions about your personal data, the data collection at the trial site, or your medical record, you should contact the trial doctor.

You are also always welcome to contact the LEO Pharma's Data Protection Officer if you have any questions about the processing of your personal data:

Sponsor:

LEO Pharma A/S

Industriparken 55

2750 Ballerup

Denmark

Email: dataprivacy@leo-pharma.com

Data Protection Officer:

Email: DPO@leo-pharma.com

Please note that LEO Pharma does not know your name, only your trial participant number. If you contact LEO Pharma, the trial doctor will need to confirm your identity before we can answer your questions.

Furthermore, you have the right to and can always lodge a complaint with a local data protection authority.

The relevant trials have closed or participants have completed their participation in ongoing trials, and direct notification of individual participants is not feasible. Accordingly, this public notice is provided in order to ensure transparency regarding the processing of personal data, including in circumstances where individual notice would involve a disproportionate effort within the meaning of Article 14(5)(b) GDPR.