Privacy Notice for Clinical Trial Participants in the Canada

This privacy notice is for data subjects participating in clinical trials in the Canada ("**Clinical Trial Participants**").

Eupraxia Pharmaceuticals Inc. ("**Eupraxia**") is committed to protecting the privacy and security of Personal Data it processes for the purpose of conducting clinical trials. This Privacy Notice explains how we do this.

Eupraxia is subject to Canada's federal privacy legislation – the Personal Information Protection and Electronic Documents Act ("**PIPEDA**") – which applies when personal information is transferred between provinces and across international borders. When we collect and use Personal Information or monitor behavior or responses of data subjects in provinces with privacy legislation, we are subject to provincial legislation as well.

Eupraxia complies with clinical trial regulations and with any applicable laws in the country where the clinical trial is performed.

Eupraxia and Clinical Trial Data

Eupraxia does not directly collect and use Personal Data from Clinical Trial Participants taking part in our clinical trials. However, we are responsible for its collection and use by the Contract Research Organizations ("**CROs**") and service providers ("**third parties**") that conduct the trial on our behalf. Eupraxia only ever receives Pseudonymized Data from those third parties. This means Eupraxia cannot identify you personally.

During the clinical trial consent process, doctors enrolling Clinical Trial Participants into the study provide information about the trial, explain how Personal Information will be managed and protected and share a link to this Privacy Notice.

Data Subjects in Canada

If you are a Clinical Trial Participant in Canada and would like more information about the specific trial in which you enrolled or have questions about the processing of your Personal Information, please contact the doctor that enrolled you in the trial.

Privacy Officer

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

Privacy Officer

Eupraxia Pharmaceuticals Inc.

201-2067 Cadboro Bay Road, Victoria, British Columbia, Canada V8R 5G4

Phone: 1-250-590-7290

privacy@eupraxiapharma.com

Scope

This Privacy Notice applies to Personal Information of Clinical Trial Participants in Eupraxia clinical trials. Personal Information can be in any format, including electronic and paper, and processed by categories of third-party organizations as described below.

Definitions

"**Clinical Trial Participant**" means an individual participating in a clinical trial and providing Personal Information to third parties Eupraxia has contracted with to conduct the trial.

"**Personal Information**" means any information relating to an identified or identifiable individual; an identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

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

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

"**Processing**" means any operations or set of operations performed on Personal Information. It includes the collection, use and disclosure of Personal Information as

defined in Canada's Personal Information Protection and Electronic Documents Act ("**PIPEDA**").

Personal Information Processed

- Clinical Trial Subject identifier (a unique ID number attributable to you)
- Location data – country, investigator site
- Personal details – year of birth, age in years, sex
- Health data
    - Physical details – height, weight, Body Mass Index (BMI)
    - Childbearing status
    - Physical and mental health data, including medical and surgical histories, medication usage, physical examinations, health assessments (e.g., blood pressure, heart function, x-rays, magnetic resonance images (MRIs)), laboratory testing results from blood, urine and other tissues, and opinions of your disease state or general health
    - Psychological details – e.g., quality of life questionnaires
- Data revealing racial or ethnic origin

Purpose for Processing Personal Information

Eupraxia processes Personal Information collected from Clinical Trial Participants for the purpose of scientific research into the effects of medical treatment and for safety and reliability purposes.

Legal Basis for Processing Personal Information

<u>Clinical Trial Data for Research Purposes:</u>

Processing related to research activities in the context of the clinical trial are carried out with your consent.

<u>Clinical Trial Data for Reliability and Safety Purposes:</u>

Processing expressly provided by legislation and relevant national provisions and which are related to the protection of health while setting standards of quality and safety for medicinal products by generating reliable and robust data will be based on Eupraxia's legal obligation. This includes processing adverse events records.

Automated Processing

During the course of the Clinical Trial, Eupraxia will not make decisions about Clinical Trial Participants based solely on automated processing.

Third Parties

Eupraxia works with third-parties to run our clinical trials. These include:

- Contract Research Organizations
- Statistical Research Analysts
- Clinical Advisors
- Safety monitoring board or safety review committee
- Technical providers of hosting and software services

Eupraxia's third-parties are required by law and contractual agreements to:

- Keep your Personal Information confidential and secure; and
- Only use your Personal Information in accordance with Eupraxia's instructions.

Clinical Trial Data Transmitted to Third Countries

Eupraxia is located in Canada. For the purposes of the Clinical Trial only, Clinical Trial Data from Clinical Trial Participants will be processed in the EU, Canada, and the US.

Eupraxia requires that our data processors provide appropriate safeguards to protect your Personal Information and maintain your rights under applicable legislation. We will ensure that there are adequate measures and specific guarantees in place to protect Personal Information.

Retention

Eupraxia 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.

- In Canada the retention period for clinical trial data is 25 years under Canadian Food and Drug Regulations.

Your Rights

Your rights related to the clinical trial are described in the Informed Consent Form that you received when enrolling in the clinical trial.

Eupraxia may not be able to comply with a direct request related to exercising rights or the processing of Personal Information when Eupraxia is not able to identify you. This would occur where Eupraxia has received Pseudonymized Data or where Personal Information has been destroyed or erased in accordance with our record retention obligations and practices.

Please contact the doctor 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. The doctor's contact details are on the clinical trial Informed Consent Form.

Security Measures

Eupraxia has 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.

Measures include controlling physical access to the data, as well as the relevant access, input, disclosure, security of availability, its separation from other data, and incident response measures.

We also consider 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 Eupraxia about privacy issues by email, please do not include any Personal Information (other than your contact information) in either the subject line or the content of your message.

You may contact our Privacy Officer with questions or complaints regarding this Privacy Notice and Eupraxia's processing of Personal Information:

Eupraxia Pharmaceuticals Inc.

201-2067 Cadboro Bay Road, Victoria, British Columbia, Canada V8R 5G4

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If the Privacy Officer is unable to resolve your concern, you may contact the Office of the Information & Privacy Commissioner of British Columbia.