

# PRIVACY POLICY

Last updated August 1 , 2025

This Privacy Policy applies to Belite Bio, Inc and its affiliates ( "BELITE", "we", "us" and "our"), which are the controllers of your personal information

We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us using the [contact details](#) provided below.

In this Privacy Policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please do not provide us with your personal information.

The Notice is valid for all pages hosted on the Website. It is not valid for the pages hosted by third parties to which BELITE may refer and whose privacy notices may differ. BELITE cannot therefore be held responsible for any data processed on these websites or by them.

This Notice also applies to any other website that BELITE may operate, including our Company pages on LinkedIn, Facebook, X (Twitter) or Instagram.

Please, note that for the use of social media, BELITE will be Joint-Controller with these social medias only for the following activities: accessing and processing statistical aggregate data these platforms provide. For any other processing on the platform, social media platform shall be considered as the sole Data Controller.

Facebook, including Instagram, and LinkedIn have created an "addendum" to their user agreements for company pages for the processing for which they are Joint-Controllers with us. Such agreement is not currently provided by Twitter.

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

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## **1. WHAT INFORMATION DO WE COLLECT?**

### **Personal information you disclose to us**

We collect personal information that you voluntarily submit to us when expressing an interest in obtaining information about us or our products, or otherwise contacting us.

If you complete our Contact IR Form, we will collect your name, email address and any additional information you choose to provide in the form. This information is used to contact you and provide you with the requested information or respond to your inquiry.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **Information We Collect Automatically**

We may automatically collect the following information about your use of our website through cookies and other technologies: your domain name; your browser type and operating system; web pages you view; links you click; your IP address; the length of time you visit our website; and the referring URL, or the webpage that led you to our website. We may combine this information with other information that we have collected about you, including, where applicable, your user name, name, and other personal information. Please see the section [“Cookies and Other Tracking Mechanisms”](#) below for more information.

## **2. COOKIES AND OTHER TRACKING MECHANISMS**

We and our third party service providers use cookies and other tracking mechanisms to track information about

your use of our website. We may combine this information with other personal information we collect from you (and our third party service providers may do so on our behalf).

European laws, including the General Data Protection Regulation (“GDPR”) and the e-Privacy Directive 2002/58/EC, create obligations for digital publishers such as BELITE to give visitors of their sites and apps information about how they will use and share their personal data, as well as about the use of cookies, mobile ad IDs, and other forms of local storage.

## **Cookies.**

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Some cookies allow us to make it easier for you to navigate our website, while others are used to enable a faster log-in process or to allow us to track your activities at our website. There are two types of cookies: session and persistent cookies.

- ◆ **Session Cookies:** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the website. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our website.
- ◆ **Persistent Cookies:** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity.

Cookies can also be classified depending on the purpose of their placement. Main categories are:

- Strictly necessary cookies (also called “technical cookies”): they allow you to browse a website, a platform or an app, and to use the various options or services on it (e.g., control traffic, identify data or session, access to restricted access sections or content, etc.).
- Functional cookies: they help BELITE to make the website usable by providing you some basic features and by remembering your preferences and choices of using BELITE’s website (e.g., language, the region from where the service is accessed, etc.). Not accepting cookies may cause slow website performance or poorly adapted recommendations.
- Statistics cookies: they allow BELITE to have a better understanding of how you interact with the website (e.g., which pages are visited the most) in order to optimize the functioning of the website.

## **How to manage cookies**

- ◆ **Disabling Cookies:** Most web browsers automatically accept cookies, but if you prefer, you can edit your

browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our website who disable cookies will not be able to browse certain areas of the website.

- ◆ **Decline or accept cookies:** You are able to accept or decline cookies when you enter BELITE's website and see the cookies notice. If you change your opinion, you are also able to come back to your preferences at all times.

### **Third Party Analytics**

We use automated devices and applications, to evaluate usage of our website. We also may use other analytic means to evaluate our Services. We use these tools to help us improve our Services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your personal information with these third parties.

## **3. HOW DO WE USE YOUR INFORMATION?**

We use personal information collected via our website for a variety of business purposes ("Business Purposes") described below, including to:

- **process, evaluate and respond to requests, inquiries and applications.**
- **provide information or any updates of our drug development and/or information about changes to our terms, conditions, and policies.**
- **identify and notify you of clinical trials which may be suitable for you to be invited to participate in.**
- **for other purposes for which we have obtained your consent.**

### **Legal Bases for Processing**

In respect of each of the purposes for which we use your personal information, the European General Data Protection Regulation requires us to ensure that we have a legal base for that use. When processing personal information, we rely on one of the following legal bases:

- ◆ **Contract:** We or our service providers may process your personal information in order to perform obligations under any contract, agreement or transaction with you. This would be the case when BELITE organizes your participation in one of our events.
- ◆ **Consent:** We may rely upon your specific consent to use your personal information in a specific purpose. You may withdraw this consent at any time by contacting us using the [contact details](#) provided below , provided that such withdrawal will not affect any use or processing of your personal information prior to receipt of your withdrawal. Consent would apply when we send you newsletters or when you contact us through our Contact IR Form.

- ◆ **Legitimate Interests:** We may process your personal information when it is reasonably necessary to achieve our legitimate interest such as the Business Purposes outlined in Section 3, for example to answer to your queries either by email or through the contact form, including for job application.
- ◆ **Legal Obligations:** We may disclose your personal information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

#### **4. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

We do not share or otherwise disclose personal information we collect from or about you except as described below:

- ◆ **Vendors, Consultants and Other Third-Party Service Providers.** We may share your personal information with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. When we do, we require those third parties to handle it in accordance with relevant laws. However, we do not sell, rent or share any of your personal information with third parties for their direct marketing purposes unless we have your permission or as provided in this Privacy Policy.
- ◆ **Business Transfers.** We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- ◆ **Affiliates.** We may share your personal information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

#### **5. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

- a) Our office is located in the United States and may use service providers that operate in other countries. Your personal data may be transferred to the United States or other locations where privacy laws may not be as protective as those in your location. However, we will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is stored or processed. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your information. These data transfer, storage and processing also apply to the data you consent to share with us. If you are not in agreement, please do not submit your personal information on the website.

- b) For UK, Switzerland and EEA data subjects, there are situations where your personal data may be transferred to third parties through the use of products or services integrated on our Website. For further information, please refer to our Cookie Notice.

Sharing your personal data as explained above may involve a transfer of personal data to a country outside the European Economic Area (EEA), and/or the UK, and/or the Switzerland. BELITE is therefore committed to complying with the transfer rules under applicable Data Protection Laws.

You can contact us (see contact details below), if you want to have more details about the mechanism supporting data transfer

## **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements) or until you withdraw your consent (e.g. when subscribing to our newsletter)

When we have no ongoing legitimate business need to process or legal obligation to retain your personal information, we will either delete or anonymize it. The deletion of records containing personal information is conducted in a secure manner.

## **7. HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. Your personal data are contained behind secured networks and are only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential.

Please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our website is at your own risk. You should only access our website within a secure environment.

## **8. DO WE COLLECT INFORMATION FROM MINORS?**

We do not knowingly collect personal information from children under 13 years of age (“Child” or “Children”). If we become aware that a Child has provided BELITE with personal information without prior parental consent, we will remove all personal information provided by such underage user from our database. If you believe we have

collected personal information about your Child without your consent, you may contact us using the [contact details](#) provided below, and request that we remove information about your Child.

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (such as the European Economic Area), you have certain rights under applicable data protection laws. These may include:

- (i) to request access and obtain a copy of your personal information.
- (ii) to request correction, update or deletion of your personal information.
- (iii) to object to our reliance on our legitimate interests as the basis of our processing of your personal information.
- (iv) to withdraw your consent at any time, where we are relying on your consent to process your personal information. Please note that this will not affect the lawfulness of the processing before its withdrawal.
- (v) to restrict the processing of your personal information; and
- (vi) if applicable, to data portability.

To make such a request, please use the [contact details](#) provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If you have any questions or concerns about our Privacy Policy or data processing or if you would like to make a complaint about a possible breach of our Privacy Policy, please contact us using the [contact details](#) provided below. You also have the right to complaint to the [Ombudsman](#) under the Cayman Island Data Protection Law.

You also have the right to lodge a complaint if you consider that your personal data is not processed in accordance with the GDPR, the UK GDPR, the FADP and the CCPA/CPRA.

- If you are an EEA resident: You have the right to lodge a complaint with the Supervisory Authority in the Member State of the European Union of your habitual residence, place of work or place of the alleged infringement.
- If you are a UK resident: you may file a complaint with the Information Commissioner's Office ("ICO"), the Supervisory Authority of UK, following the instruction available in the service channels.
- If you are a Swiss resident: you may lodge a civil claim in case of personality rights' infringements, in particular, regarding the exercise of your rights of access, rectification and object but also regarding infringements related to data privacy principles. The competent Supervisory Authority in Switzerland is the Swiss Federal Data Protection and Information Commissioner.

## **Additional Rights for California Residents**

If you are a California resident, you have specific rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA). These rights apply to certain personal information we collect, use, and disclose about you, including the right to know what personal information we collect, use, disclose, and share; to opt out of the sale or sharing of personal information; and to limit the use of sensitive personal information (where applicable). You may also request, once per year and free of charge, details regarding our disclosures of personal information (if any) to third parties for their own direct marketing purposes during the previous calendar year. However, we do not sell or share your personal information with third parties for their direct marketing purposes unless we have your permission or as provided in this Privacy Policy.

To exercise any of these rights, please contact us using the [contact information](#) provided below. We will respond in accordance with applicable California privacy laws.

Please note that all these rights are not absolute and will be assessed on a case-by-case basis

## **10. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. Many websites and applications, including our website, do not currently respond to web browser DNT signals because such signals are not yet uniform. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

## **11. DO WE MAKE UPDATES TO THIS POLICY?**

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we protect your information.

## **12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may contact our Data Protection Officer (DPO), by email at [belitebio.dpo@mydata-trust.info](mailto:belitebio.dpo@mydata-trust.info) or write to us at:

Belite Bio, Inc.

Data Protection Officer

12750 High Bluff Drive, Suite 475

San Diego CA, 92121 USA