GRIN THERAPEUTICS, INC. HEALTHCARE PROFESSIONAL PRIVACY NOTICE

Last updated: 26 October 2026

This Healthcare Professional Privacy Notice ("**HCP Privacy Notice**") informs you of our processing and use of your personal information - within the meaning of applicable U.S. federal and state privacy laws (collectively, "**U.S. Privacy Laws**") - in your capacity as physician or other healthcare professional, including when you operate on behalf of the Healthcare Organisation (i.e. hospital) you work with. It also tells you about the rights you have with regard to the processing of your personal information.

- For the purposes set forth herein, GRIN Therapeutics, Inc., whose registered headquarters are located at 230 Park Avenue, Suite 2830, New York, NY 10169, The United States, is the entity responsible for determining the purposes and means of processing your personal information (referred to under applicable U.S. privacy laws as the "business" or "controller").

hereinafter referred to as "GRIN Therapeutics" (or "us", "we", or "our").

What personal information we process

Personal information is all data that identifies you directly or in combination with other data. The personal information we collect, store and use includes:

- **Contact information and job role**, such as your email address, name, professional phone number, medical ID number, postal address, information about your function, such as your title, self-employed or hospital employment status, country of business, position, role, name of the company/ institution you work for, specialty area and degree;
- **Information on our interactions**, such as information about the activities and interactions you have with us, information about the programs and activities in which you have participated, your prescribing of our products and the agreements you have executed with us and other information you provide to us (e.g. in emails, on phone calls, in research projects, or in other correspondence with us or our service providers or business partners);
- **Areas of medical/scientific interest**, such as your interest in and participation to scientific or medical events/topics in the field of neurology and neurodegenerative diseases and information provided to register for medial scientific and educational materials and newsletters;
- **Websites usage information and cookies**, such as information that we collect when you use our websites, like IP domain, how you interact with our websites, and cookies preferences; and
- **Publicly available information,** such as publications, your affiliation to scientific/ medical networks and comments describing support for and experience with our products.

The personal information is generally collected from you directly or from professional business partners that work together with us and that may share your personal information based on the agreement that you have with such business partners. We may also collect

personal information from publicly available sources, such as professional social networks and your organization's website.

There is no obligation to provide personal information to us. However, not providing certain personal information may prohibit us from engaging with you, or entering into an agreement with you.

How we use your personal information

We will collect your personal information for a specific purpose and only process the personal information which is relevant to achieve that purpose. In particular, we process your personal information for the following purposes:

1. **Maintaining our professional relationship** (e.g. manage and update our global Customer Relationship Management system, organize and manage visits and calls, communicate with you about upcoming meetings and events for which you have registered and sending customer surveys). Our processing of your personal information is necessary to serve our legitimate interests to improve our products and services as well as maintain and grow our relationship with you.
2. **Communicating with you**: (e.g. contact you for important medical or safety information, medical information, respond to your queries and provide you with requested support). Our processing of your personal information is necessary (a) for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract; (b) serve our legitimate business interests to respond to your questions; and (c) comply with our legal obligations to provide you updated safety information or manage product recalls.
3. **Exchange information within Neurvati group of companies**: (e.g. exchange your contact details and other information about the relationship with you with other companies of the Neurvati group (including Grin, as part of the Neurvati Group), in their capacity either as data controllers or data processors). Our processing of your personal information is necessary to serve our legitimate business interests to centralize data processing activities, the implementation of organizational and security measures at group level and allow cross-company teams to work together efficiently.
4. **Report safety and quality issues**: (e.g. comply with the requirement to report product complaints and safety issues). Our processing of your personal information is necessary to comply with a legal obligation on pharmacovigilance and quality of medicinal products.
5. **Meet industry guidelines relating to transparency** (e.g. track and disclose the values we transfer to you in our interactions with us): Our processing of your personal information is necessary to serve our legitimate business interests to comply with industry requirements/guidelines and to conduct our business in a transparent manner.
6. **Research and analysis** (e.g. improving, developing and customizing our products and services and analyzing our dataset, obtaining your professional insight, perform market research, registry and real world evidence studies, define new target populations and/or indications and improve patients' health conditions and quality of life). Our processing of your personal information is necessary to serve our legitimate interests of improving or developing products and services. If required under applicable laws, we will obtain your consent for such research and analysis purposes.
7. **Exchange medical scientific materials, information and invitations to industry, academic and scientific events**: (e.g. providing scientific/educational materials, publications and newsletters, real-world data and information on a particular

scientific or medical topic and/or event in the field of neurology and neurodegenerative diseases). Our processing of your personal data is based on our legitimate interest to provide medical/scientific information and invitations to scientific events that you request from us. This is not subscription based.

8. **Manage digital interactions**: (e.g. inviting to you to participate to online meetings and webinars, including those organized by third party business parties instructed by us to develop and/or host meetings and webinars, and in line with your medical scientific and marketing preferences). Our processing of your personal information is necessary to serve our legitimate interests to allow meetings and webinars to be performed through digital platforms;

Data sharing

We may share personal information with parties that we trust or when we are required to share personal information according to applicable law, including:

- **Group companies**: we may share certain personal information with our group companies to develop and maintain our business for purposes consistent with this HCP Privacy Notice and to ensure compliance with legal and regulatory obligations to which we or our group companies are subject;
- **Authorities**: we may share your personal information with governmental authorities, public institutions, financial authorities, prosecutors, courts and regulatory bodies to the extent this is required under applicable laws, legally binding orders or regulatory guidance. We may also transfer personal information to authorities to protect our rights and property, or the rights and property of third parties, for instance in case of legal proceedings;
- **Service providers**: we may use third party service providers to help us achieve the purposes set out in this HCP Privacy Notice. We require our service providers to respect the security and confidentiality of your personal information and to process personal information in accordance with applicable laws;
- **Business transfers**: we may sell, transfer or otherwise share some or all of our business or assets, including personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. We will inform you of such business transfers in accordance with applicable laws.

International transfers

We use a global Customer Relationship Management system, which means your personal information may be transferred to, stored in, or accessed from countries other than the United States, including by our group companies and third-party service providers located abroad. When we transfer personal information internationally, we use contractual and organizational safeguards designed to protect your personal information consistent with this HCP Privacy Notice. Where a transfer would involve a country or person subject to restrictions under U.S. law — including the U.S. Department of Justice's Data Security Program governing bulk sensitive personal information transfers to countries of concern — we evaluate and structure the transfer to comply with those restrictions.

If you have questions about the international transfer of your personal information or the safeguards that we have taken to protect it, please send an email to grin.privacy@mydata-trust.info.

Data Retention

We will only retain your personal information for as long as reasonably necessary and proportionate for the purpose for which we process it, in accordance with our retention policy, or for as long as we are required to retain it in accordance with applicable laws. In general, we retain your information for the duration of the relationship with you and for 5 years after the relationship with you ends, in order to comply with our legal and regulatory obligations and to establish, exercise or defend legal claims. We may retain your information for longer where this is necessary to perform a contractual obligation or to comply with a legal obligation (e.g., personal information processed for pharmacovigilance purposes is retained in accordance with applicable safety reporting laws, for at least 10 years beginning with the end of the marketing authorization of the respective medicinal product). Where we are involved in, or reasonably anticipate, a legal claim, dispute, government investigation or audit, we will retain the relevant information until the matter has been fully resolved, including any appeals.

When we no longer require your personal information, we will either delete or de-identify it or, if this is not possible (for example, because your personal information has been stored in backup archives), securely store and isolate it from any further processing until deletion is possible.

If you have questions on the retention of your personal information, please send an email to grin.privacy@mydata-trust.info.

Your rights in relation to our processing of your personal information

As a matter of company policy, we extend the following privacy rights to healthcare professionals in the United States, regardless of state of residence, consistent with U.S. state consumer privacy laws such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act (referred to under that law as “personal information”). Subject to certain exceptions, you have the right:

- to know and obtain a copy of the personal information we have collected about you (right to know/access);
- to request that we correct inaccurate personal information we maintain about you (right to correct);
- to request that we delete personal information we have collected from or about you (right to delete);
- to opt out of the “sale” or “sharing” of your personal information and of its use for cross-context behavioral or targeted advertising (right to opt out);
- not to be discriminated against for exercising any of these rights (right to non-discrimination); and
- to designate an authorized agent to submit a request on your behalf, and to appeal a decision we make in response to your request.

Where we ask for your consent for a particular activity (for example, certain scientific communications, or audio-video recording), you may withdraw that consent at any time with effect for the future, by contacting us as described below. Please note that if you withdraw your consent, we may still need to process certain personal information relating to you where we have another basis for doing so, such as to perform a contract with you or to comply with a legal obligation.

We do not sell your personal information, share it for cross-context behavioral advertising, or use it for targeted advertising, and we have not done so in the past 12 months.

If you want to exercise any of the above rights, or to appeal a decision we have made on your request, please contact us at grin.dpo@mydata-trust.info.

If you remain dissatisfied with our response to a rights request, you may contact the Attorney General of your state of residence.

If you have any questions regarding this HCP Privacy Notice or on how we process your personal information you can use the contact information below: GRIN Therapeutics, Inc. 230 Park Avenue, Suite 2250, New York, NY 10169, The United States.

You can also contact GRIN Therapeutics' Privacy Officer by writing to grin.dpo@mydata-trust.info.

Changes to this HCP Privacy Notice

We may update this HCP Privacy Notice from time to time. We will notify you of any material changes in advance through our usual communication channels (e.g. by post, email or via our internet websites). We encourage you to periodically review this HCP Privacy Notice to learn how we use your personal information.