

LYRA THERAPEUTICS, INC. –PRIVACY POLICY

Last updated: *February 13, 2023*

Lyra Therapeutics, Inc. (“**we**”, “**our**”, “**us**”) is committed to protecting and respecting your privacy. We are a public company established in the United States of America with a registered office at 480 Arsenal Way, Watertown, MA 02472, and for the purpose of applicable data protection laws, we are the data controller.

This Privacy Policy sets out the basis on which we will process any personal data or usage information we collect from you, or that you provide to us, in connection with your use of our website www.lyratx.com (our “**Website**”).

Please read this Privacy Policy carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process your personal data. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website or otherwise provide your information to us. This Privacy Policy supplements any other privacy related notices and policies we may provide to you from time to time, and is not intended to override them, including any informed consent form or patient information leaflet provided to you in connection with your participation in any clinical trial sponsored by us.

Our Website is not intended for use by children, and we do not seek or knowingly collect data relating to children through our Website. Children must not use the Website, except where their parent or guardian has provided consent, if this option is available in your location. If you use our Website, you represent that you are at least the age of majority under the laws of the jurisdiction of your place of residence. If we learn that we have collected or have been sent personal information about or from a child, we reserve the right to delete that personal information as soon as reasonably practicable. If you believe that we might have collected or been sent information from a child, please contact contactus@lyratx.com as soon as possible.

We change our Privacy Policy from time to time, in which case we will update the “Last Updated” date at the top of this Privacy Policy. Updates to our Privacy Policy will apply only to information collected after the date of the change. We will note on our Website when our Privacy Policy has been updated. Please check the Website regularly for notices of changes to our Privacy Policy. If we make material changes to the way in which we use information we collect, we will use reasonable efforts to notify you (such as by emailing you at the last email address you provided us, by posting notice of such changes on the Website, or by other means consistent with applicable law) and will take additional steps as required by applicable law.

1. THE INFORMATION WE COLLECT

Information you give to us

We collect certain information directly from you when you choose to communicate with us, for example, when you send a message to our e-mail address or when you sign up for our newsletters or alerts, such as our investor email alerts. We may collect your basic contact details, including name and e-mail address, from such communications and any other information provided by you when contacting us. This information is required to enable us to contact you and respond to your queries or, if you are an investor, to provide you with email alerts. If you do not provide this information, we will not be able to respond adequately to your queries.

We also collect information you provide as part of your application for a job posted on our Website. This includes information you provide when you use the job application portal on our Website, such as your name, email address, telephone number, social media profiles, resume/CV, cover letter and gender. Where permitted by local law, you have the option of providing certain sensitive personal data with your consent for the purposes of equal opportunities monitoring, including your veteran status, disability status and ethnicity. If you decide not to provide this data, your application will not be prejudiced.

Information we collect automatically

When you visit our Website we automatically collect the information sent to us by your computer, mobile phone or other device. This information may include: (i) your IP address; (ii) device information including, but not limited to, name and type of operating system; (iii) mobile network information; (iv) standard web information such as your browser type and the pages you access on our Website; (v) security information including a list of certain installed software, device and internet connection information, and available space on the device.

2. HOW DO WE USE YOUR INFORMATION?

We process your personal data in order to perform our contract with you, such as:

- provide you with our content and Website functionality;

Where required by applicable law, we will obtain your consent to provide you with certain services such as updates related to our news / press releases. You can opt-out of our emails at any time using the “unsubscribe” feature

As a matter of our legitimate interests, we use your personal data in order to be responsive to you and to maintain our relationship including:

- to respond to your message;
- for internal business analysis or other business purposes consistent with our mission; and
- to identify and evaluate you for employment positions and determine and validate your qualifications for employment.

We may also use your personal data for related purposes, such as to:

- conduct background checks including, to the extent permitted under applicable law (including checking references, qualifications, criminal records checks);
- if you are a successful candidate, create an employment record;
- administer the Website and for internal operations, in order to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis;
- maintain the safety and security of our users, the Website, and business;
- send you announcements in relation to security, privacy or administrative related communications (these communications are not marketing orientated, and we do not rely on consent, so you may not opt out);
- personalize our Website to ensure content is presented in the most effective manner for you and your device; and

- improve and develop our Website.

In addition, we will use some or all of the above information to comply with any applicable legal obligations, to enforce any applicable terms and conditions and/ or terms of service, and to protect or defend our business, our rights, the rights of our users, or others.

3. DISCLOSURES AND TRANSFER OF INFORMATION

In certain circumstances, we will share your personal information with third parties with your consent, as necessary, or as otherwise required or permitted by law including, as applicable from time to time:

- (a) ***With services providers and vendors, in our legitimate interests.*** Such third parties include: (i) data analytics vendors; (ii) security vendors; (iii) website hosting vendors; (iv) Notified, who manages our Investor Relations portal; and (v) Paylocity who manages our job applications portal. These service providers assist us with many different functions and tasks, such as providing data storage and disaster recovery services and communicating with you.
- (b) ***For legal and security reasons and to protect our services and business, in our legitimate interests or as required by law.*** We will share your personal data with regulators, law enforcement agencies, public authorities, or any other relevant organisations: (i) in response to a legal obligation; (ii) if we have determined that it is necessary to share your personal data to comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries; (iii) to protect the interests of, and ensure the safety and security, of us, our users, a third party or the public; (iv) to exercise or defend legal claims; and (v) to enforce our terms and conditions, other applicable terms of service, or other agreements.
- (c) ***With background check providers, in our legitimate interests.*** We will share your personal data where required to verify the information that you provided as part of your job application.
- (d) ***With referees, in our legitimate interests.*** We will share your personal data where required to identify you so they can provide a reference in relation to your job application.
- (e) ***With professional advisors, in our legitimate interests or as required by law.*** As necessary, we will share your personal data with professional advisors functioning as service providers such as auditors, law firms, or accounting firms.
- (f) ***With our affiliates, in our legitimate interests.*** We may share your personal data with companies within our corporate family.
- (g) ***In connection with an asset sale or purchase, a share sale, purchase or merger, bankruptcy, or other business transaction or re-organisation, in our legitimate interests.*** We will share your personal information with a prospective buyer, seller, new owner, or other relevant third party as necessary while negotiating or in relation to a change of corporate control such as a restructuring, merger, or sale of our assets.

4. WHERE WE STORE YOUR INFORMATION

As we are an US-based business, if you are accessing the Website from the European Economic Area (EEA) or the United Kingdom (UK), your personal information will be stored at/processed with our third party cloud storage vendor, on servers located in the United States. Your personal information is also processed by staff operating outside the EEA and the UK who work for us or one of our third party service providers or partners.

As a result, if you are accessing the Website from the EEA or UK, we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy. Where required under applicable laws, you consent to the transfer of information to the U.S. or any other country in which we or our affiliates or service providers maintain facilities.[For any transfers of personal information outside the EEA or the UK to third parties and/or affiliates, the data transfer will be under the European Commission’s model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses) (the “**Model Clauses**”), or the UK’s International Data Transfer Agreement or International Data Transfer Addendum to the Model Clauses, as relevant, unless the data transfer is to a country that has been determined by the European Commission or the relevant UK authorities, as applicable, to provide an adequate level of protection for individuals’ rights and freedoms for their personal data. Please contact us at contactus@lyratx.com should you wish to examine a copy of the Model Clauses.

We use cookies and similar tracking technologies to track the activity on the Website and hold certain information including your browsing activities over time and across different websites. Cookies are files with small amounts of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze the Website.

Do Not Track

Your browser settings may also allow you to transmit a “Do Not Track” signal when you visit various websites. Like many websites, our Website is not designed to respond to “Do Not Track” signals received from browsers. To learn more about “Do Not Track” signals, you can visit <http://www.allaboutdnt.com>.

5. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will only keep your personal data 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).

We will also retain and use your personal data to the extent necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions, other applicable terms of service, and our policies.

After the expiry of the retention periods specified above, we will store your information in an aggregated and anonymised format that does not permit your continued identification.

6. SOCIAL FEATURES

Certain features of our Website permit you to initiate interactions between the Website and third-party services or platforms, such as social networks (“**Social Features**”). Social Features include features that allow you to click and access our pages on certain third-party platforms, such as LinkedIn, and from there to “like” or “share” our content on those platforms. Use of Social Features may entail a third party’s collection and/or use of your data. If you use Social Features or similar third-party services, information you post or otherwise make accessible may be publicly displayed by the third-party service you are using. Both we and the third party may have access to information about you and your use of both the Website and the third-party service. For more information on third-party services and platforms, see the section below, *Third Party Websites and Links*.

7. THIRD PARTY WEBSITES AND LINKS

We may provide links to websites or other online platforms operated by third parties. If you follow links to sites not affiliated or controlled by us, you should review their privacy and security policies and other terms and conditions. We do not guarantee and are not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of information found on these sites. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as LinkedIn) may also be viewable by other users of the Website and/or users of those third-party platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators, except as disclosed on the Website.

8. SECURITY

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal data we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Website . Any transmission is at your own risk.

9. YOUR RIGHTS

If you are located in the EEA or the UK, You have certain rights in relation to your personal data:

- **Access:** You have the right to access personal data we hold about you, how we use it, and who we share it with.
- **Portability:** You have the right to receive a copy of the personal data we hold about you and to request that we transfer it to a third party, in certain circumstances and with certain exceptions.
- **Correction:** You have the right to correct any of your personal data we hold that is inaccurate.
- **Erasure:** In certain circumstance, you have the right to delete the personal data we hold about you.
- **Restriction of processing to storage only:** You have the right to require us to stop processing the personal data we hold about you, other than for storage purposes, in certain circumstances.
- **Objection:** You have the right to object to our processing of your personal data.
- **Objection to marketing:** You can object to marketing at any time by opting-out using the unsubscribe/ opt-out function displayed on our Website or in our communications to you].

Please note that a number of these rights only apply in certain circumstances, and all of these rights may be limited by law. For example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests or where we are required by law to retain your personal data.

To exercise any of these rights, you can contact contactus@lyratx.com. We will respond to requests to exercise these rights without undue delay and at least within one month (though this may be extended by a further two months in certain circumstances).

10. YOUR CALIFORNIA PRIVACY RIGHTS

We do not share personal information as defined by California Civil Code Section 1798.83 (“**Shine The Light Law**”) with third parties for their direct marketing purposes.

11. COMPLAINTS

If you have complaints about how we process your personal data, please contact us at contactus@lyratx.com and we will respond to your request as soon as possible.

If you think we have infringed data protection laws, you can file a claim with the data protection supervisory authority in the EEA country in which you live or work or where you think we have infringed data protection laws, or with the UK Information Commissioner’s Office, as applicable to you.

12. CONTACT

We welcome your questions, comments, and concerns about this Privacy Policy or your personal data. Please send us any feedback to contactus@lyratx.com.

Our EU and UK representative(s) is MyData-TRUST who can be contacted at MyData-TRUST SA Boulevard Initialis, 7 bt 3 – 7000 Mons (BELGIUM) email: lyratx.dpo@mydata-trust.info

Except as otherwise prescribed by applicable law, in the event of any inconsistency between the English language version and local language version of this Privacy Policy, the English language version will prevail.