

ADAGIO PRIVACY POLICY

1.0 INTRODUCTION

1.1 Purpose:

This Privacy Policy explains how Adagio Therapeutics, Inc. (“Adagio”) collects, uses, and discloses Personal Data (as defined below) about you that we obtain when you access and interact with this website and other applications, including mobile applications (collectively “Site”), that directly link to this statement. Adagio respects the privacy of visitors to the Site, and we recognize the need for appropriate protection and management of the Personal Data you share with us. It is Adagio’s policy that the Personal Data collected will be used for limited purposes. Adagio respects the personal and private nature of this information and we are committed to appropriately protecting the Personal Data that we collect and to using it in compliance with applicable privacy laws and regulations as well as Adagio corporate policies and procedures. This Privacy Policy also answers certain specific questions that you may have regarding privacy and security of Personal Data.

1.2 Scope:

This Privacy Policy applies to the operation of this Site. BY ACCESSING OR USING THE SITE, YOU CONSENT TO OUR COLLECTION, USE, AND SHARING OF YOUR INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. Please read this Policy carefully before using the Site or submitting Personal Data to us. This Policy is incorporated into and subject to the Terms of Use.

2.0 POLICY

2.1 Types of Personal Data Adagio May Collect:

This Policy defines and provides examples of Personal Data that we may collect, and also explains our practices regarding that Personal Data. Personal Data is any information that can be used to identify, locate, or contact you. It also includes other information that may be associated with such Personal Data. Examples of types of Personal Data that we may collect include the following:

- 2.1.1 Contact Data, which includes information such as your name, email address, mailing address, zip code, phone numbers or country.
 - 2.1.2 Relationship Data, including information about products, treatments and health conditions that are of interest to you.
 - 2.1.3 Transaction Data, including purchases, inquiries, and information about how you use the Adagio websites and mobile applications.
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- 2.1.4 Geo-location Data, such as information about your physical location collected from geolocation features on your device, including your IP address and as otherwise may be transmitted to us by your smart phone or other location-aware devices.
- 2.1.5 Internet/Network Information, such as your IP address (a unique identifier that devices use to identify and communicate with each other on the Internet), or browser or device information.
- 2.1.6 Job Applicant Data, such as your Contact Data, resume, previous work experience, education, transcript, driver's license information, Social Security number or national identification number and information relating to references.
- 2.1.7 Protected Classification/Characteristic Data, such as age, gender, and disability information, and/or:
- 2.1.8 Statistical Data, to monitor utilization of the Site and continuously improve its quality, we may compile statistical information concerning the usage of the Site using analytics services. Examples of this information include: the number of visitors to the Site or to sections or pages within the Site, patterns of traffic flowing through the Site, length of time spent on the Site or in sections or pages of the Site, the other sites that refer visitors to the Site, the pages of the Site that visitors frequently use as entry and exit points, utilization of the browser and operating systems and versions used by visitors to the Site, methods used to browse away from the page, any phone number used to call our customer service number, and location information.

2.2 Additional Personal Data that Adagio may Collect about Healthcare Professionals:

If you are healthcare professional, we may collect Personal Data about you directly from you, or from third-party sources such as the organization where you work, publicly available sources, interactions with Adagio (including online available sources), and participation in Adagio-sponsored or Adagio-supported initiatives such as clinical research and development activities, third-party databases, and reporters of pharmacovigilance events.

We may collect the following additional categories of Personal Data about health care professionals:

- 2.2.1 Professional details, such as resumes or other documents or forms provided directly to us, place of practice, job title, professional contact details, medical specialty, professional license number, professional qualifications and scientific activities (such as previous clinical trial experience, activity on social media platforms or other websites, and participation in past or pending research studies with us and other companies), organizational or institutional affiliations, publication of academic or scientific research and articles, and membership in associations and boards;
 - 2.2.2 Personal Data, such as that provided to participate in our sponsored or supported initiatives, such as our sponsored clinical research and development activities, online or in-person seminars regarding product information, educational events, and clinical information updates;
 - 2.2.3 Details of interactions with us, such as what kind of meetings we have held, topics discussed, your knowledge of and questions you have had about our business and
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products, what kind of material we have displayed to you, and any feedback that you have provided, as well as your opinions of and routines for prescribing, routines regarding your patients, diagnoses, and automatic tracking information in online interactions with us; and/or

- 2.2.4 Payment and other transfers of value details received from your interactions with Adagio, which may include your tax identification number or national identification number (where required or permitted by law), contributions to costs of educational events (such as registrations fees, travel and accommodation expenses) and fees for services, including consultancy services.

2.3 How Adagio Collects Personal Data:

Adagio may collect your Personal Data from multiple sources, including directly from you when you voluntarily submit it to us or that we ask you for when you interact with us. We also obtain your Personal Data from our business partners and affiliates, third parties you direct to share information with us, your browser or device, information generated from your online browsing and usage activity, or from public third-party sources such as LinkedIn.

We may also obtain Personal Data on healthcare professionals from third party sources. This information is used to verify such things as professional status, state license information, identity and specialty when providing tailored information, communications or products/and or services to healthcare professionals.

If you interact with us online, we use cookies and other technological tools to collect data about your computer and your use of our website and applications. If you use a mobile application that Adagio has developed, that application will inform you of the data that the mobile application collects and what information it may transfer to Adagio. We treat this data as Personal Data, only when it, or other data that is associated with it, can be used to identify you. For more information about cookies and other technologies, please see the “Cookies and Other Data Collection Technologies” section below.

2.4 How Adagio Uses Personal Data:

Adagio may use your Personal Data for its business purposes, such as:

- 2.4.1 To respond to your inquiries about our products, services, or to provide you with information that you have requested.
 - 2.4.2 To provide you with disease state and other general healthcare-related information.
 - 2.4.3 To provide you with promotional materials, marketing communications, offers for products and services, or to determine if you are eligible for certain products, services, or programs such as patient savings or patient assistance programs.
 - 2.4.4 To deliver our products or services to you and to bill you for them.
 - 2.4.5 To administer promotional programs, such as sweepstakes, rewards, and rebate programs.
 - 2.4.6 If you have a business or professional relationship with Adagio, to develop our business relationship with you.
 - 2.4.7 If you apply for a job via our career center, to consider you for employment.
 - 2.4.8 For our regulatory compliance, clinical trials, and research and development efforts.
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- 2.4.9 To monitor and analyze our respective business operations and website and other applications usage.
- 2.4.10 To anonymize data so that it is no longer Personal Data.
- 2.4.11 For product safety, such as adverse event reporting, product complaint reporting, or to communicate product safety information to you; and/or:
- 2.4.12 Website administration, fraud prevention, corporate governance, reporting, and legal compliance.

2.5 Additional Uses and Disclosures of Healthcare Professional Personal Data:

Adagio may use and disclose Personal Data of health care professionals for the following additional purposes.

- 2.5.1 For the performance of our contract with you if you or your institution entered into a consulting, professional services, or other type of agreement with us.
 - 2.5.2 Based on our legal obligations and for reasons of public interest, we will use and disclose Personal Data about health care professionals for:
 - Safety monitoring, reporting and auditing and responding to inquiries or issues in relation to our products.
 - Complying with applicable laws and regulations, including requirements imposed by industry codes of conduct to collect payment and other transfer of value data of health care professionals and the public disclosure of such data, subject to applicable local consent requirements to publish such data in a manner that identifies the health care professional individually.
 - 2.5.3 Based on our legitimate interests in developing and improving our services, we will use and disclose Personal Data about health care professionals for:
 - Managing and improving our relationship with you, including planning, organizing and reviewing any collaboration with you, and for contacting you.
 - Striving to ensure that we provide you with information that is relevant based on your expertise, interests and preferences.
 - Recruitment and evaluation of the suitability of healthcare professionals for their participation in clinical trials and market research and other research studies.
 - Conducting market and research studies in the public and private sectors.
 - Communicating with you about our products and programs (subject to any additional marketing consent requirements), engage with you about scientific or educational programs, administer our patient-support programs and provide access to you where applicable, respond to product orders, and provide product samples
 - Research and analytics purposes to develop and evaluate our products, services, materials and treatment, and/or:
 - Internal accounting and analysis in connection with our internal policies and rules, such as our Adagio Code of Business Ethics and Conduct.
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2.6 When and Why Personal Data Is Disclosed by Adagio:

Adagio does not sell, share, or otherwise distribute your Personal Data to third parties for their marketing purposes. Adagio will share your Personal Data with third parties only in compliance with applicable laws and regulations. For example, we may share your Personal Data as follows:

- 2.6.1 We may share your Personal Data with your consent or as you direct. For example, we may share data with your doctor as part of programs in which you agree to participate.
 - 2.6.2 We may share your Personal Data with our affiliated companies which may only use your Personal Data for the purposes listed herein.
 - 2.6.3 We may share your Personal Data with our service providers who act on our behalf and are bound by law or contract to protect your Personal Data and only use your Personal Data in accordance with our instructions. For example, we may share your Personal Data with vendors who provide data processing or fulfillment services for us such as services delivery, evaluating the usefulness of this website, marketing, data management or technical support.
 - 2.6.4 We may also disclose your Personal Data where needed to affect the sale or transfer of business assets, to investigate legal issues, enforce our rights, protect our property, or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions.
 - 2.6.5 We may also disclose your Personal Data when requested or required to do so by applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding in the United States and other countries where we operate.
 - 2.6.6 Please note that we may also disclose data about you that is not personally identifiable. For example, we may publish reports that contain aggregate and statistical data about our customers. These reports do not contain any data that would enable the recipient to contact, locate, or identify you.
 - 2.6.7 We may also disclose your Personal Data to try to protect you against, and to prevent, fraud, illegal activity (such as identifying and responding to incidents of hacking or misuse of our websites and mobile applications) and claims and other liabilities.
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2.7 Cookies and Other Data Collection Technologies:

When you visit our website or use our mobile applications, we may collect certain data by automated means, using technologies such as cookies that we may place on your computer when you visit our website, pixel tags, browser analysis tools, server logs and web beacons. We may collect data about the device you use to access our website, the pages you visit on our website, the length of time you spend on pages on our site, your operating system and platform type, browser type and version, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located and the date and time you visit our sites and the pages you visit. Our server logs also record the IP address of the device you use. We may also collect data about the website you were visiting before you came to Adagio and the website you visit after you leave our site.

Cookies are small pieces of data that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store data or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a customized experience and enable us to detect certain kinds of fraud. Cookies cannot read data off your hard drive. Your web browser may allow you to be notified when you are receiving a cookie, giving you the choice to accept it or not. You can also refuse all cookies by turning them off in your browser. By not accepting cookies, some features on our website may not fully function, and you may not be able to access certain information on this website. However, by continuing to use the site without changing settings, you are agreeing to our use of cookies as is.

Adagio may also make use of pixel tags and web beacons. These are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, the pixel tags and web beacons generate a notice of that action. These tools allow us to measure response to our communications and improve our web pages and promotions.

In many cases, the data we collect using cookies and other tools is only used in a non-identifiable way, without any reference to Personal Data. For example, we use data we collect about all website users to optimize our websites and to understand website traffic patterns.

In some cases, we do associate the data we collect using cookies and other technology with your Personal Data. This Policy governs how we use that data when we associate it with your Personal Data.

Adagio may have relationships with third party advertising companies that may place advertisements on some of our websites that may include this website and other websites, and to perform tracking and reporting functions for this website and other websites. These third-party advertising companies may place cookies on your computer when you visit our website or other websites so that they can display targeted advertisements to you, but we do not give or sell any Personal Data to them as part of this process. However, this Policy does not cover the collection methods or use of the data collected by these vendors. For more information about third party advertising, please visit the Network Advertising Initiative (NAI) at www.networkadvertising.org.

2.8 Social Media Plugins:

This website may use social medial plugins (e.g., the Facebook “Like” button, “Share to Twitter” button) to enable you to easily share information with others. When you visit our

website, the operator of the social plugin can place a cookie on your computer, enabling that operator to recognize individuals who have previously visited our site. If you are logged into the social media website (e.g., Facebook, Twitter) while browsing on our website, the social plugins allow those social media websites to share data about your activities on our website with other users of their social media website. For example, Facebook Social Plugins allows Facebook to show your Likes and comments on our pages to your Facebook friends. Facebook Social Plugins also allows you to see your friends' Facebook activity on our website. Adagio does not control any of the content from the social media plugins. For more information about social plugins from other social media websites you should refer to those sites' privacy and data sharing statements.

2.9 Do-Not Track Signals and Similar Mechanisms:

Some web browsers incorporate a Do Not Track (DNT) or similar feature that signals to websites with which the browser communicates that a visitor does not want to have his/her online activity tracked. If a digital service that responds to a particular DNT signal receives the DNT signal, the browser can block that digital service from collecting certain Personal Information about the browser's user. Websites linked to this Policy may not respond to these "do-not-track" signals.

2.10 Your Rights, Data Limitations and Opting-Out:

Whenever we obtain or process your Personal Data, we take steps designed to ensure that your Personal Data is protected, accurate and up-to date for the purposes for which it was collected. Per applicable law you have the right to access your Personal Data that we have collected. This includes the right to request that Adagio disclose to you the following: (1) the categories of Personal Data Adagio has collected about you; (2) the categories of sources from which the Personal Data is collected; (3) the business or commercial purpose for collecting Personal Data; (4) the categories of personal third parties with whom Adagio shares Personal Data; and (5) the specific pieces of Personal Data Adagio has collected about you. You also have the right to request that we delete or transfer your Personal Data to the extent that such deletion or transfer is technically possible or permitted by law. Adagio will not discriminate against you for exercising your privacy rights.

You also have the right to opt-out or unsubscribe from receipt of emails from us or amend your contact details and other Personal Data at any time by clicking the unsubscribe link included in future email communications. You can limit the data you provide to Adagio, but if you do so you may be unable to access some of the services, offers, and content on our websites.

While you can opt-out of promotional emails, we may still need to contact you with important transactional data about your account or your purchase. For example, even if you opt-out of emails we will still send you a confirmation when you purchase something from our website, a notification of changes to, expiration of, or discontinuation of a program you are enrolled in, and product safety communications.

You can manage cookie preferences and opt-out of having cookies and other data collection technologies used by adjusting the settings on your browser. All browsers are different, so visit the "Help" section of your browser to learn about cookie preferences and other privacy settings that may be available.

Finally, you can opt-out of being targeted by those third-party advertising companies that are NAI members online at www.networkadvertising.org.

2.11 Data Security:

Adagio has implemented a data security program that contains administrative, technical and physical controls that are designed to reasonably safeguard your Personal Data from unlawful use and unauthorized disclosure. However, no system is completely secure or error-free. We do not, and cannot, guarantee the complete security of your personal information.

2.12 Consent to Processing in the United States and Elsewhere:

This site is owned and operated by Adagio in the United States, but the data you provide may be accessible to our affiliates, vendors, and suppliers in other countries. Furthermore, if you are visiting this site from another country other than the United States, your communication with us will necessarily result in the transfer of data across international boundaries. The level of legal protection for Personal Data is not the same in all countries. However, we will take the security measures described in this Policy in an effort to keep your data secure. By using this site, you consent to the collection, storage, and processing of your data in the United States and in any country to which we may transfer your data in the course of our business operations.

2.13 Policies of Third Parties:

This Policy only addresses the use and disclosure of Personal Data by Adagio. We may provide links to outside websites or advertisements for third parties that have their own Policies regarding data collection, use and disclosure. The terms of usage and other conditions of use posted on those websites, and not the policies and procedures we described here, apply to those websites. We cannot guarantee the privacy standards of websites to which we link or be responsible for the contents of sites other than this one, and this Privacy Policy is not intended to be applicable to any linked, non-Adagio website. We encourage you to familiarize yourself with the Policies provided by all third parties prior to providing them with data or taking advantage of an offer or promotion.

2.14 Children's Privacy:

Adagio is committed to protecting the privacy of children. This website content and services are not intended for, or designed to attract, children under the age of 13. We do not knowingly collect any Personal Data of anyone under the age of 13, and no Personal Data should be submitted to Adagio through the website by visitors who are less than 13 years old. If it comes to our attention that someone under the age of 13 has volunteered personal data and/or health-related personal data, or that a healthcare professional has volunteered personal data about a patient who is younger than 13, without the given or authorized consent of the holder of parental responsibility over such child, we will promptly, upon relevant notification or request, delete such Personal Data from our systems. If you believe a child is using our website, please contact us either by e-mail or telephone at info@adagiotx.com, or 1-781-819-0080 so we can investigate and delete any inappropriate data.

2.15 Changes to this Policy:

Adagio may, at any time, revise this Privacy Policy by updating this posting. If we make revisions to this Privacy Policy, we will update the date of this Privacy Policy. We will continue

to use and/or disclose Personal Data in accordance with the version of this Policy that was in effect at the time the Personal Data collected, unless you have agreed to have an updated version of the Privacy Policy apply to the Personal Data collected while a prior version of our Privacy Policy was in force.

You understand and agree that your continued use of the Site on and/or after the effective date means that the collection, use, and sharing of your Personal Data is subject to the updated Policy.

Except to the extent we receive your authorization or as permitted or required by applicable law, we will handle your data in accordance with the terms of the Policy in effect at the time of the collection.

This Policy is governed by the internal substantive laws of the Commonwealth of Massachusetts, without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Privacy Policy shall lie exclusively with the state and federal courts within the Commonwealth of Massachusetts. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

Any portions of this Policy are void to the extent they are prohibited by applicable law.

2.16 How to Contact Us and Your Rights:

Please contact us if you have any questions or comments about our privacy practices, your privacy choices, or this Policy. You can always reach us by e-mail or telephone at info@adagiotx.com, or 1-781-819-0080. You may contact us to update or correct much of your Personal Data that you provided to us through the Site.

If you choose to contact us via mail at the address below, please provide your name, address, email address, and information about the communication that you do not want to receive.

Adagio Therapeutics, Inc.

Attn: Chief Financial Officer

303 Wyman St.

Unit 303

Waltham, MA 02451

2.17 Nevada Residents:

If you are a Nevada resident, you may have the following additional rights. Terms used in this section shall have the meaning ascribed to them by the applicable Nevada data protection law.

Do Not Sell: Adagio does not sell the covered information of Nevada residents. However, we are required by law to notify you of your right to submit a verified request instructing Adagio not to sell any of the covered information we have collected about you or will collect through our website. You may submit your request here: www.Adagiopharma.com/contact-us.

Access or Correct: You may ask to review or instruct Adagio to correct any of the covered information we have collected about you through our website by contacting us by e-mail or telephone at info@adagiotx.com, or 1-781-819-0080.
