Scholar Rock

Scholar Rock EMEA Healthcare Professional Privacy Notice

"EMEA HCP Privacy Notice"

Effective Date: 29th July 2026

1. Introduction and Scope

This EMEA Healthcare Professional Privacy Notice ("EMEA HCPs **Privacy Notice**") describes how Scholar Rock Ireland Limited and its affiliates (together, the **"Scholar Rock"**, **"we"**, **"us"**, or **"our"**) collect, use, share, and otherwise process personal data relating to healthcare professionals, within the meaning of the General Data Protection Regulation (EU) 2016/679 and the UK GDPR (collectively, "**GDPR**") as well as the Swiss Federal Act on Data Protection Act of 25 September 2020 (collectively, "**Applicable Privacy Law**").

This EMEA HCPs Privacy Notice applies when you interact with us in your capacity as a physician or other healthcare professional, including when you act on behalf of or in association with a healthcare organization (e.g. hospitals, clinics, academic institutions).

2. Data Controllers and Contact Information

The following entities act as separate and independent data controllers for the processing described in this EMEA HCPs Privacy Notice:

Entity	Registered Address
Scholar Rock Ireland Limited	Balheary Demense, Balheary Road, Swords, K67 E5a0, Co Dublin.
Scholar Rock Switzerland GmbH	c/o Lakeside Business Center AG, Landis + Gyr – Strasse 1, 6300 Zug.
Scholar Rock Germany GmbH	c/o Vistra (Germany) GmbH, Westendstraße 28, 60325 Frankfurt am Main.
Scholar Rock Italy S.r.l.	c/o Bird & Bird Società tra Avvocati S.r.l., Via Porlezza, 12, Milan, 20123, Italy.

Unless otherwise stated, each of these entities processes your personal data for the purposes described in this EMEA HCPs Privacy Notice.

You can contact Scholar Rock at any time at the postal address set out above or via email at legal@scholarrock.com.

3. Categories of Personal Data We Process

Scholar Rock

Depending on the nature of your interactions with us, we may process the following categories of personal data. Please note that certain processing activities carried out by Scholar Rock may be subject to separate privacy notices providing more specific information about the relevant processing. This includes, for example, the processing of personal data for pharmacovigilance, medical information inquiries, and product quality complaints. For further information, please refer to Scholar Rock's EMEA Pharmacovigilance, Medical Information Inquiries and Product Quality Complaints Privacy Notice.

Table 1 – Categories of Personal Data

Category	Description
Identification & Professional Details	Name, professional title, degree, specialty, medical/professional ID/registration number, hospital or affiliated institution, employment status (self-employed or employed), country of business.
Contact Information	Professional email address, professional telephone number, postal address.
Relationship & Interaction Data	Records of meetings, calls, visits, emails, event participation, surveys, correspondence, agreements, and your prescribing of our products.
Contractual & Financial Data	Contractual terms, billing and invoicing details, bank account information, tax identification number.
Media & Recordings	Photographs, audio and video recordings, including recordings of meetings, webinars, or presentations.
Communication Preferences	Preferred channels (email, SMS/WhatsApp, written correspondence), consent records and opt-in/opt-out choices.
Scientific & Medical Interests	Participation in scientific or educational events, research interests, registrations for medical/scientific materials and newsletters.
Marketing Preferences	Preferences relating to product-related communications, omnichannel preferences, newsletters, promotional materials
Segmentation & Profiling Data	Area of expertise, research focus, patient population size, participation in clinical trials or congresses, geographic scope, professional interests, number of patients, involvement in local/regional or national guideline development, participation in medical professional associations.
Digital & Website Usage Data	IP address, device data, browsing behaviour, cookie information, cookie consent and preferences, usage data relating to digital communications.

PV & Product Quality Report Data	Information contained in pharmacovigilance or product quality reports.

4. Sources of Personal Data

We collect personal data from the following sources:

- **Directly from you**, during interactions, registrations, contracts, communications, or events;
- **From professional data providers and business partners** (e.g. Veeva Open Data), where permitted by law and contractual arrangements between you and those providers;
- **From publicly available sources**, such as professional websites, publications, and professional social networks.

You are not legally required to provide personal data. However, failure to do so may limit our ability to engage with you or to enter into contractual arrangements with you.

5. Purposes of Processing and Legal Bases

We process your personal data only for **specified, explicit, and legitimate purposes**, and, when consent is required under Applicable Privacy Laws, based on your preferences, and always on an appropriate legal basis in compliance with Applicable Privacy Law.

Table 2 – Purposes, Data Categories, and Legal Bases (apply only when relevant)

Purpose	Categories of Data	Legal Basis
Professional Relationship Management	Identification & professional details, contact information, relationship & interaction data, segmentation & profiling data	Legitimate interests (Art. 6(1)(f) GDPR).
Verification & validation of status as licensed HCP	Identification & professional details, contact information	Legal obligation (Art. 6(1)(c) GDPR); Legitimate interests (Art. 6(1)(f) GDPR)
Contracting & Financial Administration	Identification & professional details, contact information, contractual & financial data	Contract performance (Art. 6(1)(b) GDPR); Legal obligation (Art. 6(1)(c) GDPR); Legitimate interests (Art. 6(1)(f) GDPR).

Medical Communications & Information	Identification & professional details, contact information, relationship & interaction data, scientific & medical interests, communication preferences, segmentation & profiling data, digital and website usage data and cookies	Contract performance (Art. 6(1)(b) GDPR); Legitimate interests (Art. 6(1)(f) GDPR); Legal obligation (Art. 6(1)(c) GDPR).
Med Info, Pharmacovigilance & Product Quality	Identification & professional details, contact information, relationship & interaction data, PV & product quality report data	Legal obligation (Art. 6(1)(c) GDPR).
Transparency & Industry Reporting	Identification & professional details, contractual & financial data	Legal obligation (Art. 6(1)(c) GDPR); Legitimate interests (Art. 6(1)(f) GDPR), Consent where required (Art. 6(1)(a) GDPR).
Scientific & Medical Engagement	Scientific & medical interests, relationship & interaction data, segmentation & profiling data	Legitimate interests (Art. 6(1)(f) GDPR); Consent where required (Art. 6(1)(a) GDPR).
Marketing Communications	Identification & professional details, contact information, marketing preferences, communication preferences, segmentation & profiling data, digital and website usage data	Legitimate interests (Art. 6(1)(f) GDPR); Consent where required (Art. 6(1)(a) GDPR).
Digital Meetings & Webinars	Identification & professional details, contact information, media & recordings	Legitimate interests (Art. 6(1)(f) GDPR); Consent where required (Art. 6(1)(a) GDPR).
Segmentation & Profiling	Segmentation activities based on non-invasive categories (including for personalised communications), segmentation & profiling data and cookies, identification & professional details, relationship & interaction data	Legitimate interests (Art. 6(1)(f) GDPR); Consent where required (Art. 6(1)(a) GDPR)
Website Analytics & Cookies	Digital & website usage data	Consent (Art. 6(1)(a) GDPR), except strictly necessary cookies.

Security & Fraud Prevention	Identification & professional details, digital & website usage data	Legitimate interests (Art. 6(1)(f) GDPR).
Legal Claims & Business Protection	Identification & professional details, contractual & financial data, relationship & interaction data	Legitimate interests (Art. 6(1)(f) GDPR).

Where consent is required under Applicable Privacy Law, you may withdraw it at any time with effect for the future. When we process your personal data to optimize our interactions and communications based on your preferences, you have the right to object to our processing of your personal data for such purposes at any time.

6. Digital communications, profiling and Opt-Out Rights

Subject to your consent for the processing of your personal data for proactive digital (medical, scientific and/or product related) information and communications, and as long as you have not withdrawn your consent and/or opted-out from receiving them, we perform segmentation activities to send you personalized communications based on your interests and preferences. On this basis, you may then receive by email and/or SMS and WhatsApp:

- **communications with medical scientific and educational materials and invitations to medical scientific/educational events;**
- **communications on Scholar Rock's products and services and invitations to events about Scholar Rock's products;**
- **information and invitations to research/development opportunities and market research projects from Scholar Rock and appointed vendors.**

For analyzing the usage and effectiveness of our communications, we will use tracking technologies, such as tracking pixels or similar technologies embedded in our messages, to collect information about your usage of the communications sent to you (e.g., whether you have received and opened the messages and/or whether you have clicked on links and content in our messages). This helps us to better understand the interests and preferences of the recipients of our communications, to tailor and personalize the content of our communications based on user segments according to your interests and preferences, and to optimize our information offering. By providing your consent to receiving our digital communications, you also consent to the related processing of your personal data (including the tracking and analysis of your usage behavior and our segmentation activities).

To this processing, you may **withdraw your consent** and **opt out at any time** by:

- Clicking the "unsubscribe" link in the relevant communication, or
- Contacting us at privacy@scholarrock.com, specifying, changing or updating your preferences.

Depending on the country where you are located, we may send you a confirmation request to the electronic contact address you provided when signing up to receive our digital communications which asks you to

confirm your consent. Your consent and confirmation, as well as any changes of your preferences or withdrawal of your consent, will be recorded in line with our legal obligations to document, and be able to demonstrate, your consent and communication preferences.

To ensure that our digital communications are sent only to licensed HCPs, to prevent the misuse of restricted medical or promotional content, and to comply with applicable industry standards and regulatory requirements, we will further process your personal data to verify and validate your status as a licensed HCP on the basis of the statutory legal bases indicated in section 5 above. This process may require sharing your data with a third-party service. We will store the results of such verification and validation as well as your communication preferences, to the extent and for as long as necessary to ensure and be able to demonstrate compliance with our legal obligations. You will be informed at the end of the validation process whether the validation was successful. If we cannot verify and validate your status, your personal data will be deleted in accordance with our internal deletion routines.

7. Data Sharing and Recipients

We may share your personal data with:

- **Group companies**, for internal administration and compliance with legal and regulatory obligations to which we or our group companies are subject;
- **Service providers**, acting on our behalf and under contractual safeguards. In this case, we require our service providers to respect the security and confidentiality of your personal data and to process personal data in accordance with applicable laws,
- **Regulatory authorities and public bodies** (including financial authorities, prosecutors, courts and regulatory bodies), where required by law or to protect our rights and property, or the rights and property of third parties, for instance in case of legal proceedings;
- **Third parties in corporate transactions**, such as mergers, acquisitions or restructurings; we will inform you of such business transfers in accordance with applicable laws.

8. International Transfers

Your personal data may be transferred to countries outside the EU, UK, or Switzerland, including the United States, where Scholar Rock global headquarter is based.

Such transfers are protected by:

- Adequacy decisions (Art. 45 GDPR), or
- Appropriate safeguards such as Standard Contractual Clauses (Art. 46 GDPR).

Where adequate safeguards cannot be ensured, we will request your explicit consent (Art. 49 GDPR).

9. Data Retention

We retain your personal data:

- For the duration of our professional relationship with you (unless you previously withdraw your consent);
- Generally, for up to **five (5) years** thereafter;
- Longer where legally required (e.g. pharmacovigilance data: **minimum 10 years** after marketing authorisation expiry);
- In case of a legal complaint or dispute, we would retain your personal data until a final, non-appealable, decision has been issued by the competent court.

Personal data is securely deleted, anonymised, or archived when no longer required, unless we can justify maintaining your personal data for longer based on other relevant legal basis (for example, legal obligations or performance of a contract).

10. Your Rights

Subject to Applicable Privacy Law, you may have the right to:

- to obtain information on and a copy of your personal data (right of access);
- to have any inaccurate personal data rectified and, having regard to the purposes of the processing, to have incomplete personal data completed (right to rectification);
- if there are legitimate grounds, to request the deletion of your personal data (right to erasure);
- to request the restriction of the processing of your personal data (right to restriction of processing);
- to receive the personal data provided by you in a structured, commonly used and machine-readable format and to transfer this personal data to another controller or, if technically feasible, to have it transferred by Scholar Rock (right to data portability);
- not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. There is no automated decision-making by Scholar Rock; and
- to submit a complaint with a data protection authority where you consider a breach of data protection law has occurred.

Where the processing of your personal data is based on your consent, you have also the right to amend or withdraw your consent at any time with effect for the future. Please note that if you withdraw your consent, we might still need to process certain personal data relating to you if there are other valid legal grounds, for example to comply with a legal obligation, to perform a contract with you or to pursue a legitimate business interest.

You further have the right to object, on grounds relating to your particular situation, at any time to any processing of your personal data we perform to pursue a legitimate business interest. Where your personal data are processed for direct marketing, proactive scientific communication and/or profiling purposes, you further have the right to object at any time to such processing.

In order to exercise your rights, including the withdrawal of your consent, please contact Scholar Rock using the contact details set out in Section 2 above.

11. Data Protection Officer

If you have any questions regarding this EMEA HCPs Privacy Notice, on how Scholar Rock process your personal data, or you would like to exercise one of the rights indicated above, you can also contact Scholar Rock's Data Protection Officer at privacy@scholarrock.com.

12. Changes to this EMEA HCPs Privacy Notice

We may update this EMEA HCPs Privacy Notice from time to time. Material changes will be communicated in advance via appropriate channels e.g. by post, email or via our internet websites. We encourage you to periodically review this EMEA HCPs Privacy Notice to learn how we use your personal data.