

Aclaris Therapeutics Website Privacy Notice

Contents

1	Introduction.....	2
2	Definitions	2
3	Data Protection Legislation	3
4	The Personal Data we collect about you	4
5	Cookies, Analytics and Tracking Technologies.....	5
6	How we collect your Personal Data	7
7	How we use your information	7
8	Who we might share your information with	10
9	How long we keep your information for	11
10	International transfers of your Personal Data	12
11	How we protect your Personal Data	13
12	How we keep you updated on our services	13
13	Giving your reviews and sharing your thoughts.....	13
14	Third Party websites and links	13
15	Children’s privacy	14
16	Your rights over your information.....	14
17	Contact Us.....	18
18	Changes to Our Privacy Notice	18

1 Introduction

Aclaris Therapeutics, Inc. (referred to as “Aclaris Therapeutics”, “the Company”, “we”, “our” or “us”) are committed to protecting the privacy and security of your Personal Data.

This Aclaris Therapeutics Privacy Notice applies to you if you are:

- A service user of this website (www.aclaristx.com);
- An employee, contractor, or consultant associated with and/or contracted by Aclaris Therapeutics;
- An employee, contractor, or consultant associated with and/or contracted by Aclaris Therapeutics’ Service Providers;
- A healthcare professional conducting an Aclaris Therapeutics clinical trial and/or engaged with Aclaris Therapeutics’ research activities;
- An Aclaris Therapeutics clinical trial participant; and/or
- Any other individual with whom Aclaris Therapeutics may conduct business.

We have developed this Privacy Notice to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your Personal Data. It is important that you read this notice so that you are aware of how and why we are using such information. Please note that although this Notice does refer to how we process your Personal Data in the context of you as a user of this Website, this Notice also applies to our processing of your Personal Data outside of the context of this Website, such as may be the case in the conduct of our clinical trials, research activities, or broader business dealings. If this Notice conflicts with information provided to you by activity specific transparency information (e.g., informed consent forms, or healthcare professional privacy notices), the content of the activity specific transparency information will be deemed to prevail.

If this Notice conflicts with local law, the provisions of local law will prevail.

2 Definitions

For the purposes of this Privacy Notice:

Company (referred to as either “Aclaris Therapeutics”, “the Company”, “we”, “us” or “our” in this Privacy Notice) refers to Aclaris Therapeutics, Inc., a Delaware corporation, having its principal place of business at 701 Lee Road, Suite 103, Wayne, PA, 19087 United States.

Cookies are small files that are placed on your computer, mobile device, or any other device by a website, containing the details of your browsing history on that website among its many uses.

Data Controller, for the purposes of both UK and EU GDPR, refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data. For the purpose of both UK and EU GDPR, the Company is the Data Controller.

Data Processor, for the purposes of both UK and EU GDPR, refers to the Company’s Service Providers and other business partners who process Personal Data at the direction of the Data Controller.

Data Protection Legislation, as defined in the [Data Protection Legislation](#) section below.

Device means any device that can access the Service such as a computer, a mobile phone, or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual as otherwise defined by the applicable Data Protection Legislation, including but not limited to UK GDPR and EU GDPR.

Service refers to any service offered by Aclaris Therapeutics, including but not limited to, for the purposes of this Privacy Notice: the functionality of the Website; the opportunity to work with Aclaris Therapeutics or Aclaris Therapeutics' Service Providers; and/or, any collaboration or participation relating to an Aclaris Therapeutics clinical trial.

Service Provider means any natural or legal person who processes data, including Personal Data, on behalf of the Company. It refers to third-party companies or individuals contracted or employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of both UK and EU GDPR, Service Providers are considered Data Processors.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to the Aclaris Therapeutics website, accessible from www.aclaristx.com and any other website that Aclaris Therapeutics may operate from time to time.

3 Data Protection Legislation

Throughout this document we refer to Data Protection Legislation.

3.1 EUROPEAN UNION (EU) AND EUROPEAN ECONOMIC AREA (EEA)

In the EU and EEA, Data Protection Legislation means the General Data Protection Regulation (Regulation (EU) 2016/679) ("EU GDPR"), the ePrivacy Directive (Directive 2002/58/EC), as well as any local data protection implementation laws, including any replacement legislation coming into effect from time to time.

3.2 UNITED KINGDOM (UK)

In the UK, Data Protection Legislation means the Data Protection Act 2018 ("DPA 2018"), the United Kingdom General Data Protection Regulation ("UK GDPR"), the Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR"), the Data (Use and Access) Act 2025, and any legislation implemented in connection with the aforementioned legislation, including any replacement legislation coming into effect from time to time.

3.3 UNITED STATES (US)

In the US, Data Protection Legislation refers to any federal, state, sectoral, or case laws and regulations governing the privacy and security of Personal Data. This includes applicable state privacy legislation, including, but not limited to, the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), the California Invasion of Privacy Act (CIPA), New York's Shield Act and Delaware's Online Privacy and Protection Act (DOPPA), as well as other relevant state and federal regulations. This definition also encompasses any legislation implemented under these laws and any replacement or additional legislation enacted from time to time.

3.4 DATA CONTROLLERSHIP

Where applicable under local Data Protection Legislation, Aclaris Therapeutics is the Data Controller ('controller') for the Personal Data we process, unless otherwise stated.

We have appointed a Data Protection Officer (DPO) to help us monitor internal compliance, inform, and advise on data protection obligations, and act as a point of contact for data subjects and supervisory authorities. For further details on how you can contact our DPO, please see the [Contact Us](#) section below.

4 The Personal Data we collect about you

We only collect Personal Data in accordance with the Data Protection Legislation and/or, where relevant, applicable legislation related to clinical trials, including, but not limited to:

1. the EU Clinical Trials Regulation (Regulation (EU) No 536/2014 of the European Parliament and of the Council of 16 April 2014 on clinical trials on medicinal products for human use, and repealing Directive 2001/20/EC (Text with EEA relevance), "EU CTR") in the EU; and,
2. applicable laws governing clinical trials in the US, including the Food and Drug Administration Amendments Act (FDAAA) (2007) and Title 21 of the Code of Federal Regulations (21 CFR).

Where you are a user of this Website, a clinical trial participant, or any other individual with whom Aclaris Therapeutics may conduct business, and unless otherwise stated, you are under no statutory or contractual requirement or obligation to provide us with your Personal Data. For instance, if you do not wish to participate in a clinical trial as a participant, you are under no obligation to provide the information outlined below to us. However, where you wish to engage with Aclaris Therapeutics' Services, we require at least the information outlined below for us to provide you with our relevant Services in an efficient and effective manner. Please note that, where you are either an employee, contractor, or consultant of Aclaris Therapeutics or Aclaris Therapeutics' Service Providers or a healthcare professional, and depending on the terms of any contract you may have signed with Aclaris Therapeutics or with your employer (where relevant), you may be statutorily or contractually obliged to provide Aclaris Therapeutics with some or all of the information outlined below.

The type of Personal Data that we will collect on you will depend on whether you are a user of the Website, an employee, contractor, or consultant of Aclaris Therapeutics or Aclaris Therapeutics' Service Providers, a healthcare professional, or a clinical trial participant:

Website User

- Where relevant, your name
- Where relevant, your contact information (email address)
- Where relevant, your Website Contact form responses
- Your Usage Data (e.g., your IP address and other pseudonymized unique identification number(s))

Employees, Contractors, or Consultants of Aclaris Therapeutics or Aclaris Therapeutics' Service Providers

- Your name
- Where relevant, your date of birth

- Your contact information (telephone number, email address, or mailing address)
- Your employment details
- Where relevant, your pseudonymized unique identification number(s) (e.g., payroll no.)
- Where relevant, your financial information (e.g., bank information)
- Where relevant, your taxpayer identification number (e.g. social security number)
- Where relevant, your Right to Work information (e.g., nationality)
- Where relevant, your health data (e.g., sick leave information)

Healthcare Professional (HCP)

- Your name
- Your contact information (telephone number, email address, or mailing address)
- Your professional qualifications
- Your employment details
- Where relevant, your financial information (payment details, and, where applicable, financial disclosure information about you, your spouse, and adult children's financial interests)
- Your research involvement, expertise, and advisory input

Clinical Trial Participant

- Your name*
- Your date of birth*
- Your age*
- Your gender*
- Your contact information (telephone number or email address)*
- Where applicable, the name of your legally authorized representative*
- Where applicable, the name and contact details of your partner*
- Your pseudonymized unique identification number(s)
- Your health data
- Your genetic data
- Your ethnicity

* This participant identifiable information is collected by the Company's clinical trial sites, acting on their behalf as Data Processors. This data may be shared with clinicians, health authorities, ethics bodies, and other personnel as authorized by Aclaris Therapeutics. However, this data will only be processed where Aclaris Therapeutics is legally obligated to process this data in accordance with Clinical Trial Regulations and other applicable laws. Aclaris Therapeutics will not directly receive participant identifiable information and will not instruct their Data Processors to process or share this information other than where the law requires. The collected and processing of Personal Data may be expanded or reduced from this list depending on each trial, as outlined in the informed consent form provided to the clinical trial participant.

5 Cookies, Analytics and Tracking Technologies

We use Cookies and similar technologies to monitor the activity on our Services, store certain information, and improve overall functionality and user experience.

You can choose to allow or deny categories of Cookies through our implementation of the Cookiebot Consent Management Platform. You can receive detailed information about each Cookie and category of Cookie or change or withdraw your consent for each Category of Cookie at any time by interacting with the Cookiebot widget.

You can also instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept certain Cookies, you may not be able to use some parts of our Services.

We use the following categories of Cookies for the purposes set out below:

Necessary Cookies

Type: Session Cookies

Administered by: Aclaris Therapeutics

Purpose: These Cookies are essential to provide you with Services available through the Website and to enable you to use some of its features. They help to authenticate users and detect and prevent fraudulent activity. Without these Cookies, we may not be able to provide you with certain Website Services.

Statistics and Marketing Cookies

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features, or functionality of the Website to see how our users react to them.

We and the third parties we work with use cookies and similar tracking technologies to collect information about your use of the Services, such as your IP address, browser type, browser version, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Services and other websites, provide customer support, troubleshoot issues with and improve the operation of our Website and Services, and better understand your online activity.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity. For more information on how Google collects and processes data click [here](#). To opt out of tracking by Google Analytics, click [here](#). For more information on the privacy practices of Google, please visit the [Google Privacy Terms web page](#).

6 How we collect your Personal Data

We collect your Personal Data when you:

- Participate in one or more of our clinical trials;
- Apply for a job in Aclaris Therapeutics or otherwise participate in our recruitment process;
- Interact with our staff;
- Conduct business or research with us;
- Use our Services, IT assets, websites, systems, networks and communication channels;
- Respond to surveys we provide; or
- Otherwise provide your Personal Data to us.

We may also receive information about you from other sources, such as recruitment agencies, healthcare providers, background check agencies and publicly available sources, when permitted by law.

7 How we use your information

Where EU GDPR and UK GDPR apply, we will only process your Personal Data where there is a valid lawful basis.. We will have provided you with our lawful basis for processing your Personal Data either within this Privacy Notice or at the point the information was initially collected from you when required by Data Protection Legislation. We will not store, process, or transfer your Personal Data unless we have an appropriate lawful reason to do so.

Where the lawful basis for processing is Consent, you are able to remove your consent at any time. You can do this by contacting our DPO using the contact details provided in the [Contact Us](#) section below.

We may use your information for the following purposes:

Processing Activity (Where EU GDPR and UK GDPR applies)	Lawful Basis
Where you are a clinical trial participant in an Aclaris Therapeutics clinical trial, to collect information from you and process your health information in order to conduct a clinical trial	Consent
Where you are a Health Care Professional (HCP) involved in the planning, delivery, or oversight of Aclaris Therapeutics clinical trials, to collect information from you and process your employment information in order to conduct a clinical trial	Legitimate Interest in conducting clinical research
Where you are an employee, consultant or contractor of Aclaris Therapeutics, to	Contractual Obligation

collect information from you and make available our Services to you	
Where you are a Service Provider or an employee of Aclaris Therapeutics' Service Providers, to collect information from you or your employer and make available our Services to your employer	Legitimate Interest in managing Aclaris Therapeutics' affairs
Where you are a Service Provider or an employee of Aclaris Therapeutics' Service Providers, to collect information from you and take payment from you, make a payment to you, give you a refund or request a refund	Contractual Obligation
Where you are a Service Provider or an employee of Aclaris Therapeutics' Service Providers, to collect information from you or your employer and liaise with your or your employer about your contact details and/or the nature and performance of your work, as required	Legitimate Interest in managing Aclaris Therapeutic' affairs
To collect information from you and monitor, provide and maintain our Website's Service	Legitimate Interest in providing Services to you
To collect statistics and marketing information from your use of the Website in order to analyse and improve our Website's Service	Consent
To contact you following your inquiry where you have provided your contact information and to reply to any questions, suggestions, issues, or complaints, including any Data Subject Requests, about which you have contacted us	Legitimate Interest in providing Services to you
To collect your Usage Data in order to power our security measures and services so you can safely access our Website and other Services	Legitimate Interest in providing a secure platform
To contact you, where you have provided your contact information, about news and information relating to our Services through service messages	Legitimate Interest in contacting you about our Services
Business-to-business ("B2B") direct marketing to you, where you have provided your contact information, about products and services from us where you are classified as a corporate subscriber	Legitimate Interest in marketing our Services to you

and/or the 'soft opt-in' applies under UK PECR	
B2B direct marketing to you, where you have provided your contact information, about products and services from us where you are a sole trader, partnership or otherwise classified as an individual subscriber and/or the 'soft opt-in' does not apply under UK PECR	Consent
To retain any accounting information generated during the course of our interaction for statutory accountancy retention periods	Legal Obligation
To respond to and defend against legal claims, where you have provided us with information which may give rise to legal claims	Legal Obligation

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7.1 CRIMINAL CONVICTIONS AND OFFENSES DATA

Where you are an employee, contractor, or consultant for Aclaris Therapeutics – or you are a candidate for such a role – and depending on the jurisdiction in which you operate and on the specific role in question, we may collect information about your criminal convictions and offenses. We do this to satisfy ourselves that there is nothing in your criminal convictions and offenses history which makes you unsuitable for the role. Our roles require a high degree of trust and integrity, and it is therefore best practice to undertake such checks and a pre-requisite in some instances.

We will only collect and use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations, or where we have an overriding legitimate interest to do so and provided we do so in line with our Data Protection Policy. We have in place appropriate policies and safeguards which we are required by law to maintain when processing such data.

7.2 AUTOMATED TECHNOLOGIES AND AI USE

As part of our ongoing efforts to improve the efficiency and quality of our research and clinical trial activities, we, and our Service Providers, may use artificial intelligence (AI) tools (“AI tools”) to support data analysis, communication, and system functionality. Some of these third-party software platforms, systems may process your Personal Data. Other AI tools which may be utilized by us may also include AI features and functionalities that may process your Personal Data.

Throughout our professional relationship with us, your Personal Data may be processed by these AI tools.

Our use of AI tools for processing your Personal Data is carried out on the basis of our Legitimate Interests to conduct clinical research and other business. We balance our interests against your data protection rights and apply appropriate safeguards to protect your Personal Data.

If you have any questions or concerns about this processing, please contact our DPO on the contact email address set out in the [Contact Us](#) section.

8 Who we might share your information with

We treat your Personal Data with strict confidentiality. However, we may share your Personal Data with other organizations in the following circumstances:

- Strategic clinical trial partners – where necessary to support the planning, delivery, or oversight of clinical trials.
- Legal and regulatory authorities – where required by law, regulation, court order, or in response to lawful requests from public authorities, or otherwise in support of Aclaris' clinical trial and other business needs.
- Legal rights and fraud prevention – to establish, exercise, or defend our legal rights, including sharing information the purposes of fraud detection and prevention.
- Current and future collaborators, licensees, acquirors, affiliates, and other business partners – where necessary for the conduct of our business interests.
- Service Providers – from time to time we may engage carefully selected third parties to perform business processes on our behalf.

We use Service Providers (“Data Processors”) who are third parties who provide elements of Services for us. Examples of these Data Processors include, but are not limited to:

- Our Contract Research Organizations (CROs) and EU representative;
- Our clinical trial Data Processors;
- Our research and business partners such as consultants and contractors;
- Our IT Service Providers such as Microsoft Corporation and other business vendors.

Before any Personal Data is processed in the context of our Data Processors, we implement Data Processor Agreements with our Data Processors. These agreements impose the following requirements on our Data Processors:

- They may only process your Personal Data on our documented instructions.
- They are prohibited from sharing your Personal Data with any organization other than Aclaris Therapeutics or authorized sub-processors who are bound by the same contractual safeguards.
- They must implement and maintain appropriate technical and organizational measures to protect your Personal Data.

- They may only retain your Personal Data for the period specified by Aclaris Therapeutics, after which it must be securely deleted or returned to us.

9 How long we keep your information for

Where EU GDPR and UK GDPR apply, we will keep your Personal Data for as long as reasonably necessary for the purposes described in this Privacy Notice, while we have a legitimate business need to do so, or as required by law (e.g. for tax, legal, accounting or other purposes). We will retain your Personal Data in accordance with the Data Protection Legislation and any other applicable laws and regulations and our data retention policies. Where the EU GDPR applies, Aclaris Therapeutics considers the retention period to begin from the point at which Aclaris Therapeutics last contacted you or otherwise reviewed your record to determine whether it was still active, unless otherwise required by law. As such, where the EU GDPR or UK GDPR applies, unless otherwise required by law, your data will be retained for the period specified in the summarized table below and then securely deleted in accordance with our internal policies and procedures.

Purpose	Retention Period
Processing data in relation to you as a clinical trial participant	25 years following the conclusion of the clinical trial, as determined by EU Clinical Trial Regulations (EU-CTRs)
Processing data in relation to you as a Health Care Professional (HCP) involved in the planning, delivery, or oversight of an Aclaris Therapeutics clinical trial	25 years following the conclusion of the clinical trial, as determined by EU Clinical Trial Regulations (EU-CTRs)
Processing data in relation to you as an employee, contractor or consultant contracted by Aclaris Therapeutics	6 years following the termination of your employment or contract
Processing data in relation to you as an employee, contractor or consultant contracted by Aclaris Therapeutics' Service Providers	6 years following the termination of the contract with the Service Provider with whom you are contracted or employed
Processing data in relation to you as a service user of this website	1 year
Processing data in relation to you as any other individual with whom Aclaris Therapeutics may conduct commercial operations	6 years

10 International transfers of your Personal Data

Your Personal Data is processed at Aclaris Therapeutics' operating offices and in any other places where the parties involved in the processing are located. This means that this information may be transferred to devices located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. In particular, when Aclaris Therapeutics shares clinical trials data with Data Processors, your Personal Data, which will be pseudonymized in any case, would be stored and processed within third countries. Where this occurs, Aclaris Therapeutics will seek to implement the following:

- the security and confidentiality of your Personal Data is secure at all times;
- any Data Controller receiving your Personal Data has entered into an agreement with Aclaris Therapeutics which contains standard data protection clauses as required by UK and/or EU GDPR, or other applicable legislation, or there is an alternative appropriate safeguard in place governing the transfer; and,
- any Data Processor receiving your Personal Data has entered into an agreement with Aclaris Therapeutics which contains the required Data Processor clauses as well as standard data protection clauses as required by UK and/or EU GDPR, or other applicable legislation, or there is an alternative appropriate safeguard in place governing the transfer.

Where you are based in the UK or EU and we were required to transfer your Personal Data out of the UK or EU to countries not deemed by the ICO or European Commission (as relevant) to provide an adequate level of Personal Data protection, the transfer may in some cases be based on safeguards that allow us to conduct the transfer in accordance with the Data Protection Legislation, such as the specific contracts containing standard data protection clauses approved by the ICO or European Commission (as relevant) providing adequate protection of Personal Data. You can obtain a copy of this documentation by contacting the EU Representative or DPO identified in the [Contact Us](#) section below. In other cases, we may request your explicit consent for this international transfer.

11 How we protect your Personal Data

Data security is of great importance to Aclaris Therapeutics. We have put in place appropriate technical and organizational measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed.

We take security measures to protect your information including:

- Limiting access to our buildings and resources to only those that we have determined are entitled to be there (by use of passes, key card access and other related technologies);
- Managing a data security breach reporting and notification system which allows us to monitor and communicate information on data breaches with you or with the applicable regulator when required to do so by law;
- Implementing access controls to our information technology; and,
- Deploying appropriate procedures and technical security measures (including, where appropriate to do so, encryption, anonymization and archiving techniques) to safeguard

your information across all our computer systems, networks, websites, mobile apps, and offices.

12 How we keep you updated on our services

Where you are a clinical trial participant or a Health Care Professional involved in the planning, delivery, or oversight of a Aclaris Therapeutics clinical trial, we will contact you directly or through our Contract Research Organization (CRO) where it is necessary to do so.

Where you are an employee, contractor or consultant of Aclaris Therapeutics, we will contact you through existing Aclaris Therapeutics communication channels, including email, where it is appropriate to do so.

Where you are an employee, contractor or consultant of Aclaris Therapeutics' Service Providers, a user of the Website who has provided us with your contact information, or any other business contact, we will send you relevant news about our Services in a number of ways including by email, but only if we have a Legitimate Interest to do so. Where we do not have a Legitimate Interest, we will not send you marketing communications unless we have asked for, and gained, your consent.

We make every effort to only send such communications to those acting in a business capacity and do not send such materials to consumers via personal email addresses if it is clear they are not acting in such a capacity or have not otherwise provided their consent.

All marketing email communications will have an option to unsubscribe and so if you wish to amend your marketing preferences, you can do so by following the link in the email and updating your preferences. Alternatively, you can contact our DPO using the contact details provided in the [Contact Us](#) section below.

13 Giving your reviews and sharing your thoughts

When using our Website and other Services, you may be able to share information through social networks like LinkedIn. For example, when you 'like', 'share' or review our Services. When doing this, your Personal Data may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so that you are comfortable with how your information is used and shared on them.

14 Third Party websites and links

Our website may contain links to other sites operated by third parties. The Company does not control such other sites and is not responsible for their content, their privacy policies, or their use of personal information. The Company's inclusion of such links does not imply any endorsement of the content on such sites or of their owners or operators except as disclosed through the

Services. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal information by third parties.

15 Children's privacy

Notwithstanding any Personal Data of children of clinical trial participants where we are obligated to collect this information under applicable law, we do not seek or knowingly collect any personal information about children under 16 years of age. If we become aware that we have unknowingly collected personal information from a child under the age of 16, we will make commercially reasonable efforts to delete such information from our database.

If you are the parent or guardian of a minor child who has provided us with personal information, you may [Contact Us](#) using the contact information below to request it be deleted.

16 Your rights over your information

16.1 EUROPEAN UNION (EU), EUROPEAN ECONOMIC AREA (EEA), AND UNITED KINGDOM (UK)

Where EU GDPR and UK GDPR apply, you have certain rights over your Personal Data. For your protection, and to protect the privacy of others, we may need to verify your identity before completing what you have asked us to do. If you would like to exercise these rights, or if you would like more information about your rights or have any concerns about how we process your Personal Data, please [Contact Us](#) as set out below.

16.1.1 The right to be informed;

You have the right to be informed about the collection and use of your Personal Data. We do this with our internal and external Privacy Notices (including this document). These are regularly reviewed and updated to accurately reflect our data processing activities.

16.1.2 Right to Access Your Personal Data

You have the right to access the Personal Data that we hold about you in many circumstances, by making a request. This is sometimes termed 'Data Subject Access Request'. If we agree that we are obliged to provide Personal Data to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 1 month from when your identity has been confirmed. If your request is particularly complex, we may extend this response window to a total of 3 months.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your Personal Data.

16.1.3 Right to Rectify Your Personal Data

If any of the Personal Data we hold about you is inaccurate, incomplete, or out of date, you may ask us to correct it. If we shared your Personal Data with others, we will tell them about the correction where possible.

16.1.4 Right to Erasure

You have the right to have Personal Data erased. This is also known as the ‘right to be forgotten’. The right is not absolute and only applies in certain circumstances. For instance, the right to erasure does not apply where we have a legal obligation to retain your Personal Data.

If we shared your data with others, we will alert them to the need for erasure where possible.

16.1.5 Right to Restrict Processing

You have the right to ask us to restrict the processing of your Personal Data. For example, this may be because you have issues with the accuracy of the data we hold or the way we have processed your data. The right is not absolute and only applies in certain circumstances. We will tell you before we lift any restriction on processing. If we shared your Personal Data with others, we will tell them about the restriction where possible.

16.1.6 Right to Portability

The right to portability gives you the right to receive Personal Data you have provided to a controller in a structured, commonly used, and machine-readable format, where the lawful basis for processing relies upon consent or a contract entered into with you. It also gives you the right to request that a controller transmits this Personal Data directly to another controller.

16.1.7 Right to Object

You have the right to object to our processing of some or all of the Personal Data that we hold about you. This is an absolute right when we use your data for direct marketing but may not apply in other circumstances where we have a compelling reason to do so, e.g., a legal obligation.

16.1.8 Rights Related to Automated Decision-Making

You have the right to object to our processing where a decision is made about you solely based upon automated processed and which has significant or legal effects. Aclaris Therapeutics does not intend to conduct any automated decision-making for your Personal Data.

16.1.9 Right to withdraw consent

If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time, but this will not affect any processing of your data that has already taken place.

16.1.10 Right to lodge a complaint with the data protection authority

If you have a concern about our privacy practices, including the way we handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

16.1.11 For more information about your privacy rights

If you are in the UK, you have the right to lodge a complaint directly with us at any time, or you may lodge a complaint with the Information Commissioner’s Office (ICO) <https://ico.org.uk/>, the UK supervisory authority for data protection.

If you are in the EU or EEA, you also have the right to lodge a complaint at any time with the relevant supervisory authority responsible for data protection. For a list of the relevant supervisory authorities, please see https://www.edpb.europa.eu/about-edpb/about-edpb/members_en

Depending on your jurisdiction, it is possible that a different regulator or supervisory authority may govern the processing of Personal Data. If you have any questions about which supervisory authority applies in your jurisdiction, please [Contact Us](#) as set out below. You can make a complaint to the relevant regulatory body at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first.

Your satisfaction is extremely important to us, and we will always seek to do our very best to solve any problems you may have.

16.2 UNITED STATES - CALIFORNIA

16.2.1 California Data Protection Legislation

If you are a California resident, the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”), if applicable to us, requires that we provide you with a privacy policy of our online and offline information practices and your rights under this law regarding your personal information.

We currently collect, share, disclose, and use your personal information. In the 12 months prior to the last updated date of this Privacy Notice, we have collected, shared, disclosed the personal information set out in in this Privacy Notice. We may collect personal information directly from California and other US state residents, credit reporting agencies, and/or our third-party service providers. We do not collect all categories of personal information from each source.

16.2.2 California Resident Rights

California residents are afforded the following rights under the CCPA, where applicable:

- to delete your personal information, unless we:
 - can prove this to be impossible;
 - it involves disproportionate effort; or
 - it is reasonably necessary for us to maintain records in order to fulfil the transaction(s) for which the personal information was collected;
- to correct inaccurate personal information held about you;
- to know what personal information is sold or shared and to whom (*this right is fulfilled with the information provided within this Privacy Notice*);
- to request specific pieces of information from us;
- to opt out of the sale or sharing of your personal information;
- to limit use and disclosure of sensitive Personal Data; and,
- to no retaliation following opt-out or exercise of other rights.

If you would like to contact us regarding these rights, please [Contact Us](#) as set out below. Please note that we may need to verify your identity before processing your request. Rights requests shall be reviewed to see if an exemption allows us to retain the information. We may deny your deletion request if an exemption applies and/or if retaining the information is necessary for us or our Service Provider(s), for example to detect fraudulent activity or comply with a legal obligation. We will delete, de-identify or limit the scope of personal information not subject to an exemption from our records and will direct our Service Providers to take similar action.

16.2.3 California Cookie Legislation

16.3 THE CALIFORNIA INVASION OF PRIVACY ACT (“CIPA”) REQUIRES US TO COLLECT CONSENT FROM WEBSITE USERS IN CALIFORNIA FOR THE PURPOSES OF DEPLOYING COOKIES ON USER DEVICES, EXCEPT WHERE THOSE COOKIES ARE FOR THE PURPOSES OF “CONSTRUCTION, MAINTENANCE, CONDUCT OR OPERATION OF THE SERVICES”. NON-ESSENTIAL COOKIES ARE ONLY PLACED ON THE DEVICES OF WEBSITE USERS WITH THE EXPLICIT, OPT-IN CONSENT OF THAT USER. WEBSITE USERS ARE REQUESTED TO PROVIDE OR WITHHOLD THEIR CONSENT FOR NON-ESSENTIAL COOKIES VIA THE WEBSITE COOKIEBOT BANNER UPON FIRST VISITING THE WEBSITE, AND USERS CAN CHANGE OR

WITHDRAW THEIR CONSENT AT ANY TIME BY INTERACTING WITH THE COOKIEBOT WIDGET. UNITED STATES – OTHER DATA PROTECTION LEGISLATION

16.3.1 Other US Data Protection Legislation

If you are a US resident, we process your Personal Data in accordance with applicable US state data privacy laws, including when applicable the CCPA/CPRA described above. This section of our Privacy Notice contains information required by other US state data privacy laws and supplements the above section on CCPA/CPRA.

Several US states have enacted comprehensive privacy statutes, including but not limited to Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia. These laws include provisions aimed at safeguarding consumer rights and outlining business obligations. If you have relevant rights under these laws, you can exercise them by contacting us using the details provided in the [Contact Us](#) section as set out below.

Our practices are designed to adhere to the standards set forth by applicable laws in order to respect the privacy rights of all individuals. As the US privacy laws continue to evolve, we will monitor these changes, adjust our privacy practices, and update our Privacy Notice(s), accordingly.

16.3.2 We Do Not Sell Your Personal Information

If you are a US resident, you have the right to know whether your personal information is being sold. Your personal information is “sold” when it is provided to a third party for monetary or other valuable consideration for a purpose that is not a “business purpose” as set forth in the CCPA or other US state data privacy laws.

Please note a “sale” does not include when we disclose your personal information at your direction, or when otherwise permitted under law.

16.3.3 We May Share Your Personal Information

If you are a US resident, please note that we may “share” your Personal Data, as defined under California and other applicable US state laws, for personalised advertising purposes and/or for any other purposes outlined in this Privacy Notice.

16.3.4 Do Not Track

If you are a US resident, please note that, due to varying practices among browser providers and the lack of a market standard, we do not respond to Do Not Track signals at this time.

16.3.5 Non-Discrimination

If you are a US resident, please note that US state privacy laws prohibit businesses from discriminating against you for exercising your rights under the law. Such discrimination may include denying goods or services, providing a different level or quality of service, or charging different prices.

The CCPA permits businesses to provide differing levels or quality or different prices where the business can demonstrate that the difference is reasonably related to the value to the business of the consumer’s personal information.

16.3.6 Other Data Protection Legislation

Where you are located in a jurisdiction outside of the EU, EEA, UK, and US, you may have data protection rights under the Data Protection Legislation applicable in your jurisdiction, such as the right to access, rectify, or erase your Personal Data. If you have relevant rights under these laws, you can exercise them by contacting us using the details provided in the [Contact Us](#) section as set out below.

17 Contact Us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this Privacy Notice or the way your Personal Data is processed, please contact our Data Protection Officer or our EU GDPR Representative using the details set out below.

Our Data Protection Officer (DPO):

The DPO Centre Netherlands B.V., dpo@aclaristx.com

Our EU GDPR Representative:

The DPO Centre Europe Limited, eurep@aclaristx.com

18 Changes to Our Privacy Notice

Thank you for taking the time to read our Privacy Notice.

We may change this Privacy Notice from time to time (for example, if the law changes). We recommend that you check this Privacy Notice regularly to keep up-to-date.

This Privacy Notice was last updated on March 18, 2026.