

Data Processing Addendum

Between Gamma Insights, Ltd. and Delta Pharma Corp.

Effective Date: March 15, 2024

Controller: Delta Pharma Corp., a Delaware corporation

Processor: Gamma Insights, Ltd., a United Kingdom private limited company

This Data Processing Addendum (the “DPA”) is entered into as of March 15, 2024 (the “Effective Date”) by and between Gamma Insights, Ltd. (“Processor”) and Delta Pharma Corp. (“Controller”). Processor will provide data analytics and machine learning based reporting services relating to Controller’s clinical and manufacturing data, subject to the terms below.

Section 1: Parties, Officers, and Contacts

1.1 Key Compliance Contacts

For purposes of this DPA, the following individuals are designated as key contacts for privacy, security, and operational oversight:

- **DPO Alice Smith**, Data Protection Officer of Gamma Insights, Ltd.
- **CIO David Lee**, Chief Information Officer of Gamma Insights, Ltd.
- **Counsel Priya Patel**, Senior Legal Counsel, Gamma Insights, Ltd.

The parties agree that these officers are authorized to receive notices and to coordinate responses to data subject requests and supervisory authority inquiries.

1.2 Notices

All formal notices under this DPA must be sent in writing, referencing this DPA, and addressed to the officers listed in Section 1.1, unless either party updates such information in writing.

Section 2: Term and Renewal

2.1 Initial Term

The initial term of this DPA (the “Initial Term”) begins on March 15, 2024 and continues for **thirty six (36) months**.

2.2 Renewal Term

Following the Initial Term, this DPA will automatically renew for successive **twelve (12) month** periods (each, a “Renewal Term”) unless either party provides at least **ninety (90) days** prior written notice of non renewal before the end of the then current term.

2.3 Early Termination

Either party may terminate this DPA for material breach upon **thirty (30) days** written notice, provided such breach is not cured within the notice period.

Section 3: Data Processing and Security

3.1 Scope of Processing

Processor will ingest Controller data sets, including pseudonymized patient records and manufacturing batch data, and will provide analytics, dashboards, and anomaly detection related to quality and compliance.

3.2 Data Protection Officers and Contacts

The Processor officers overseeing implementation of the data protection program for Controller are:

- **DPO Alice Smith**, Data Protection Officer of Gamma Insights, Ltd.
- **CIO David Lee**, Chief Information Officer of Gamma Insights, Ltd.

These officers are intended to align with the key contacts identified in Section 1.1 of this DPA. From time to time, other individuals may support legal or security workstreams.

3.3 Security Measures

Processor will implement and maintain technical and organizational measures designed to protect Controller data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. Such measures include network segmentation, role based access controls, encryption at rest and in transit, and regular third party penetration testing.

Section 4: Fees and Service Levels

4.1 Annual Fee

Controller will pay an annual platform and services fee of **USD \$120,000** for the data processing services under this DPA.

4.2 Invoicing and Payment

Processor will invoice Controller annually in advance. Controller must pay each undisputed invoice within **thirty (30) days** of the invoice date.

4.3 Service Level Credits

If monthly service uptime falls below **99.5%**, Controller will be entitled to a service credit equal to **ten percent (10%)** of the applicable monthly portion of the annual fee for the affected month.

4.4 Suspension for Non Payment

If any undisputed amounts remain unpaid for more than **sixty (60) days** after the due date, Processor may suspend access to the services upon ten (10) days written notice, without terminating this DPA.

Section 5: Signatures

The parties have executed this DPA as of **03/16/2024**.

Gamma Insights, Ltd.

By: _____
DPO Alice Smith

Title: _____
Data Protection Officer

Delta Pharma Corp.

By: _____
CFO Jonathan Reed

Title: _____
Chief Financial Officer