

Veritas Genetics Privacy Notice

1. Overview

Veritas Genetics, Inc. and affiliates, ("Veritas," "we" or "us") is committed to protecting the privacy and security of all Personal Data we collect and process. Veritas has established this Privacy Notice to inform you of the specific practices and guidelines that help ensure the security and confidentiality of your Personal Data. By communicating with us, or using or accessing in any way our Products and Services - including the websites we control and operate (www.veritasgenetics.com, our "Website(s)"), and our online requisition portal www.veritasgenetics.com/user/login (our "Account Portal") - you agree to the terms of this Privacy Notice. If you do not agree with the terms of this Privacy Notice, please do not access or use the Websites or our Products and Services. Veritas is committed to upholding the confidentiality of Personal Data and strives to collect, use and disclose Personal Data in a manner consistent with all applicable laws and regulations. This includes compliance with the Health Insurance Portability and Accountability Act of 1996, as amended ("HIPAA") to the extent it applies to products and services provided by Veritas. Please see our [HIPAA Notice of Privacy Practices](#) for further information. For any further questions on Veritas' privacy and security practices, please contact us at Privacy@VeritasGenetics.com.

2. Definitions

Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Protection Authority: An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.

Genetic Data: Personal Data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.

Personal Data: Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing: Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

Sensitive Personal Data: Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

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3. How do we Collect Personal Data?

Veritas collects Personal Data about you from a variety of sources:

- Veritas obtains your Personal Data when you provide it to us (e.g. where you contact us via email, your account, telephone or by other means)
- Veritas may request your Personal Data when such collection is necessary to fulfill the services you have selected;
- Veritas may receive relevant Personal Data from third parties who provide it to us for a specific purpose and only where a legal basis exists (e.g. your doctor, law enforcement agencies)
- Veritas may receive Personal Data from third parties when you purchase any of our products or services through such third parties (for example, shipping address and other relevant delivery information);
- Veritas collects or obtains Personal Data when you visit our Websites or use any features or resources available on or through our Websites. When you visit our Websites, your device and browsers may automatically disclose certain information, such as device type, operating system, browser type, browser settings, IP address, language settings, time and date of connection, and other technical information, some of which may constitute Personal Data.
- Additionally, Veritas creates Personal Data about you, such as records of your interactions with us, and details about your account, subject to applicable law.

4. What types of Information does Veritas Collect and Process?

Veritas takes reasonable steps to ensure that Personal Data Processed by Veritas is limited to the Personal Data reasonably required in connection with the purposes set out in this Policy. This is commonly referred to as the “Minimum Necessary” concept and helps us comply with applicable data privacy laws. The categories of Personal and Sensitive Personal Data about you that Veritas Processes, subject to applicable law, are as follows:

- Genetic Data and health-related Personal Data as submitted to us for testing in relation to Veritas Products. This may include physical samples provided in connection with your use of our Products (such as a blood sample, saliva sample, or nasal swab which is needed to use some of our products and services). We may also request or generate genetic data, medical history, family history, known familial genetic conditions or mutations where necessary to provide our products and services;
- Purchase and Registration Information and General Personal Details (such as name, gender, date of birth, age, billing address, delivery address, payment information such as payment method details);
- Authentication data (such as passwords or security questions & answers);
- Contact details (such as address, telephone number, email address, social media profiles if contacting us over social media);
- Referral and Third Party Recipient Information (such as details on people or entities you’d like your data shared with or who share data with us, for example a Doctor or Family Member);
- Views, Feedback and opinions any views or opinion that you choose to send to us (such as feedback on products and services);
- Website and Device Personal Data (such as IP addresses, cookies, activity logs, online identifiers, unique device identifies, geolocation data). See the Cookies section below for more information.

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5. Purposes and Legal Basis for Data Processing

The purposes for which Veritas may Process Personal Data, subject to applicable law, and the legal basis on which Veritas may perform such Processing, are:

• **Genetic Sequencing and Health Testing:** Performing genetic sequencing and testing services for customers, processing and delivering results. Veritas has obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary). The processing is necessary to provide the requested service and in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us.

• **Customer Contact, Communication, and Account Administration:** To respond to customer inquiries, provide information about our website, communicate with you about transactions, products and services, provide technical support, and administer your account. The processing is necessary to provide the requested products or services, or is in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us.

• **Legal and Regulatory Compliance, Audits, Certifications, and Proceedings:** Compliance with legal and regulatory obligations, screening against sanction lists, and audits or certifications/accreditations. Establishing, exercising, and defending legal rights. Veritas has a legitimate interest in carrying out the Processing for the purposes of establishing, exercising, or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).

• **Security, Investigations, and IT Operations:** Physical security of our premises (including records of visits to our premises and Security recording) and electronic security (including login records, device details, access details). Management of our communications systems, operation of IT security, Security audits, and other investigations. The legal basis for this activity is that Veritas has a legitimate interest in carrying out the Processing for the purposes of establishing, exercising, or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).

• **Improving Products & Services, and Marketing:** Communications about our products and services via email, phone, or other means, subject to ensuring that such communications are provided to you in compliance with applicable law. Identifying issues and planning improvements for existing products and services, and creating new products and services. The legal basis for this activity is that Veritas has a legitimate interest in carrying out the Processing for the purposes of establishing, exercising, or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms), or Veritas has obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary). Please note that if you do not wish to receive marketing emails from us, you can opt out at any time by contacting Privacy@VeritasGenetics.com

• **Operation of Website:** Operation, management, and improvement of our Website, communicating and interacting with you via Our Website. The Processing may be necessary in connection with delivering our products and services under any contract that you may enter into with us, or that Veritas has a legitimate interest in carrying out the Processing for the purposes of establishing, exercising, or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms). Veritas may also have obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary) for certain website activities, such as certain types of cookies.

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• **Research and Product Development:** If you are a healthcare provider or patient ordering our Services, we may use your personal information for research purposes where we have a legal basis to do so, or may contact you about research opportunities, clinical trials, or clinical treatments for you or your patients when appropriate. The legal basis for this activity is that Veritas has obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary), or if consent is not required as a legal basis for such activities, Veritas is acting in its legitimate business interests where not overridden by your interests or fundamental rights and freedoms.

6. Your Privacy Rights

Subject to applicable law, you have a number of rights regarding the Processing of your Personal Data. You may exercise your privacy rights by contacting us at:

Postal Address: Veritas Genetics, Inc. 99 Conifer Hill Drive Danvers, Massachusetts 01923, USA

Telephone: 1-888-507-6619

Email: Privacy@VeritasGenetics.com

Your privacy rights may include, without limitation:

- The right to request access to, or copies of, your Personal Data that Veritas Processes or controls; together with information regarding the nature, processing and disclosure of those Personal Data;
- The right to request rectification of any inaccuracies in your Personal Data that Veritas Processes or controls;
- The right to request erasure of your Personal Data or restriction of Processing of your Personal Data that Veritas controls or Processes. Please note that we may have a legal basis or be legally obligated to maintain certain of your Personal Data in the event of a deletion request (such as retaining for regulatory compliance purposes) and may not be legally obligated to delete all of your personal data on request where it is subject to such retention requirements;
- The right to have your Personal Data that Veritas controls or Processes transferred to another Controller, to the extent applicable;
- Where Veritas processes your Personal Data on the basis of your consent, the right to withdraw that consent;
- The right to request information about whether Veritas has disclosed Personal Data to any third parties for the third parties' direct marketing purposes;
- The right to request a listing of the types of Personal Data we have collected about you, the sources of that information, how we use the information (e.g., our business or commercial purposes for collecting it or sharing it), other individuals and business with whom we share Personal Data, and the specific pieces of Personal Data that we have collected about you;
- The right not to receive discriminatory treatment by us (including denying goods or services, charging different prices or rates for goods and services, imposing penalties, providing a different level or quality of goods or services, or suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services) for exercising any of your privacy rights;

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- The right to lodge a complaint with a Data Protection Authority regarding the Processing of Personal Data by Veritas or on Veritas' behalf;
- The right to object to the Processing of your Personal Data by Veritas;
- The Right to object to the Processing of your Personal Data by Veritas, or to Processing on our behalf, for direct marketing purposes.

7. California Residents

We do not engage in the Sale of Personal Data, including as defined by the California Consumer Privacy Act or "CCPA"). You may exercise your privacy rights under the CCPA by contacting us as described in the "Your Privacy Rights" section above, which details your rights under CCPA. We may have collected the categories of personal information about you described in the "What types of Information does Veritas Collect and Process?" section of this notice, including in the last twelve months. We may have shared your personal information as described in the "Third Parties: Who we may provide your Personal Data to and Why" section of this notice, including within the last twelve months.

8. Data Retention: How long we hold Your Data.

Veritas takes reasonable steps to ensure that your Personal Data is Processed for the minimum period necessary for the purposes set out in this Policy and as required by law or by regulatory compliance requirements, such as those set out by our accrediting agency. The criteria for determining the duration for which Veritas retains your Personal Data is as follows:

i. Veritas will retain copies of your Personal Data in a form that permits identification only for as long as:

A. Veritas maintains an ongoing relationship with you; or

B. Your Personal Data is necessary in connection with the lawful purposes set out in this Policy (see "Purposes and Legal Basis for Data Processing" section above), for which Veritas has a valid legal basis.

ii. Additionally, Veritas will retain copies for the duration of any applicable limitation period under applicable law (i.e. any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant);

iii. In addition, if any relevant legal claims are brought, Veritas may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim. During the periods noted in paragraph **ii** (A) and **ii**, Veritas will restrict our Processing of your Personal Data to storage of, and maintaining the security of, that data, except to the extent that the data need to be reviewed in connection with any legal claim or obligation.

Once the applicable period has ended, Veritas will either:

- Permanently Destroy or delete the relevant Personal Data;
- Archive your Personal Data so that it is beyond further use or disclosure; or
- Anonymize the Relevant Personal Data.

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9. Data Security: How we keep your Data safe.

Veritas has implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful loss, alteration, disclosure, access, destruction, and unlawful or unauthorized forms of use or disclosure. These security measures are aligned to industry standards and key regulatory requirements that may apply to us, such as HIPAA, HITRUST, and NIST. Information that you provide to Veritas through its Websites is encrypted using industry standard Secure Sockets Layer (SSL) technology, with the exception of information you send via email, which will depend on your email provider or your use of encryption tools. Your information is processed and stored on controlled servers with restricted access. Unfortunately, we cannot ensure or warrant the security of any information you transmit to our Websites, and you do so at your own risk. As a consequence, Veritas disclaims any warranties or representations relating to maintenance or nondisclosure of private information. We may, from time to time, provide links on our Website to the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy statements and that we do not accept any responsibility or liability for their privacy or security practices. Please check these privacy statements before you submit any personal information to these websites.

10. Data Accuracy: How we make sure your Data is accurate.

Veritas takes reasonable steps to ensure that Personal Data that is Processed by Veritas is accurate, and, if necessary, up to date, and to ensure that any of your Personal Data processed by Veritas that is inaccurate (having regard to the purposes for which it is Processed) is erased or rectified. Veritas may ask you to confirm the accuracy of your Personal Data.

11. Third Parties: Who we may provide your Personal Data to, and why.

We share Personal Data with service providers, healthcare providers, affiliates, partners, and other third parties where it is necessary to provide our services, legally required, or for any other purposes described in this Privacy Statement. Veritas may disclose your Personal Data to the following categories of recipients:

- You, and, where appropriate (such as with your consent or another legal basis, such as to protect your vital interests), your family or authorized legal representative;
- Your Physician, other healthcare providers or pharmacies (where appropriate, such as with your consent, or where required to deliver our services) such as the health system or clinic where your own provider practices, and other providers that you or your healthcare provider designated to receive your information;
- Third party service providers (such as payment services providers, shipping companies, IT service providers, marketing and communications service providers, analytics providers, legal advisors, and contractors) to support us in providing our services. Our Websites may use third party plugins or content. If you choose to interact with any such plug-in or content, your Personal Data may be shared with the third party provider of the relevant social media platform. Veritas recommends that you review that third party's privacy policy before interacting with its plugins or content. If Veritas engages a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to only Process the Personal Data in accordance with our prior written instruction, and to use measures to protect the confidentiality and security of the Personal Data, along with any additional requirements under applicable law;

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- Information Veritas shares with commonly owned entities;
- Any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation);
- Disclosures required by law or for regulatory compliance such as to public health authorities (as required in the case of certain test results for communicable diseases like COVID-19);
- Any relevant party for the purposes of prevention, investigation, detection or prosecution of illegal activity that may expose us to legal liability or costs, or to enforce our policies regarding privacy and security, governing our Websites, or governing the use of our products and services;
- For research, development, publications, and analytics (please also review the consent forms provided for any applicable products or services you are using for more details). You may be able to opt-out of such research (see “Your Privacy Rights” section for how to do this, or information on any consent forms that you are provided). Please note that Veritas cannot retroactively remove your Personal Data or de-identified information from research that has already been performed based on your Personal Data or de-identified information that was provided under a consent previously given. Types of third party research data sharing may include:
 - a) Veritas may engage in collaborative research with third parties (for example, health, educational, or government institutions, or private companies) related to the development of new tests, validation of existing testing processes or technologies, or to improve existing products and services.
 - b) Veritas may disclose de-identified genetic information to public databases for the advancement of medical research. This enables improved understanding of how genetics may impact the risk of certain diseases or health conditions. With your consent, we may include de-identified genetic information in our research databases, which are accessible, searchable, and downloadable by third parties (including researchers and the public). More information about this will be available on any consent forms provided to you.
 - c) Veritas and/or its workforce members may be involved in the creation of publications, and this may include collaborating with third parties. Where this is done, it will involve only de-identified information.
- If any third party has provided, subsidized or paid for the Veritas products and services you are using, your Personal Data may be shared with them as required by the contract between Veritas and that third party. This may include identifiable results reporting (for example, reporting COVID-19 testing results to your employer, if they are performing a testing program for health and safety in the workplace). If you are a participant in such a program, you will be provided with a program specific privacy notice and/or consent form as required.

12. Cookies: How our website collects information.

What are Cookies?

A cookie is a small piece of data that a website – when visited by a user – asks your browser to store on your device to remember preferences and other information, for example previous website or page visits from that device and browser, username or login prompts, or other online behaviors. We use industry standard cookies and other tracking technologies to track your behavior online, assist you in navigation and using intended website functionality (e.g., retaining items in a shopping cart), analytics purposes to gather – and enable your ability to provide – feedback to improve our products and services, or may use cookies to provide marketing, for example if you visit other websites within our network of marketing service providers.

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Cookies placed on your browser may be for the duration of your online session on our website, or for a longer defined time period, including persisting on your browser indefinitely or until cleared. To remove cookies, please see the “How to opt in or out of cookies” section below. Additionally, more information about Cookies and details of how to manage or disable them can be found on <http://www.aboutcookies.org>. Cookies set by us on our Website are called “first-party” cookies, used to help evaluate and enable performance and functionality of our products and services, including our Website. We may also use “third-party” cookies, which are cookies from a website domain other than our Websites. These are used for our website analytics, site functionality, and may be used for marketing efforts (in which case, we provide an opportunity to opt out of such cookies where required by law) by sharing usage and device-related data with relevant third parties. Certain pages of our Websites or email correspondence may use session cookies, persistent cookies, or web beacons to anonymously track unique visitors, save website preferences, and allow us to recognize visits from the same computer and browser. You have the option to reject our Website’s cookies and still use our Websites; however, your access may be limited.

How do I opt in or out of cookies?

The first time you visit our Website and depending on your jurisdiction, you may be displayed a cookie banner providing you with information about the use of cookies on our Website, and options for how to opt in or opt out of certain cookies when you visit. You may also opt out of third-party use of cookies and device identifiers in some instances with the relevant third-party directly (see links to our thirdparty marketing service provider websites below). Alternatively, you may be able to opt out of a thirdparty service provider's use of cookies by visiting the Network Advertising Initiative opt-out page or control the use of device identifiers by using your specific device and/or web browser’s settings to block or clear certain cookies, however note that if you block certain cookies some parts of our Website may not work correctly. You can change your web browser settings so your computer warns you each time a Cookie is sent, or to turn off all Cookies. Each browser is a little different, so please look at your browser "help menu" to learn the correct way to modify your Cookies. However, if you disable Cookies you won't have access to many features that may make your browsing of our Site and use of our services smoother, and some of our services may not function properly or at all. For example, if you disable Cookies you may not be able to log into your user account as easily.

What types of cookies are on our Website and why?

We use the following types of cookies for the following purposes:

Strictly Necessary Cookies:

These cookies are essential for you to browse our Website and use its intended functionality, including accessing secure areas of the Website, moving items to the shopping cart before making a purchase, helping to ensure security, and to log interactions with our cookie banner. These cookies cannot be opted in or out of.

Performance Cookies:

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Website. They help us to know which pages are the most and least popular and see how visitors move around the Website. If you do not allow these cookies, we will not know when you have visited our site and will not be able to monitor its performance using data provided by your visit.

Functional Cookies: These cookies enable the website to provide enhanced functionality. They may be set by us or by third-party service providers whose services we have added to our pages (for example, adding Customer Service Chat support to our site, or allowing you to provide feedback on products and services). If you disable these cookies, the website may lose certain non-essential aspects of its functionality.

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Targeting Cookies:

These cookies may be set on our Website by our advertising and marketing service providers. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They are based on uniquely identifying your browser and internet device. This recognition is used to serve relevant adverts, links, or other information about our products and services to users visiting other websites after having previously visited our Website or interacted with our products and services. If you consent to these cookies, you may experience targeted advertising.

Google Analytic

We may use Google Analytics to better understand your use of our Website and Services. Google Analytics collects information such as how often users visit our Website, what pages are visited, and what other sites may have been used prior to visiting. Google uses the data collected to track and examine websites usage, to prepare reports on its activities and share them with other Google services, and to contextualize and personalize the ads of its own advertising network. More information about how Google Analytics collects and processes data can be found [here](#). Google's ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can also opt out of and manage your preferences for Google's use of personalized advertising and related cookies by visiting Google's Ad Settings, and Google Analytics also offers an opt-out mechanism for the web.

If you have any questions regarding our use of Cookies please contact us at the below email address:
Privacy@VeritasGenetics.com.

13. Children's privacy

We will not knowingly collect Personal Data from website users that are under 18 years of age. We are relying on your representations in the Terms that you are 18 years of age or older. You should not use the Website or our Services, including purchasing products, if you are not 18 years of age or older. If you believe we might have information from or about an individual under 18 years of age, please contact us at Privacy@VeritasGenetics.com.

14. International Transfer of Personal Data

Veritas may need to transfer your Personal Data within Veritas, and to third parties as noted above, in connection with the purposes set out in this Policy. For this reason, Veritas may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements. There is the possibility these countries will have a lower standard of protection than those that would apply in the country in which you are located in. Where Veritas transfers your Personal Data to other countries, it does so in accordance with applicable law. For example, transfers of EU resident data to non-EU countries are done on the basis of adequacy decisions, binding corporate rules, suitable Standard Contractual Clauses, or other valid legal data transfer mechanisms. For more information on these safeguards, please contact Veritas via Privacy@VeritasGenetics.com.

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15. Contact Details: How you can contact Veritas.

If you have comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by Veritas, please contact Veritas at:

Postal Address: Veritas Genetics, Inc. 99 Conifer Hill Drive Danvers, Massachusetts 01923, USA

Telephone: 1-888-507-6619

Email: Privacy@VeritasGenetics.com

16. Changes to this policy: How we'll contact you if we update this document.

Veritas may revise this Privacy Statement from time to time. All updates to this statement will be posted on this web page. If we make significant changes, Veritas will notify you by posting a notice on our Websites. Please check our Websites for the most current version of our Privacy Statement. Your continued use of the website after we have posted a notice on the website constitutes your acceptance of such changes.