

# Veritas Genetics Privacy Notice

## Overview

Veritas Genetics, Inc. and affiliates, ("Veritas," "we" or "us") is committed to protecting the privacy and security of all Personal Information 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 Information. 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](http://www.veritasgenetics.com), our "Website(s)"), and our online requisition portal [www.veritasgenetics.com/user/login](http://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 Information and strives to collect, use and disclose Personal Information 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](mailto:Privacy@VeritasGenetics.com).

## 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 Information.
- **Data Protection Authority:** An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **Genetic Data:** Personal Information 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 Information:** 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 Information or on sets of Personal Information, 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 Information on behalf of the Controller.
- **Sensitive Personal Information:** 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.

## 1. How do we collect Personal Information?

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

- Veritas obtains your Personal Information 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 Information when such collection is necessary to fulfill the services you have selected;
- Veritas may receive relevant Personal Information 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 Information 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 Information 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 Information.
- Additionally, Veritas creates Personal Information about you, such as records of your interactions with us, and details about your account, subject to applicable law.

## 2. What types of Information does Veritas Collect and Process?

Veritas takes reasonable steps to ensure that Personal Information Processed by Veritas is limited to the Personal Information 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 Information about you that Veritas Processes, subject to applicable law, are as follows:

- Genetic Data and health-related Personal Information 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, information about your sex life, sexual orientation, or your ethnicity;
- 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) and any further information you volunteer to provide to us;
- 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). If you contact us by email, we may keep a record of that correspondence. If you make a request with regard to the handling of your Personal Information, we may retain information regarding the request and any actions we take or correspondence we provide in response to such request;
- Website and device Personal Information (such as IP addresses, cookies, activity logs, online identifiers, unique device identifier, geolocation data). See our Cookies section below for more information.

## 3. Purposes and Legal Basis for Data Processing

The purposes for which Veritas may Process Personal Information, 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 via various channels including by phone, SMS text message, email, and physical mail, to support in the delivery of products and services or to send you important account-related communications. For example, communicating with you by phone to discuss your results, or sending you an email or text message to notify you that your results are ready. 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 improving products & services, and marketing (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](mailto: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 operating our website (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.
- **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.

#### 4. Children's privacy

We will not knowingly collect Personal Information 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 our site or its 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](mailto:Privacy@VeritasGenetics.com).

#### 5. Data Retention: How long we hold your Personal information.

Veritas takes reasonable steps to ensure that your Personal Information 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 Information is as follows:

- I. Veritas will retain copies of your Personal Information in a form that permits identification only for as long as:
  - A. Veritas maintains an ongoing relationship with you; or
  - B. Your Personal Information is necessary in connection with the lawful purposes set out in this Policy (see “3. 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 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 Information or to which your Personal Information may be relevant);
- III. In addition, if any relevant legal claims are brought, Veritas may continue to Process your Personal Information for such additional periods as are necessary in connection with that claim.

Once the applicable period has ended, Veritas will either:

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

## **6. Data Security: How we keep your Personal Information safe.**

Veritas has implemented appropriate technical and organizational security measures designed to protect your Personal Information 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.

## **7. Data Accuracy: How we make sure your Personal Information is accurate.**

Veritas takes reasonable steps to ensure that Personal Information that is Processed by Veritas is accurate, and, if necessary, up to date, and to ensure that any of your Personal Information 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 Information.

## **8. Third Parties: Who we may provide your Personal Information to, and why.**

We share Personal Information 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 Policy. Veritas may disclose your Personal Information 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 Information 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 Information, the Processor will be subject to binding contractual obligations to only Process the Personal Information in accordance with our prior written instruction, and to use measures to protect the confidentiality and security of the Personal Information, along with any additional requirements under applicable law;
- 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 '10. Notice to US Residents – 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 Information or de-identified information from research that has already been performed based on your Personal Information or de-identified information that was provided under a consent previously given. Types of third party research data sharing may include:
  - 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.
  - 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.
  - 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 Information 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.

## 9. International Transfer of Personal Information

Veritas may need to transfer your Personal Information 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 Information 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. Where Veritas transfers your Personal Information 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](mailto:Privacy@VeritasGenetics.com).



## 10. Notice to US Residents – Your Privacy Rights

This section is applicable to residents of the USA. While California and Virginia provide certain rights, if you are a resident of any US state we will endeavor to honor and action reasonable requests you make in relation to your data privacy, such as rights to delete or obtain a portable copy of information we hold about you. For California and Virginia residents, you have certain rights described below. The following do not apply to individuals who do not live in California and Virginia on a permanent basis.

### Rights provided by California Civil Code Section 1798.83

A California resident who has provided Personal Information to a business with whom he/she has established a business relationship for personal, family, or household purposes (a "**California Customer**") may request information about whether the business has disclosed Personal Information to any third parties for the third parties' direct marketing purposes. In general, if the business has made such a disclosure of Personal Information, upon receipt of a request by a California Customer, the business is required to provide a list of all third parties to whom Personal Information was disclosed in the preceding calendar year, as well as a list of the categories of Personal Information that were disclosed. California Customers may request further information about our compliance with this law by mailing us at Inc. 99 Conifer Hill Drive Danvers, Massachusetts 01923, USA, or emailing us at [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com). You may also contact us via toll free phone number at 1-888-507-6619. Please note that we are only required to respond to one request per California Customer each year under Code Section 1798.83.

### Rights under the California Consumer Privacy Act (CCPA) and the Virginia Consumer Data Privacy Act (VCDPA)

You may exercise your privacy rights where these are applicable to you at any time, by contacting us at [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com) or via toll free phone number at 1-888-507-6619. This includes if you wish to exercise any of the privacy rights as set out below, and/or as applicable to you in relation to your access to and use of (i) our products and services, or (ii) physician groups providing you with Virtual Health Services.

This section of our Privacy Policy provides California and Virginia residents with a description of our online and offline practices regarding the collection, use, disclosure, and sale of Personal Information and the rights of California and Virginia consumers regarding their Personal Information under the CCPA and VCDPA. This section applies to all California and Virginia residents (but not including legal entities, such as companies). The section will not apply, however, if we do not collect any Personal Information about you or if all of the information we collect is exempt from the statute (for example, the CCPA and VCDPA does not protect information that is already protected by certain other privacy laws such as HIPAA, and it does not protect information that is already publicly available). "Personal Information," for purposes of this section regarding the rights of California and Virginia residents, is to be understood in a manner consistent with the CCPA and VCDPA and does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

### **10.1. You have a right to know about Personal Information collected, disclosed, shared or sold.**

California and Virginia residents have the right to request that we disclose what Personal Information we collect, use, and disclose. This is called the "Right to Know". Under the Right to Know, you can request a listing of the types of Personal Information we have collected about you, the sources of that information, how we use the information (e.g., our business or commercial purposes for collecting, or selling Personal Information), other individuals and businesses with whom we share Personal Information, and the specific pieces of Personal Information that we have collected about you.

If you would like to make a request under your Right to Know, you may request this through [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com). If you would like the above information, contact information is at the bottom of this section. When you make a request under your Right to Know, you can expect the following:

1. We will verify your identity. We will verify your identity using the following process: Our customer care team will ask questions based upon information that you previously have provided. Where possible, we will use information we already hold about you in order to confirm that you are who you say you are.
2. We will confirm our receipt of your request within 10 days. If you have not received a response within a few days after that, please let us know by contacting us at [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com).
3. We will respond to your request within 45 days of receipt of the request, if possible. If necessary, we may need an additional period of time, up to another 45 days, but we will reply either way within the first 45-day period and, if we need an extension, we will explain why.
4. In certain cases, a Right to Know request may be denied, for example, if we cannot verify your identity or if providing you the information could create an unreasonable risk to someone's security (for example, we do

not want very sensitive information disclosed inappropriately). If we deny your request, we will explain why we denied it. If we deny a request, we will still try to provide you as much of the information as we can, but we will withhold the information subject to denial.

In the last 12 months, we have collected the following categories of personal information from individuals from the following sources:

Genetic data and health-related Personal Information including information in relation to your sex life or sexual orientation and details in relation your ethnicity

**Categories of Sources**

- You
- Your healthcare provider
- Labs

**Business or Commercial Purposes**

- To receive, store and analyze your Samples
- To receive, review, store and communicate Test Information
- To provide results
- To help facilitate your prescription order and delivery
- To de-identify information
- To fill and support purchases of products and services
- Customer assistance
- To combat activities that may violate our policies or agreements or be illegal

**Third Parties with Whom Shared:**

- Labs
- Healthcare Providers
- Public health agencies
- Service Providers
- Other third parties that support the ordering, processing, fulfillment and delivery of products and services
- Other third parties with your consent (such as your employer or insurer if you are testing through a program sponsored or subsidized by them)

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) and any further information you volunteer to provide to us

**Categories of Sources**

- You
- A licensed physician authorized by you (e.g. your licensed physician may provide us with certain necessary personal information for purposes of providing you with a Test.)

**Business or Commercial Purposes**

- To receive, store and analyze your samples
- To receive, review, store and communicate test information
- To provide results
- To help facilitate your prescription order and delivery
- To de-identify information
- To fill and support purchases of products and services
- Processing payments
- Customer assistance
- Site development
- Marketing
- Administer, support and improve our business.
- To combat activities that may violate our policies or agreements or be illegal
- To retain certain tax and accounting records.

**Third Parties with Whom Shared:**

- Service Providers
- Payment processors
- Labs
- Pharmacies
- Healthcare Providers
- Public health agencies
- Marketing affiliates

- Other third parties with your consent (such as your employer or insurer if you are testing through a program sponsored or subsidized by them)

Authentication data (such as passwords or security questions & answers)

**Categories of Sources**

- You

**Business or Commercial Purposes**

- To verify and identify

**Third Parties with Whom Shared:**

- Identity Verification Service Providers

Contact details (such as address, telephone number, email address, social media profiles if contacting us over social media):

**Categories of Sources**

- You and other correspondents

**Business or Commercial Purposes**

- To fill and support purchases of Products and Services
- Processing payments
- Customer assistance
- Site development
- Marketing
- Administer, support and improve our business.
- To combat activities that may violate our policies or agreements or be illegal
- To retain certain tax and accounting records.

**Third Parties with Whom Shared:**

- Social media
- Marketing affiliates
- Payment processors
- Tax agencies
- Other third parties with your consent (such as your employer or insurer if you are testing through a program sponsored or subsidized by them)

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):

**Categories of Sources**

- You
- Your healthcare provider

**Business or Commercial Purposes**

- To receive, store and analyze your samples
- To receive, review, store and communicate Test Information
- To provide results
- To help facilitate your prescription order and delivery
- To de-identify information
- To fill and support purchases of products and services
- Customer assistance
- To combat activities that may violate our policies or agreements or be illegal

**Third Parties with Whom Shared:**

- Labs
- Healthcare Providers
- Public health agencies
- Service Providers
- Other third parties that support the ordering, processing, fulfillment and delivery of products and services
- Other third parties with your consent (such as your employer or insurer if you are testing through a program sponsored or subsidized by them)

Views, Feedback and opinions any views or opinion that you choose to send to us

**Categories of Sources**

- You



**Business or Commercial Purposes**

- Site development
- Marketing
- Administer, support and improve our business

**Third Parties with Whom Shared:**

- Service Providers
- Other third parties with your consent (such as your employer or insurer if you are testing through a program sponsored or subsidized by them)

Website and Device Personal Information**Categories of Sources**

- You
- Your devices

**Business or Commercial Purposes**

- Track use of Site and Services
- Increase navigation efficiency of the Site
- Personalization of the Site
- Site development.

**Third Parties with Whom Shared:**

- Marketing Vendors
- Analytics Vendors

**10.2. You have a Right to Request Deletion of Personal Information about You.**

California and Virginia consumers have a right to request the deletion of their Personal Information collected or maintained by us. If you would like information about you to be deleted, you may request deletion through [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com). When you make a request for deletion, you can expect the following:

1. After you request deletion, you will need to confirm that you want your information deleted.
2. We will verify your identity. We will verify your identity using the following process: Our customer care team will ask questions based upon information that you previously have provided. Where possible, we will use information we already hold about you in order to confirm that you are who you say you are.
3. We will confirm our receipt of your request within 10 days. If you have not received a response within a few days after that, please let us know by contacting us at the email address or phone number listed below.
4. We will respond to your request within 45 days of receipt of the request, if possible. If necessary, we may need an additional period of time, up to another 45 days, but we will reply either way within the first 45-day period and, if we need an extension, we will explain why.
5. In certain cases, a request for deletion may be denied, for example, if we cannot verify your identity, the law requires that we maintain the information (e.g., in case of certain tests) or if we need the information for internal purposes such as ongoing research. If we deny your request, we will explain why we denied it, treat your request as an "opt-out" of the sale of information (as described in our Notice of Right to Opt-Out), and delete any other information that is not protected from deletion.

**10.3. You have a Right to Request the Correction of Inaccurate Personal Information about You.**

California and Virginia consumers have a right to request the correction of inaccurate personal information collected or maintained by us. If you would like information about you to be corrected, you may request correction through the contact information at [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com). When you make a request for correction, you can expect the following:

1. After you request for correction, you will need to confirm what information is incorrect and requires correction.
2. We will verify your identity. We will verify your identity using the following process: Our customer care team will ask questions based upon information that you previously have provided. Where possible, we will use information we already hold about you in order to confirm that you are who you say you are.
3. We will confirm our receipt of your request within 10 days. If you have not received a response within a few days after that, please let us know by contacting us at the email address or phone number listed below.
4. We will respond to your request within 45 days of receipt of the request, if possible. If necessary, we may need an additional period of time, up to another 45 days, but we will reply either way within the first 45-day period and, if we need an extension, we will explain why.
5. In certain cases, a request for correction may be denied, for example, if we cannot verify your identity. If we deny your request, we will explain why we denied it.

#### **10.4. You have a Right to Opt-Out of the Sale or Sharing of Personal Information**

Personal Information obtained from cookies is shared with third parties e.g. to allow for targeted marketing on third party sites such as social media websites. This is not a monetary sale of your data, however it may still be considered a “Sale of Personal Information” under the CCPA, VCDPA or similar laws. You can exercise your right to opt-out of that sharing at any time by disabling cookies. To action your right to opt out of this sharing, please refer to our cookies section below for more information.

**We do not sell personal information for any purpose other than what is referred to under this section.**

#### **10.5. You have a Right to Limit Use and Disclosure of Sensitive Personal Information**

California and Virginia consumers have the right, at any time, to request the limit of use of your Sensitive Personal Information unless the use of this Sensitive Personal Information is necessary to perform the services or provide the goods reasonably expected by you. Sensitive Personal Information includes Personal Information that reveals your social security, driver’s license, state identification card, or passport number; your account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; your precise geolocation; your racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a your mail, email, and text messages unless Veritas Genetics is the intended recipient of the communication; your genetic data; the processing of biometric information for the purpose of uniquely identifying you; Personal Information collected and analyzed concerning your health; Personal Information collected and analyzed concerning your sex life or sexual orientation. Veritas Genetics will only use your Sensitive Personal Information to perform services or provide the goods reasonably expected by you.

#### **10.6. Right to opt out of the processing of the Personal Information for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.**

Virginia residents have a right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects concerning. Veritas Genetics may use health-related or similar questionnaires to determine eligibility for certain products or services. To learn more or opt out of anything that may be considered profiling, please contact [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com).

#### **10.7. You have a Right to Non-Discrimination/No Retaliation for the Exercise of a Consumer's Privacy Rights**

You have a right not to receive discriminatory treatment by us for exercising any of your privacy rights conferred by the CCPA. We will not discriminate against any California consumer because such person exercised any of the consumer's rights under CCPA, including, but not limited to:

- Denying goods or services.
- Charging different prices or rates for goods and services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services.
- 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.

We may, however, charge a different price or rate, or provide a different level or quality of goods or services, if that difference is related to the value provided to you by your data.

#### **10.8. Your Right to Appeal**

If Veritas Genetics refuses to take action on any of the above rights, you can appeal this decision by emailing [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com). Within 60 days of receipt of an appeal, Veritas Genetics shall inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

For Virginia residents, if the above appeal is denied, you may contact the Virginia Attorney General to submit a complaint via the OAG Online Consumer Complaint Form ([state.va.us](http://state.va.us)).

#### **10.9. Authorized Agents**

If you would like, you may designate an authorized agent to make a request under the CCPA on your behalf. We will deny requests from agents that do not submit proof of authorization from you. To verify that an authorized

agent has authority to act for you, we may require a copy of a power of attorney or require that you provide the authorized agent with written permission and verify your own identity with us.

## 10.10. Contact Information

To request additional information, or make any of the requests described above, you may contact us at [Privacy@VeritasGenetics.com](mailto:Privacy@VeritasGenetics.com) or via toll free phone number at 1-888-507-6619 or through our website.

## 11. Veritas Genetics Cookies

### What is a cookie and how are they used on our Website?

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.

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 Website 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 Website; 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 third-party marketing service provider websites below). Alternatively, you may be able to opt out of a third-party 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.
- **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 Analytics

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.

### More Information

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

### 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 Information 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](mailto:Privacy@VeritasGenetics.com)

### 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.

This Privacy Statement was last updated in January 2023.