

GDPR Privacy Policy

EFFECTIVE DATE: May 25, 2018

Veritas Genetics Inc. and affiliates, ("Veritas," "we" or "us") is committed to protecting the privacy of all visitors to the Veritas website. Veritas has established this GDPR Privacy Policy to inform you of the specific practices and guidelines that help ensure the security and confidentiality of your personal information. By using or accessing in any way the websites we control and operate, including www.veritasgenetics.com (our "Website(s)"), and our online requisition portal www.veritasgenetics.com/user/login (our "Account Portal") or by transmitting information to us by email or other electronic means, you agree to the terms of this GDPR Privacy Policy. If you do not agree with the terms of this GDPR Privacy Policy, please do not access or use the Websites.

Veritas is committed to upholding the confidentiality of personal information and strives to collect, use and disclose personal information in a manner consistent with the laws and regulations of the countries in which it does business.

1. Your Legal Rights: What Rights you have to your Data.

Subject to applicable law, you have a number of rights regarding the Processing of your Personal Data. These rights include:

- 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.
- 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 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.

2. Data Minimization: How much Data we collect.

Veritas take 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.

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

Veritas take reasonable steps to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Policy. 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, for which Veritas has a valid legal basis.
- ii. Additionally, Veritas will retain copies for the duration of:
 - A. 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); and
 - B. An additional 2 (two) month period following the end of any such applicable limitation period.
- 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 (B), 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;
- Achieve your Personal Data so that it is beyond use; or
- Anonymise the Relevant Personal Data.

4. 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 Processing.

Information that you provide to Veritas through these Websites is encrypted using industry standard Secure Sockets Layer (SSL) technology, with the exception of information you send via email. 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.

5. 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.

6. Disclosure of Personal Data to Third Parties: Who we may provide your Data to, and why.

Veritas may disclose your Personal Data to other entities for legitimate business purposes (including providing services to you and operating our Websites) in accordance with applicable law. In addition, Veritas may disclose your Personal Data to:

- You, and, where appropriate, your family or authorized legal representative.

- Your Physician (where appropriate)
- Third party Processors (e.g. payment services providers, shipping companies, etc).
- Web service providers: (e.g. cloud storage, data aggregation services, targeted marketing)
- 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.
- Any relevant party for the purposes of prevention, investigation, detection or prosecution of illegal activity that may expose us to legal liability or costs, to enforce our policies governing our Websites.

Our Websites may use third party plugins or content. If you chose 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 recommend 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.

Veritas uses Amazon Web Services ("AWS") as a Processor. For more information about the protections offered by AWS, please visit their webpage at <https://aws.amazon.com/compliance/eu-data-protection/>.

Veritas uses Microsoft Azure (Microsoft) as a Processor. For more information about the protections offered by Microsoft, please visit their webpage at <https://www.microsoft.com/en-us/trustCenter/privacy/gdpr>.

7. Cookies: How our website collects information.

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.

8. Direct Marketing: We may, with your consent, contact you with new products or services.

Veritas may Process your Personal Data to contact you, primarily via email, so Veritas may provide you with information concerning products and services that may be of interest. Veritas will not take these actions without having first obtaining your consent. If you do not wish to receive marketing emails from us, you can opt out at any time.

9. International Transfer of Personal Data: Why Veritas may transfer your data overseas.

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 is on the basis of:

- Adequacy decisions;
- Binding Corporate Rules;
- Suitable Standard Contractual Clauses; or
- Other valid transfer mechanisms.

For more information on these safeguards, please contact Veritas via the information provided in Section 12.

10. Processing your Personal Data: How Veritas uses your Personal Data.

Collection of 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 or telephone or by other means).
- Veritas may request your Personal Data when such collection is necessary to fulfill the services you have selected.
- Veritas collects your Personal Data in the ordinary course of our relationship with you.
- Veritas collects Personal Data that you manifestly choose to make public, including Social Media.
- Veritas receives Personal Data from third parties who provide it to us (e.g. your doctor, law enforcement agencies)
- Veritas receives Personal Data from third parties when you purchase any of our products or services through such third parties.
- 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.

Creation of Personal Data: Veritas creates Personal Data about you, such as records of your interactions with us, and details about your account, subject to applicable law.

Relevant Personal and Sensitive Personal Data: The categories of Personal and Sensitive Personal Data about you that Veritas Processes, subject to applicable law, are as follows:

- Registration Information: Personal Details (name; gender; date of birth; age; nationality)
- Authentication data (passwords; security questions & answers)
- Contact details (address; telephone number; email address; social media profiles)
- Referral Information: Details on people or entities you'd like your data shared with (i.e. Doctor, Family Member)
- Views and opinions: any views or opinion that you choose to send to us.
- Genetic Data: As submitted to us for testing in relation to Veritas Products.
- Electronic identifying Data: IP addresses; cookies; activity logs; online identifiers; unique device identifiers; geolocation data.
- Job application information (references or background check for job applicants, resume, contact information, employment and education history).

Processing your Sensitive Personal Data: Veritas will seek to collect or otherwise Process your Sensitive Personal Data only when:

- Veritas has, in accordance with applicable law, obtained your explicit consent prior to processing your Sensitive Personal Data. (I.E. in relation to ordering a Veritas product).
- The Processing is necessary for the detection or prevention of crime, to the extent permitted by applicable law.
- The Processing is necessary for compliance with a legal obligation.
- The Processing is necessary for the establishment, exercise or defense of legal rights.

- The Processing is necessary for reasons of substantial public interest, and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interest.

Purposes for which Veritas may Process your Personal Data, and legal basis for 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:

Processing Purpose	Legal basis for Processing
Genetic Sequencing: Performing genetic sequencing for customers, processing and delivering results.	<ul style="list-style-type: none"> • 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 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: To respond to customer inquiries, provide information about our website, communicate with you about transactions, provided technical support,	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you may enter into with us, or take steps prior to entering into a contract with us. • Veritas has obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary).
Legal Compliance: Compliancy with legal and regulatory obligations under applicable law, screening against sanction lists.	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation. • 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).
Legal Proceedings: Establishing, exercising, and defending legal rights.	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation. • 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: 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).	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation. • 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).
Marketing: communications via email, phone, or other means, subject to ensuring that such communications are provided to you in compliance with applicable law.	<ul style="list-style-type: none"> • 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 has obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary).
Operation of Website: Operation, management, and improvement of our Website, communicating and interacting with you via Our Website.	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you may enter into with us, or take steps prior to entering into a contract with us. • Veritas has a legitimate interest in carrying out the Processing for the purposes of establishing, exercising, or

	<p>defending our legal rights (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).</p> <ul style="list-style-type: none"> • Veritas has obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary)
IT Operations: Management of our communications systems, operation of IT security, Security audits.	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation • The Processing is necessary in connection with any contract that you may enter into with us, or take steps prior to entering into a contract with us. • 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).
Investigations: Detecting, investigating and preventing breaches of policy	<ul style="list-style-type: none"> • 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: Identifying issues and planning improvements for existing products and services, creating new products and services.	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you may enter into with us, or take steps prior to entering into a contract with us. • 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 has obtained your express prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary)

11. Scope: Who this policy applies to.

This GDPR Privacy Policy (the “Policy”) sets forth the privacy principles that Veritas follows with respect to the processing of personal data where:

- a. The processor or controller is located within the European Union (EU);
- b. The data subject is located within the EU, by a controller or processor not established in the EU, where the processing relates to:
 - i. The offering of goods or services to data subjects in the EU;
 - ii. The monitoring of data subject’s behavior, as far as it takes places in the EU.
- c. The controller is not established in the EU, but in a place where EU Member State law applies by virtue of public international law.

NOTE: Veritas intends to provide GDPR protection consistently to individuals, regardless if GDPR applies.

12. 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:

Veritas Genetics Inc.
 99 Conifer Hill Drive
 Danvers, Massachusetts, USA
 1-888-507-6619
support@veritasgenetics.com

13. 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.

14. Definitions: How specific terms are defined.

TERM	Definition
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;
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;
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
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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
Processor	a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

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