

Safe Harbor Privacy Policy

EFFECTIVE DATE: April 1, 2015

Veritas Genetics (“Veritas Genetics”) respects individual privacy and values the confidence of its customers, employees, healthcare professionals, consumers and business partners.

Veritas Genetics 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. Veritas Genetics fully intends to follow all applicable regulations promulgated on the topic of transatlantic exchanges of personal data for commercial purposes, including the EU-US Privacy Shield and The Data Protection Act 1998 of the United Kingdom. Further, Veritas Genetics is committed to fully preparing for the upcoming General Data Protection Regulations (GDPR) which are set to come into enforcement on May 25, 2018.

This Safe Harbor Privacy Policy (the “Policy”) sets forth the privacy principles that Veritas Genetics follows with respect to personal information transferred from the European Economic Area (“EEA”) (which includes the 27 member states of the European Union (EU) plus Iceland, Liechtenstein and Norway) and Switzerland to the United States of America.

1. SAFE HARBOR

The United States Department of Commerce, the European Commission and the Swiss Federal Data Protection and Information Commissioner (FDPIC) have jointly agreed on a set of data protection principles and frequently asked questions (the “Safe Harbor Principles”) to enable U.S. companies to satisfy the requirement under European Union and Swiss law that adequate protection is given to personal information transferred from the EU or Switzerland to the United States.

The EEA and Switzerland have recognized the U.S. Safe Harbor as providing adequate data protection. Veritas Genetics has established a comprehensive Privacy and Security Compliance program and is committed to protecting personal privacy consistent with the seven Safe Harbor Principles.

2. SCOPE

This Safe Harbor Privacy Policy (the “Policy”) applies to all personal information received by Veritas Genetics in the United States of America from the EEA and Switzerland, in any form including electronic, paper or verbal.

3. DEFINITIONS

For purposes of this Policy, the following definitions shall apply: "Agent" means any third party that collects or uses personal information under the instructions of Veritas Genetics or to which Veritas Genetics discloses personal information for use on Veritas Genetics' behalf.

"Veritas Genetics" means Veritas Genetics, its successors, affiliates, subsidiaries, divisions and groups in the United States of America.

"Personal information" means any information or set of information that identifies or is used by or on behalf of Veritas Genetics to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information. "Sensitive personal information" means personal information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, or that concerns health or sex life. Veritas Genetics will treat any information received from a third party as sensitive personal information where that third party treats and identifies the information as sensitive personal information.

4. PRIVACY PRINCIPLES

The privacy principles in this Policy are based on the Safe Harbor Principles. Notice: Where Veritas Genetics collects personal information directly from individuals in the EEA or Switzerland, it will inform them about the purposes for which it collects and uses such personal information and the type of Agents to which it discloses such information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide

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personal information to Veritas Genetics, or as soon as practicable thereafter, and in any event before Veritas Genetics uses or discloses the information for a purpose other than that for which it was originally collected. Where Veritas Genetics receives personal information from its subsidiaries, affiliates or other entities in the EEA or Switzerland, it will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals with respect to their personal information.

Choice: Veritas Genetics does not use personal information for purposes other than which it was collected, i.e., the provision of Veritas Genetics laboratory services. Personal information is not disclosed to non-agent third parties.

Onward Transfer: Veritas Genetics ensures that any Agent to whom it transfers personal information will safeguard personal information consistent with the terms of this Policy. The majority of Agents to whom Veritas Genetics transfers sensitive personal information are subject to the Health Information Portability and Accountability Act of 1996 (HIPAA) and are bound to protect the privacy and security of patient information. In the event that information is transferred to an Agent who is not subject to the HIPAA Rules, Veritas Genetics will assure that: the Agent is contractually obligated to provide at least the same level of protection as is required by HIPAA; is subject to EU Directive 95/46/EC (the EU Data Protection Directive); has certified to the Safe Harbor, or is subject to another European Commission adequacy finding (e.g., companies located in Switzerland). Where Veritas Genetics has knowledge that an Agent is using or disclosing personal information in a manner contrary to this Policy, Veritas Genetics will take all reasonable steps to prevent or stop that use or disclosure.

Security: Veritas Genetics will take all reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. Veritas Genetics uses a combination of technologies, procedures and organizational measures to safeguard personal information. **Data Integrity:** Veritas Genetics will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Veritas Genetics will take all reasonable steps to ensure that personal information is relevant to its intended use and is accurate, complete and current. **Access And Correction:** Upon request, Veritas Genetics will grant individuals reasonable access to personal information that it holds about them. In addition, Veritas Genetics will take reasonable steps to permit individuals to correct, amend or delete information that is inaccurate or incomplete. Veritas Genetics will take reasonable steps to facilitate amendments to information provided by third parties if an individual raises a query. **Enforcement:** Veritas Genetics will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that Veritas Genetics determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

Dispute Resolution: Any questions or concerns regarding the use or disclosure of personal information should be directed to the Veritas Genetics Privacy Officer at the address given below. Veritas Genetics will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Veritas Genetics and the complainant, Veritas Genetics has agreed to participate in the dispute resolution procedures of the panel established by the European Data Protection Authorities and the Swiss Federal Data Protection and Information Commissioner to resolve disputes pursuant to the Safe Harbor Principles.

5. LIMITATION ON APPLICATION OF PRINCIPLES

Adherence by Veritas Genetics to these Safe Harbor Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; and (b) to the extent expressly permitted by an applicable law, rule or regulation.

6. INTERNET PRIVACY

Veritas Genetics sees the Internet and online technologies as valuable tools for communicating and interacting with consumers, employees, healthcare professionals, business partners and others. Veritas Genetics recognizes the importance of maintaining the privacy of information collected and/or stored online and has created an Internet Privacy Policy governing personal information collected or stored through the websites it operates. With respect to personal information that is transferred from the EEA or Switzerland to the United States of America the

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Privacy Policy is subordinate to this policy. However, the Privacy Policy also reflects additional legal requirements and evolving standards with respect to Internet privacy.

7. CONTACT INFORMATION

Questions or comments regarding this Policy should be submitted to the Veritas Genetics Privacy Officer by mail as follows:

Veritas Genetics
Attention: Privacy Officer
99 Conifer Hill Dr.
Danvers, MA 01923
USA
privacy@veritasgene.com

8. CHANGES TO THIS SAFE HARBOR PRIVACY POLICY

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. If we make changes to this Policy, we will promptly post a copy of the updated Policy on our website www.veritasgene.com. A notice will be posted on Veritas Genetics' website whenever this Safe Harbor Privacy Policy is changed in a material way.