

# Information Management and Governance Policy

Effective Date: June 01, 2020

## Introduction

We are committed to respecting and protecting your privacy.

21<sup>ST</sup> Century Health Analytics Pte. Ltd. ('us', 'we', or 'our') operates the <https://www.genixpro.com> website and GENIXPRO™ web and mobile application(s) (the 'Service').

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. Please read the following carefully to understand our views and practices regarding your personal data and how we will safeguard and treat it.

By visiting <https://www.genixpro.com> or by using and/or installing GENIXPRO™ web and mobile application(s), you are accepting and consenting to the practices described in our privacy policy.

We use your data to provide and enhance the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Service.

## Definitions

- Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

- Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

- Cookies

Cookies are small pieces of data stored on a User's device.

- Data Controller

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your data.

- Data Protection Officer

For the purpose of this Privacy Policy, our nominated Data Protection Officer is Sriram Prasad, 21<sup>st</sup> Century Health Analytics Pte. Ltd., 160 Robinson Road, #26-02, Singapore 068914.

- Data Processors (or Service Providers)

Data Processor (or Service Providers) means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

- Data Subject

Data Subject is any living individual who is the subject of Personal Data.

- User

The User is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

## Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

## Information We Collect from You

- Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ('Personal Data'). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Identification number
- Phone number
- Address, State, Postal code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

- Health and Lifestyle Information
  - This is information from the questionnaires on our site about your health, including your own and your close relatives' medical history, treatments received or ongoing, known allergies, medications, known long term conditions and relevant lifestyle information such as smoking or alcohol consumption.
  
- Biological Samples

- These are the saliva and/or stool samples which you provide to us to enable us to perform the testing services.

## Information Derived from Information You Give Us

- Genetic Data
  - This is uninterpreted DNA raw data which we receive from our laboratories and which is stored and displayed to you in your personal account and reports. Upon request and payment of any applicable fees\*, the raw data may also be downloaded as a \*.txt file or as a \*.csv file. This information, in anonymized form, is also used for interpretation (see below), and you must consent to that before you submit an order for our testing services.
- Results of Interpretation
  - These include health, nutrition, sports, ancestry\* and personal traits data which are derived from interpretation of your health and lifestyle information and raw data and which we display to you in your personal account. All this information is stored on secure servers hosted on Microsoft Azure (Azure Cloud Computing Services) and under our control.

## Information We Collect about You

- Usage Data
  - We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ('Usage Data').

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), your login information, browser type, browser version, browser plug-in types and versions, operating system and platform, time zone setting, clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, any phone number used to call our customer service number, the time and date of your visit, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

- Tracking Cookies Data

- We use cookies and similar tracking technologies to track user activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some parts of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

- Information from Third Parties

- We may be provided personal information from the companies which serve as our sales partners, distributors or are otherwise related to our sales channels. This information generally includes, but may be not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City

We make reasonable efforts to ensure that all these parties comply with respective national and international data privacy

regulation(s).

## Use of Data

We use the collected data for a variety of purposes, including but not limited to:

- Provide and maintain our Service
- Notify you about changes to our Service
- Allow you to participate in interactive features of our Service when you choose to do so
- Provide customer support
- Gather analytics or valuable information so that we can enhance our Service
- Monitor the usage of our Service
- Detect, prevent and address technical issues
- Provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

We primarily use the following types of information for the following purposes:

- Information We Collect from You
  - We may use your personal details:
    - to provide you with the testing services that you request from us;
    - to notify you about changes to our Service; and
    - to ensure that content from our site is presented in the most effective manner for you and for your Service access device (like personal computer).
  - We may use your health information and biological samples to provide you with the testing services you request from us.
- Information Derived from Information You Give Us
  - We may use your raw data and the results of interpretation to provide you with the testing services that you request from us.
  - We may use anonymized and aggregate raw data to identify disease patterns and for other interpretive purposes. Anonymized and aggregate raw data has been stripped of your name and other contact information and aggregated with other customers' raw

data so that you cannot reasonably be identified as an individual from that information.

- Information We Collect about You
  - We may use this information:
    - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
    - to improve our site to ensure that content is presented in the most effective manner for you and for your Service access device (like personal computer);
    - to allow you to participate in interactive features of our Service, when you choose to do so;
    - as part of our efforts to keep our site safe and secure; and
    - to provide you with the results of interpretation.
- Information from Third Parties
  - The data we obtain from these sources may further be used by us:
    - to provide you with the testing services that you request from us; and
    - to notify you about changes to our Service.

## Retention of Data

We may retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We may retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We may also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

- Where We Store Your Information

The data that we collect from you may be stored at a destination within Asia and/or the United States. It may also be processed by our staff. This includes staff engaged in, among other things, the fulfillment of your order, the processing of your payment details and the provision of support and related services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps

reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on secure servers hosted on Microsoft Azure (Azure Cloud Computing Services). Any payment transactions may be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information over the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try and prevent unauthorized access.

Biological samples are stored at our partner laboratories, which may be CLIA and CAP accredited\* and ISO certified\* (namely: ISO 17025, ISO 13485, ISO 14001), adhering to guidelines which include industry standards for the storage of samples taken from humans. We may store the samples at least for 6 months\*, although we retain the right to store the samples for an indefinite period.

## **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Asia and choose to provide information to us, please note that we transfer the data, including Personal Data, to servers located across Asia and process it there.

You have given informed consent to this Privacy Policy when you initially accessed our Services, that informed consent is also consent for us to make these transfers.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless



there are adequate controls in place including the security of your data and other personal information.

## Disclosure of Data

- Disclosure for Law Enforcement

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

- Legal Requirements

We may disclose your Personal Data in good faith that such action is necessary to:

- Comply with a legal obligation
- Protect and defend our rights and/or our property
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

- Service Providers

We may employ third party companies and individuals to facilitate our Service ('Service Providers'), to provide the Service on our behalf, to perform Service-related requests and/or to assist us in analyzing how our Service is used.

These third parties may have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

- Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

- Google Analytics

Google Analytics is a web analytics service offered by Google LLC. that tracks and reports website traffic. Google uses the data

collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page located at <https://www.google.com/intl/en/policies/privacy>

- Firebase

Firebase is analytics service provided by Google LLC. You may opt-out of certain Firebase features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy: <https://www.google.com/intl/en/policies/privacy>

We also encourage you to review Google's policy for safeguarding your data: <https://support.google.com/analytics/answer/6004245>. For more information on what type of information Firebase collects, please visit please visit the Google Privacy Terms web page: <https://www.google.com/intl/en/policies/privacy>

- Amplitude

Amplitude is analytics service provided by Amplitude, Inc. You may opt-out of certain Amplitude features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Amplitude, Inc in their Privacy Policy: <https://amplitude.com/privacy>

- Yandex.Metrica

Yandex.Metrica is analytics service provided by Yandex LLC. You may opt-out of certain features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Yandex LLC in their Privacy Policy: <https://yandex.com/legal/confidential>

- Bing

Bing is analytics service provided by Microsoft. You may opt-out of certain Microsoft features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Microsoft in their Privacy Policy: <https://privacy.microsoft.com/en-US/privacystatement>

- Behavioral Remarketing

We may use remarketing services to advertise to you on third party websites, after you may have visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

- Google AdWords

Google AdWords remarketing service is provided by Google LLC. You may opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <https://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://www.google.com/intl/en/policies/privacy>

- Facebook

Facebook remarketing service is provided by Meta Platforms, Inc. (f.k.a Facebook, Inc.). You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/516147308587266>

To opt-out from Facebook's interest-based ads follow these instructions from

Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online

Behavioral Advertising established by the Digital Advertising Alliance. You may also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <https://www.aboutads.info/choices>, the Digital Advertising Alliance of Canada in Canada <https://youradchoices.ca> or the European Interactive Digital Advertising Alliance in Europe <https://www.youronlinechoices.eu>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

- Referral Marketing
  - Refersion

Refersion is a referral marketing service we may use to increase our sales, provided by Refersion Inc. It enables paying bonuses for the third parties that generate purchases on our website by directing customers to our website. We do not provide to Refersion any personal data and we only provide the anonymous IDs of the users who made purchases at our website as well as the purchase details (quantity and price of the items sold).

For more information on the privacy practices of Refersion, please visit Refersion's Privacy Policy: <https://www.refersion.com/privacy>

- Payments

We may provide paid products and/or services within the Service. In such instance, we may use third-party services for payment processing (e.g. payment processors).

We may not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover.

PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

- Apple Store In-App Payments

Their Privacy Policy can be viewed at <https://www.apple.com/legal/privacy/en-ww>

- Stripe

Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>

- Logistics Companies

The logistics companies enable delivery of our test kits to you or deliver your biological samples to our partner laboratories.

- SingPost

Singapore Post may deliver our test kits to you and return samples back to us, and in certain cases, manage the kits delivery by their partner companies. We provide to SingPost the following information about you:

- First name and last name
- Address, State, Province, ZIP/Postal code, City
- Email address\*
- Phone number\*

SingPost may further provide this information to their partner company which will deliver our test kits to you or return your sample back to us.

For more information about SingPost privacy and legal please visit <https://www.singpost.com/privacy-policy>

- DHL

DHL handles the delivery of your biological samples to one of our laboratories. It will not receive your personal information from us and neither it is required for you to provide any personal

information to DHL to get your biological samples delivered to a respective laboratory.

- Web services

We use certain web services for the following purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analytics or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

## Microsoft Azure Cloud Computing Services

Microsoft Azure (Azure) is a subsidiary of Microsoft Corporation that provides on-demand cloud computing platforms. We store our data and services on the Azure servers located in Asia.

We do not provide your personal data to Azure staff and take all the reasonable steps to protect it. However, we understand that Azure may disclose any information stored on their servers, including your personal and genetic data, if they are required to do so to comply with the law, or with a valid and binding order of a governmental or regulatory body.

For more information about the AWS privacy please view <https://azure.microsoft.com/en-us/overview/trusted-cloud/privacy/>

## Twilio SendGrid

Twilio SendGrid is customer communication platform for transactional and marketing email. Transactional email is a type of automated email between a sender and a recipient. It differs from promotional or marketing email in that transactional email is triggered by events,

interactions, or preferences within a Service or application rather than by a company's marketing campaign. We may use your personal data, including your name and surname, your email, and the information about your Service interaction, behavior while using our Service, orders to send you emails through SendGrid.

We do share your personal data with the SendGrid staff and take all the reasonable steps to protect it. However, we understand that SendGrid may disclose the information, including your personal data, if they are required to do so to comply with the law, or with a valid and binding order of a governmental or regulatory body.

For more information about SendGrid privacy please view <https://api.sendgrid.com/privacy.html>

## Zendesk Support

Zendesk Support is a system for tracking, prioritizing, and resolving customer support tickets by Zendesk Inc. We use it for providing customer support to you. For the purpose of providing such customer support, we may use your personal information, such as your name and surname, your email, you phone number, your address (including state, postal code and city), your order information and your behavior while using our Services. The actual range of information we use for this purpose depends on the nature of your request and on the information you indicate and provide us via Zendesk Support.

We do not share your personal data with Zendesk Inc. staff and take all the reasonable steps to protect it. However, we understand that Zendesk Inc. may disclose the information, including your personal data, if they are required to do so to comply with the law, or with a valid and binding order of a governmental or regulatory body.

Their Privacy Policy can be viewed at <https://www.zendesk.com/company/customers-partners/privacy-policy>

- Our Partner Laboratories

Our partner laboratories are located in Singapore, India, United States and the European Union. We do not share any personally identifiable information (PII) with our partner laboratories, and they

receive your biological samples only and process them anonymously.

## Data Security

Security of your data is important to us. However, remember that no method of data transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Do Not Track Signals

We do not support Do Not Track ('DNT'). Do Not Track is a preference you may set in your web browser to inform websites that you do not wish to be tracked.

You may enable or disable Do Not Track by visiting the Preferences or Settings page of your preferred web browser.

## Your Rights

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever made possible, you can update your Personal Data directly within your account settings section. If you are unable to change your Personal Data, please contact us to make the required changes.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

You have the right at any time:

- To access and receive a copy of the Personal Data we hold about you. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it. Please note that we may ask you to verify your identity before responding to such requests.
- To rectify any Personal Data held about you that is inaccurate

You have the right at any time to request that:

- We remove your sample at any time by sending an e-mail to [EHS@genixpro.com](mailto:EHS@genixpro.com) with the keyword 'Withdraw Consent' in the email title



- We delete your Personal Data, health information and individual level genetic data by sending an email to [EHS@genixpro.com](mailto:EHS@genixpro.com) with the keyword 'Delete Forever' in the email title.

### **Please note that:**

- if you request the removal or deletion of any data before the testing services have been completed, this may affect our ability to provide your results to you; and
- there may be certain information that we are required by law to retain for a definite period, in which case we will only be able to delete the information once that period has expired.

### **Please also note that:**

- We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our Service, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems
- We will aim to delete your Personal Data after your request within the shortest time possible and within the maximum period of six months. However, there may be some delay in deleting your Personal Information from our backup systems after it has been deleted from our production, development, analytics, and research systems. Also, our partner laboratories may retain information they receive from us in order to comply with laws or regulations that may require them to do so

## **Your Use of Information**

You should be very careful about sharing or discussing your results on social media or with friends, family, employers or third parties such as insurers. The information could be used to your disadvantage and/or passed on to other parties to whom you did not intend to disclose your results.

## **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy

policies or practices of any third party sites or services.

## Children's Privacy

We are committed to protecting individual privacy. Our Service may be available to children under the age of 18 ('Children'), however the Service request must be initiated and consented to by a parent, guardian or consulting healthcare practitioner. The parent, guardian or consulting healthcare practitioner assumes full responsibility for ensuring that the information that they provide to us about the child is kept secure and that the information submitted is accurate.

## Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the 'Effective Date' at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: [EHS@genixpro.com](mailto:EHS@genixpro.com)
- By visiting our website: <https://www.genixpro.com>

By mail: 160 Robinson Road, #26-02, Singapore 068914