



## WEBSITE AND DATA PRIVACY NOTICE

At VIDA Diagnostics Inc. (henceforth referred to as “VIDA,” “us,” “our,” and “we”), we value and respect individual privacy and are strongly committed to safeguarding personal information. Our customers, business partners, website users, clinical trial and health care partners and their patients, and data protection authorities expect that we will uphold this commitment with respect to the collection, use, and retention of personal information. This policy sets forth the standards that govern our treatment of such Personal Information.

## DEFINITIONS

“**Agent**” means a third party who acts on behalf of and under the instruction of VIDA.

“**Personal Information**” or “**information**” means information that (1) is transferred from the EEA or Switzerland to the United States; (2) is recorded in any form; (3) is about, or pertains to, a specific individual; and (4) can be linked to that individual. These terms do not include any data rendered anonymous such that individuals are not identifiable or are identifiable only with a disproportionately large expense of time, cost, or labor.

“**Sensitive Personal Information**” means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, past criminal convictions or indictments or that concerns an individual’s health.

## PRIVACY PRACTICES

### Notice

When we collect personal information from any of our business partners, clinical trial and other healthcare partners, customers, or website users, we commit to informing them about the types of data we collect about them, the purposes for which we use the data, the third parties to which we disclose the data, the choices and means that we offer for limiting their use and disclosure, and how they can contact us with any inquiries or complaints.

Notice is provided in clear and conspicuous language at the time of collection or as soon as practicable thereafter, but in any event before we use the information for a purpose other than that for which it was originally collected or processed by the transferring organization or before we disclose the information for the first time to a third party except where the third party is an agent as defined above.

Personal information covered by this policy includes:

1. Patient information
2. Customer information
3. Health Care Provider/ Clinical Trial Partner information
4. Business Partner information
5. Website User Information

Personal information will not be used for any activities such as marketing, promotion, and sale or lease to third parties without your written consent. Personal information is likewise never shared with vendors, suppliers and contractors except where necessary to support the provision of products and services we offer.

Personal information may be used by us to facilitate complaint handling/ adverse event reporting, clinical trial research, Precision Lab service activities, internal record keeping, marketing and promotion, requests for additional information, and other legal and business activities.

We may use personal information to improve the information we provide to you on our website about our products and services. We may also inform you of upcoming conferences we will be attending, our release schedule, and news stories about VIDA or send you marketing and promotional materials when you request additional information by completing our online Information Request Form and consent to receiving this information.

### **Cookies**

Our website uses cookies. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors. The information collected about you from cookies may be used by us to monitor browsing preferences. Usage of a cookie is in no way linked to any personally identifiable information on our site. Use of our website assumes consent to the use of cookies. Cookies may be disabled within your browser settings.

Our website also contains links to other sites. These links are provided for your convenience only. The inclusion of any links does not necessarily imply a recommendation or endorsement of the views expressed by those sites. Please be aware that we are not responsible for the content or privacy practices of other sites. We encourage Our users when they leave Our site to read the privacy statements of any other site you go to that collects personally identifiable information.

### **Choice**

If we wish to use your personal or sensitive information covered by this policy in a manner that is incompatible with the purposes for which it was originally collected or subsequently authorized by you—or—if we wish to disclose the information to non-agent third parties, VIDA will seek your consent (“opt in”) before transferring or using the information in this manner.

### **Onward Transfer**

If we transfer personal information to vendors, suppliers, contractors, agents or other third parties, we will obligate them to protect the information at least to the same degree mandated by applicable data privacy laws. We have entered into Data Processing Agreements for the international transfer of Personal Data collected in the European Economic Area and Switzerland with certain service providers, customers and other parties, or we rely on vendors who belong to the EU-U.S. or Swiss-U.S. Privacy Shield to transfer Personal Data to the United States.

We use MailChimp and Google Analytics, which use cookies and similar technologies to collect data such as IP addresses to distribute information to users who have subscribed to our mailing list and to evaluate use of and interaction with our website respectively. You may learn about MailChimp's privacy policy by clicking [here](#) and Google's [here](#).

If we learn that a third party is using or sharing personal information in a manner inconsistent with this policy, we will take reasonable steps to prevent or stop such use or sharing.

## Access and Data Portability

We commit to providing you with access to your personal information whenever possible. Just email us at [info@vidadiagnostics.com](mailto:info@vidadiagnostics.com) if you wish to:

1. See or obtain the data we have about you, if any
2. Change/ correct any data we have about you
3. Have us delete any data we have about you
4. Express any concern you have about our use of your data

We will honor requests to delete data whenever possible, such as when we no longer need it or your right to deletion outweighs our legitimate grounds for processing the data. Where provided by law, you may withdraw consent you previously provided to us or object at any time to the processing of your personal information on legitimate grounds relating to your particular situation, and we will apply your preferences going forward as appropriate.

Please note that providing personal information to us is voluntary on your part. If you choose not to provide us certain information, we may not be able to offer you certain products and services, facilitate access to website content in whole or in part, or provide comprehensive support.

## Security

We take precautions to protect personal data covered by this policy from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We have put in place appropriate physical, technical and managerial procedures to safeguard and secure the information from loss, misuse, unauthorized access or disclosure, alteration, or destruction both online and off. Only employees who need the information to perform a specific task such as customer billing are granted access to personally identifiable data. Likewise, the computers and servers that house this data are kept in a secure environment. Personal information is transmitted securely over the Internet using data encryption technology.

We encourage all health care professionals and other individuals who send patient studies or clinical data to VIDA for analysis to anonymize the patient information prior to transmitting it over the Internet, whenever appropriate. If patient data arrives in identifiable form—and when the information is not expressly required to remain in identifiable form—we will anonymize the data in-house.

## Retention

We will keep your personal information only as long as we need it for the purposes for which we collected it, or as permitted or required by law.

## Data Integrity

We will use your personal information only in ways that are compatible with the purposes for which it was collected and for which you consented. We will take reasonable steps to ensure that information is relevant to its intended use, accurate, complete and current.

## Policy Review

We will regularly review how we're meeting this policy and take corrective action in the event we discover we are not meeting our obligations. We also regularly verify that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and complies with relevant data protection laws.

## Amendments

This policy may change from time-to-time in a manner that remains consistent with relevant data protection laws. We will post any revised policy here and encourage you to revisit this page periodically to check for updates and ensure you are happy with them. This policy is effective beginning May 25th, 2018.

If you feel we are not abiding by this policy, have questions about our privacy practices, or wish to withdrawal consent for a particular use of your personal information or otherwise exercise your data ownership rights, contact us at:

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