

Privacy Highlights

These "privacy highlights" provide an overview of some core components of our data handling practices. Please be sure to read our full privacy statement.

1. We collect information when you register an account, self-report information through surveys, forms, features or applications, use our Services, upload your own content to our Services, use social media connections and features, refer your contacts to us, share information through various interactions with us and our partners, and via cookies and similar tracking technologies (see our Cookie Policy).
2. We use information in general (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, and customers as we reasonably believe is permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to, and (v) when you consent, for research purposes, the results of which could be used to develop therapeutics.

CONSENT TO THE USE OF SENSITIVE INFORMATION

By agreeing to our Privacy Statement and Terms of Service, you consent to sensitive information, such as information about your health, life data Information, and Self-Reported Information such as racial and ethnic origin and sexual orientation (where you provide it) being used by us to:

1. analyze and provide you with our Services;

2. analyze and provide you with information about your ancestry;
3. determine whether you would be suitable to take part in surveys, polls or questionnaires that we are conducting; and
4. monitor and improve existing products or services that we offer or to develop new products and services

We will not use your sensitive information without your consent unless: (i) the information has been anonymized or aggregated so that you cannot reasonably be identified as an individual; or (ii) a legal obligation requires us to use it in some way e.g. a court order requires us to disclose the information.

CONSENT TO THE TRANSFER OF YOUR PERSONAL INFORMATION

1. By agreeing to our Privacy Statement and Terms of Service, you consent to the storing and processing of your personal information, including sensitive information, in the USA and countries outside of the country you live in. We use a range of measures to safeguard information but these countries may have laws that are different from those of your country of residence. You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third-party or to a third-party for research purposes without your explicit consent.

3. We give you the ability to share information with other individuals. You will always need to take a positive action to share your information.
4. You may independently decide to disclose your information to friends and/or family members, doctors, health care professionals, or other individuals outside our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"); always review the privacy policies of third-party apps and services before sharing your information.
5. We may share anonymized and aggregate information with third-parties; anonymized and aggregate information is any information that has been stripped of your name and contact information and aggregated with information of others or anonymized so that you cannot reasonably be identified as an individual.
6. We will use your information and share it with third-parties for scientific research purposes only if you sign a Consent Document. Note that we will disclose your individual-level information only if we obtain additional explicit consent from you.
7. There may be some consequences of using HealthBrain Services that you haven't thought of, you should read our guide of the surprising things you may find out from using the service before submitting your personal information.

8. If you have any questions about our privacy practices, please email us at privacy@healthbrain.co.

Full Privacy Statement

This privacy statement applies to all websites owned and operated by HealthBrain, Inc ("HealthBrain"), including www.healthbrain.co. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when operating our website, mobile apps, products, software and other services (collectively "Service" or "Services").

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1. Key Definitions

1. Aggregate Information: information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. Anonymized Information: information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual.
3. Individual-level Information: information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. Personal Information: information that can be used to identify you, either alone or in combination with other information.

HealthBrain collects and stores the following types of Personal Information:

- a. Registration Information: information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
- b. Life Data from integrations.

- c. Self-Reported Information: all information about yourself, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your HealthBrain account.
 - d. Sensitive Information: information about your health, life data Information, and certain Self-Reported Information such as racial and ethnic origin and sexual orientation.
 - e. User Content: all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than life data Information and Self-Reported Information-generated by users of HealthBrain Services and transmitted, whether publicly or privately, to or through HealthBrain.
 - f. Web Behavior Information: information on how you use the HealthBrain website (e.g. browser type, domains, page views) collected through log files, cookies, and web beacon technology.
5. Service or Services: HealthBrain's products, software, services, and website (including but not limited to text, graphics, images, and other material and information) as accessed from time to time by the user, regardless if the use is in connection with an account or not.

2. Principles

The following are our core privacy principles:

1. We collect and handle information (i) to provide, analyze and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, including for marketing and advertising purposes, (iii) to protect the security and safety of our company, employees, customers, as we reasonably believe is permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to, and (v) when you consent, for research purposes, the results of which could be used to develop therapeutics.
2. We will not sell, lease, or rent your individual-level information (i.e., information about a single individual's genotypes, diseases or other traits/characteristics) to any third-party or to a third-party for research purposes without your explicit consent.
3. We understand and respect the sensitive nature of the information you may provide to us, including information about your life data, genetic characteristics, disease conditions, racial and ethnic origin, etc. To that end, we strive to be transparent in our collection, use and disclosure of this information and to ask for your explicit consent to share such sensitive information with third-parties. Please see below to learn more about our sharing and consent practices.
4. We are committed to providing a secure and safe environment for our Services.

Please review this Privacy Statement and our Terms of Service. By using our Services, you agree to all of the policies and procedures described in the foregoing documents.

4. How we use and share information

HealthBrain will use and share your personal information with third-parties only in the ways that are described in this privacy statement.

- a. Using information to provide, analyze and improve our Services
- b. We use the information to operate, provide, analyze and improve our Services. These activities may include, among other things, using your information in a manner consistent with other commitments in this privacy statement, to:
 - i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
 - ii. host our website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
 - iii. conduct analytics to improve and enhance our Services;
 - iv. offer new products or services to you, including through emails, promotions or contests;
 - v. implement online marketing campaigns and targeted advertising, including by utilizing third-party ads (subject to your cookie settings and preferences), and to measure the effectiveness of our marketing and targeted advertising;
 - vi. conduct surveys or polls, and obtain testimonials;

- vii. process and deliver your life data results;
 - viii. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.
- c. You may be able to opt-in, opt-out or otherwise adjust your preferences of having your information used for certain of these activities. Please see below to learn more.
 - d. We use mobile analytics software to allow us to better understand the functionality of our Mobile Software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.
 - e. Using information with your consent
 - f. You have the choice to participate in HealthBrain Research by providing your consent. "HealthBrain Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by HealthBrain. HealthBrain Research may be sponsored by, conducted on behalf of, or in collaboration with third-parties, such as non-profit foundations, academic institutions or pharmaceutical companies. HealthBrain Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions,

work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. HealthBrain Research uses your aggregate or individual-level life data Information and Self-Reported Information as specified in the Consent Document.

- i. Consent process for research. Your life data and Self-Reported Information may be used for HealthBrain Research only if you have consented to this use by completing a Consent Document. If you have completed a Consent Document:

1. HealthBrain may use individual-level life data Information and Self-Reported Information internally at HealthBrain for Research purposes. In addition, we may allow select third-party research contractors to access your individual level life data and/or Self-Reported Information onsite at HealthBrain's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by HealthBrain and subject to HealthBrain's access rules and guidelines.
2. When your life data Information and/or Self-Reported Information is being used for research purposes, it will not be linked to your Registration Information.

- ii. **Withdrawing your Consent.** You may withdraw your consent to participate in Research at any time by changing your consent status within your HealthBrain Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at hpa@healthbrain.co. HealthBrain will not include your life data Information or Self-Reported Information in new research occurring after 30 days from the receipt of your request. Any research involving your data that has already been performed or published prior to our receipt of your request will not be reversed, undone, or withdrawn. You may also discontinue your participation in research by closing your Personal Service account. If you withdraw your consent for research your life data Information and Self-Reported Information may still be used by us and shared with our third-party service providers to provide and improve our Services (as described in Section 4.a), and shared as Aggregate Information that does not identify you as an individual (as described in Section 4.d).
- iii. **What happens if you do NOT consent to HealthBrain Research?** If you do not complete a Consent Document or any additional consent agreement with HealthBrain, your information will not be used for HealthBrain Research. However, your life data Information and Self-Reported Information may still be used by us and

shared with our third-party service providers to provide and improve our Services (as described in Section 4.a), and shared as Aggregate or Anonymous Information that does not reasonably identify you as an individual (as described in Section 4.d).

- g. Recruiting for external research
- h. Academic institutions, healthcare organizations, and other groups are always conducting interesting new research projects. We want to make you aware of these opportunities. While we do not share individual-level life data Information or Self-Reported Information with third-parties without your consent, from time to time we may inform you of third-party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to HealthBrain members who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. If you do not wish to receive these alerts, you can manage them in your settings.
- i. Information we share with third-parties
 - i. General service providers. We share the information described above in Section 3 with our service providers, as necessary to provide their services to us. Service providers are third-parties (other companies or individuals) that help us to provide, analyze and improve our Services. For example, we work with third-party laboratories and contractors to process and

analyze your life data for purposes of generating additional life data Information.

- ii. NOTE: Our service providers act on HealthBrain's behalf. While we implement procedures and contractual terms to protect the confidentiality and security of your information, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.
- iii. When you activate an account from HealthBrain, you are instructed to connect integrations to our third-party integrations dataset. The account id unique identifies you to us but not to the laboratory. We are also required to provide to the laboratory, your sex and date of birth or age pursuant to clinical laboratory requirements such as the Clinical Laboratory Improvement Amendments (CLIA). No other Registration Information (such as your name, address, email, phone number or other contact information) is required or provided to the laboratory.
- iv. "Targeted advertising" service providers. We permit third-party advertising networks and providers to collect Web Behavior Information on our Service to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies (such as JavaScript, beacons, device identifiers, location data, and clear gifs) to compile information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps

to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns.

- v. For more information about our advertising and marketing practices, please review our Cookie Policy.
- vi. Aggregate information. We may share aggregate information with third-parties, which is any information that has been stripped of your Registration Information (e.g., your name and contact information) and aggregated with information of others so that you cannot reasonably be identified as an individual ("Aggregate Information"). This Aggregate Information is different from "individual-level" information. Individual-level life data Information or Self-Reported Information consists of data about a single individual's life data, diseases or other traits/characteristics information. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. We may provide such Aggregate Information in commercial arrangements with our business partners. In contrast, individual-level life data Information could reveal whether a specific user has a particular genetic trait, or all of the life data Information about that user. HealthBrain will ask for your consent to share individual-level life data Information or Self-Reported

Information with any third-party, other than our service providers as necessary for us to provide the Services to you.

vii. Information we share with commonly owned entities.

We may share some or all of your information with other companies under common ownership or control of HealthBrain, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. We may provide additional notice and ask for your consent if we wish to share your information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

j. Disclosures required by law

k. Under certain circumstances your information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. HealthBrain will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that HealthBrain may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the HealthBrain

Terms of Service and other policies; (c) respond to claims that any content violates the rights of third-parties; or (d) protect the rights, property, or personal safety of HealthBrain, its employees, its users, its clients, and the public.

- I. NOTE: If you are participating in HealthBrain Research, HealthBrain will withhold disclosure of your personal information involved in such research in response to judicial or other government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that HealthBrain has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk (<http://grants.nih.gov/grants/policy/coc/index.htm>).

5. Your choices

- a. Access to your account
- b. If your Registration Information changes, you may access, correct or update most of it from your Account Settings page. You may also modify and delete certain of your information, or update your consent status and biobanking options. You may be able to correct or reset Self-Reported Information entered into a survey, form, or feature from your account on the surveys page. Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third-parties, though we can work with you to prohibit your data from being shared with third-parties in the future. We will respond to your request to access within 30 days.
- c. Upon request HealthBrain will provide you with information about whether we hold, or process on behalf of a third party, any of your personal

information. To request this information please contact us at privacy@healthbrain.co.

d. Marketing communications

e. By registering for an account, you are agreeing that we may send you promotional emails about our Services. You can opt-out of receiving certain messages or notifications from us by visiting your Account page (go to Account, Settings, Notifications) or by contacting our Privacy Administrator at privacy@healthbrain.co. You can also click the "unsubscribe" button at the bottom of promotional email communications. Please note that you may not opt-out of receiving non-promotional messages regarding your account, such as technical notices, purchase confirmations, or Service-related emails.

f. For more information about our online advertising, please also refer to Section 4.d.ii above under the heading "Targeted Advertising Service Providers", and also refer to our Cookie Policy.

g. Information you choose to share with others

h. HealthBrain gives you the ability to share information with other individuals who have HealthBrain accounts through (i) our profile sharing, (ii) public profiles, and (iii) other sharing features (such information is "User Content"). Please refer to your settings. You may be required to opt-in to some of this sharing, but some features require an opt-out. You may decide to disclose your personal information to friends and/or family members, doctors or other health care professionals, and/or other individuals outside of our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"). These third-parties may use your personal information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third-parties involved in the

transaction. For example, if you have enabled a HealthBrain sharing feature with another person who downloads a third-party app that uses our API, your information may also be obtained by that third-party app developer and, potentially, by other users of that third-party app.

- i. In general, personal information, once shared or disclosed, can be difficult to contain or retrieve. HealthBrain will have no responsibility or liability for any consequences that may result because you have released or shared personal information with others. Likewise, if you are reading this because you have access to the personal information of a HealthBrain customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. It is incumbent upon all users to share personal information and account access only with people they know and trust. Users with multi-profile accounts (e.g., where family member accounts are linked) should use caution in setting profile-level privacy settings.
- j. Account closure
- k. If you no longer wish to participate in our Services or no longer wish to have your personal information be used, you may close your account by sending a request to [Customer Care](#).

6. Important Information

- a. Privacy Shield
- b. HealthBrain participates in and has volunteered its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. HealthBrain is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield

Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit U.S. Department of Commerce's Privacy Shield List.

- c. HealthBrain is responsible for the processing of personal data it receives, under the Privacy Shield Frameworks, and subsequently transfers to a third party acting as an agent on its behalf. HealthBrain complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.
- d. With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, HealthBrain is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, HealthBrain may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- e. In compliance with the EU-US and Swiss-US Privacy Shield Principles, HealthBrain commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Privacy Statement should first contact HealthBrain's Privacy Administrator.
- f. HealthBrain has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a complaint.

- g. Finally, as a last resort and under limited circumstances, EU and Swiss individuals with residual privacy complaints may invoke a binding arbitration option before the Privacy Shield Panel.
- h. Security measures
 - i. HealthBrain takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, HealthBrain uses a range of physical, technical, and administrative measures to safeguard your Personal Information. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology when we go to production.
 - j. Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third-party and should immediately notify HealthBrain of any unauthorized use of your password. HealthBrain cannot secure Personal Information that you release on your own or that you request us to release.
 - k. Your information collected through the Service may be stored and processed in the United States or any other country in which HealthBrain or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.
- l. Business transactions
 - m. In the event that HealthBrain goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In

such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

n. **Linked websites**

o. HealthBrain provides links to third-party websites operated by organizations not affiliated with HealthBrain. HealthBrain does not disclose your information to organizations operating such linked third-party websites. HealthBrain does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by HealthBrain.

p. **Children's privacy**

q. HealthBrain is committed to protecting the privacy of children as well as adults. Neither HealthBrain nor any of its Services are designed for, intended to attract, or directed toward children under the age of 13. A parent or guardian, however, may collect life data from, create an account for, and provide information related to, his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to HealthBrain about his or her child is kept secure and that the information submitted is accurate.

r. **Changes to this Privacy Statement**

s. Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for 30 days. After 30 days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective.

7. Contact Information

If you have questions about this Privacy Statement, please email HealthBrain's Privacy Administrator at privacy@healthbrain.co