

## Privacy Statement

### 1. **Introduction**

- 1.1 The Genebox website (the "**Website**") is operated by Genebox Limited, a company registered in Ireland under company registration number is 578870 ("**we**", "**our**", "**us**" or "**Genebox**").
- 1.2 Your data will always be yours to control. Respect for your right to privacy and your ability to decide what is done with your data are fundamental to us. This Privacy Statement sets out exactly what we do when we have your permission. We will only make use of your data for purposes requested by you and always with your consent. Without the need to provide any reason and at any time, you may direct us to delete your data that you have asked us to store for you, including any genetic data which we hold on your behalf.
- 1.3 Genebox will be the company (known as a "data controller") which collects and controls how your data are stored, used, amended, deleted and otherwise processed. We have legal obligations, including those under applicable European data protection law, in respect of our role as data controller which we take very seriously.
- 1.4 In this Privacy Statement, we outline our policies and practices regarding the processing, collection, use and disclosure of any information you submit to us through the Website or by using our genetic sequencing, analytics and storage services (the "**Services**").
- 1.5 You are deemed to accept the terms of this Privacy Statement by using the Website or ordering the Services from us and you should review this each time you use the Website to satisfy yourself that it is acceptable to you. If you have any query, you can contact us at [help@genebox.me](mailto:help@genebox.me). If you do not agree with any aspect of this Privacy Statement, you should stop using the Website and should not purchase any of our services.
- 1.6 In order to fully understand your rights, we encourage you to read this Privacy Statement.
- 1.7 Please note that you must be at least 18 years old to use the Website.

### 2. **What we collect and Why we collect it**

There is certain information relating to you that we must obtain in order to provide the services you request. A list of the type of information we collect and the purposes for which we use this information is set out below in Section A (General Data) and Section B (Genetic Data).

#### **A. GENERAL DATA**

##### 2.1 **General information collected:**

- (a) contact information that you provide to us when registering your interest or ordering services from us such as your name, address, e-mail address and any passwords of your choice;
- (b) payment information that you provide when purchasing our Services (including credit/debit card details);
- (c) information provided at the time of registering to use the Website (including your preferences for the types of communications you wish to receive from us);
- (d) a record of any correspondence between you and Genebox;
- (e) your responses to any forms or surveys that we may, from time to time, ask you to complete (although please note that you do not have to respond to them);
- (f) information necessary for providing you with the service such as age, gender and ethnicity
- (g) (at your option) information about your medical history.

##### 2.2 **What we do with Your information:**

- (a) respond to any queries you submit to us and process any requests we receive from you;
- (b) send you updates and information which you have asked for or which we expect may be of interest to you, where you have consented to be contacted for such purposes;
- (c) provide you with any service that you may purchase from us;
- (d) when permitted by you, provide you with information about our offerings or the offerings of our partners;
- (e) seek your views on our services and possible future offerings;
- (f) inform you about any changes to our services;
- (g) fulfil any contractual obligations formed between you and us; and
- (h) to analyse your sequenced genetic data in light of the information which you provide in order to provide you with a more customised report.

## **B. GENETIC DATA**

### **2.3 Genetic information collected:**

- (a) upon purchasing our genetic sequencing, analysis and storage services, you will provide your DNA sample using a saliva testing kit that we send to you, which we send to a carefully selected and approved laboratory;
- (b) your DNA sample will then be extracted and sequenced in the laboratory. If you wish to know more about this process, please refer to our brochure;
- (c) the sequenced genetic data will then be transferred to the Genebox Database for analysis; and

### **2.4 What we do with this information:**

- (a) provide you with any services that you purchase from us including the sequencing and analysis of your genetic data;
- (b) store your genetic data in a secure repository;
- (c) allow you easily to participate in any offerings by our partners if and only when you choose to do so; and
- (d) if you instruct us to do so, we may re-analyse your genetic data at a future stage to avail of any scientific advancements;
- (e) occasionally we may use your data for internal testing aimed at improving the services we provide to you.

### **2.5 What we never do:**

- (a) we never retain a copy of your DNA sample and we never permit our testing laboratory to do so;
- (b) we never permit our testing laboratory to retain a copy of your genetic data. Once the laboratory has successfully transferred the data to the Genebox Database, it has an obligation without delay to delete any copies of your genetic data which it may hold;
- (c) we do not share a copy of your report with any third party except where you direct us to do so;

- (d) we never disclose your information to any third party except: (i) to our third party partners who require the information in order to provide the services to you (please see section 3 below for more information); or (ii) third parties permitted by you.

### **3. Disclosure of information to third parties**

- 3.1 We may disclose your personal information to approved third parties working on our behalf in order to provide you with the services. For example, if you purchase certain services from us such as DNA sequencing, analytics and storage, we will use a third party company to process your payment for these services, send you the DNA testing kits and then send your DNA sample to approved laboratories for extraction, sequencing and analysis.
- 3.2 If you would like to see a list of our third party partners, please contact us at [help@genebox.me](mailto:help@genebox.me).
- 3.3 Except as set out in section 3.1 above, we will not disclose your personal information or genetic data to any third party without your explicit instruction and consent. When we disclose your genetic data to a third party in this way neither this Privacy Statement nor our Terms and Conditions will apply to the third party's use of the genetic data.
- 3.4 We may disclose your personal information if we believe in good faith that we are required to disclose it in order to comply with applicable law.
- 3.5 We will never agree to transfer information (including your personal data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company unless that other party agrees to adhere to the terms of this Privacy Statement and provided that other party agrees to use your personally identifiable information only for the purposes permitted by you. We will inform you if this situation arises. We remind you that you always retain the option to have your data deleted at any time.

### **4. Opting out**

We will always give you the opportunity to opt-out (or unsubscribe) from any marketing or promotional emails that occasionally we may send. You may change your contact preferences at any time and this option is provided in each e-mail you receive or can be done by contacting us directly at [help@genebox.me](mailto:help@genebox.me). If you opt out of all voluntary email notifications, we reserve the right to notify you where necessary or appropriate to provide services requested by you or in relation to your account.

### **5. Processing & Storage of your personal data: Security**

- 5.1 Your DNA will be sent to our partner laboratories for testing. Some of these laboratories will be based outside of the EEA. The sequenced and analysed data together with any medical information which you provide will be transferred to, and stored within the EU. Except as set out in this Privacy Statement, we will not transfer your data outside the European Economic Area (EEA) or allow third parties located outside the EEA to access your data unless you have entered into a contract with one of our third party partners that permits this. Please be aware that jurisdictions outside of the EEA may not offer the same level of protection.
- 5.2 We will take all steps reasonably necessary to ensure that your data are treated securely and in accordance with this Privacy Statement.
- 5.3 The Genebox Database is hosted on a server which is ISO 27001 certified in order to ensure that your genetic data is kept secure at all times.
- 5.4 Where we have given you (or where you have chosen) a password or username that enables you to access certain parts of the Website, you are responsible for keeping this password or username confidential. You must not share this information with anyone. You should not use the same password that you use for other online services or otherwise.

### **6. Marketing**

You have the right to ask us not to process your personal data for marketing purposes. We will inform you if we would like to use your data for such purposes. You can exercise your right to stop any processing that you previously permitted by emailing us at [help@genebox.me](mailto:help@genebox.me).

**7. Your Rights - accessing, updating, verifying and deleting personally identifiable information**

You have the right (i) to know what data we hold about you and for what purpose we hold such data, (ii) to object to the use of your data if it is causing you damage or distress, (iii) to block any specific uses of your data, and (iv) to notify us of any changes in your personally identifiable information, and, in accordance with our obligations under the Acts, we will update or delete your personally identifiable information accordingly.

You also have the right to access information held about you. Any access request may be subject to a prescribed fee which currently does not exceed €6.35.

To exercise any of these rights, please email us at [help@genebox.me](mailto:help@genebox.me) clearly stating your request.

**8. Changes to this Privacy Notice**

We may amend this Privacy Statement on occasion, in whole or part, at our sole discretion. If at any time we decide to use personally identifiable information in a manner significantly different from that previously stated in our Privacy Statement, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner. Continued use of our Services following notice of any such changes shall indicate your acceptance of such changes and agreement to be bound by the terms and conditions of such changes.

**9. Contact**

Questions, comments and requests regarding this Privacy Statement are welcomed and should be addressed to [help@genebox.me](mailto:help@genebox.me).