

Privacy Policy

This Privacy Statement applies to www.kailosgenetics.com owned and operated by Kailos Genetics, Inc. 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”). The following are our core privacy principles:

- We collect and handle information to provide, analyze and improve our Services, as we reasonably believe is permitted by laws and regulations, such as for marketing and advertising purposes, and as reasonably necessary to comply with laws and regulations, and to protect the security and safety of our company, employees, customers and others.
- We will not sell, lease, or rent your individually identifiable 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.
- We understand and respect the sensitive nature of the information you may provide to us, including information about your 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.
- 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 on the Kailos Genetics website. Kailos Genetics, Inc. is headquartered at 601 Genome Way, Huntsville, AL 35806 and is referred to herein as Kailos Genetics (or “we,” “us,” “our”) and includes all of our commonly owned companies.

What information we collect:

- **Information you provide directly to us**
 - Registration information. When you register an account with us or purchase our Services, we collect personal information, such as your name, billing, and shipping address, payment information (e.g., credit card), and contact information such as your email and phone number.
 - Self-reported information. You have the option to provide us with additional information about yourself through surveys, forms, features, or applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g. pulse rate, cholesterol levels, visual acuity), and family history information (e.g. information similar to the foregoing about your family members). Where you are disclosing information about a family member, you should make sure that you have

- permission from the family member to do so.
- User content. Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission (“User Content”).
 - Social media features and widgets. Our website includes Social Media Features, such as the Facebook ‘Like’ or ‘Share’ button and Widgets, and the LinkedIn Open ID application (“Features”). These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. For example, if you use LinkedIn to sign in to our career portal, LinkedIn may import personal information from your LinkedIn profile in order to populate your job application. The data we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.
 - Testimonials. We may post customer testimonials either on our website or in other online or offline formats. Customer testimonials may contain personal information and it is our policy to request consent from customers in advance of using testimonials. If you wish to update or delete your testimonial, you can contact us at privacy@kailosgenetics.com. Following updating or deletion of your testimonial, we cannot be responsible for disclosures made prior to your requests and for third parties’ uses that have been authorized by you.
 - Referral information and sharing. When you refer a person to Kailos Genetics or choose to share results information with another person, we will ask for that person’s email address. We will use the email address solely, as applicable, to make the referral or to share your results information, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for Kailos Genetics to communicate (e.g., via email) with him or her.
 - Address books. If you choose to use your computer’s or mobile device’s address book in connection with our Services to make referrals or to request that we communicate with another person, we may collect the names and contact information of those persons for these purposes only.
 - Third-party services (e.g., social media). If you use a third-party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person’s name and contact information, we may also collect other information (e.g., your

profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third-party site. We do not control third-party site's information practices, so please review their privacy policies and your settings on those sites carefully.

- Gifts. If you provide us personal information about others, or if others give us your information for purposes of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our Privacy Statement, our Terms of Service, and if applicable, Consent Document, his or her information will be used consistent with this Privacy Statement and those agreements, and we will not share any of the gift recipient's personal information with the user who purchased the gift.
- Customer service. When you contact our Customer Service center or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service, Privacy Statement or applicable laws or regulations; and analyze and improve our Services.
- **Information related to our genetic testing services**
 - Personal genetic samples and bio-banking. To use our genetic testing services, you must purchase, or receive as a gift, a Kailos Genetics testing kit, register an online account, and ship your personal genetic sample to our laboratory. Once received, your personal genetic sample will be identified by its unique barcode, along with your gender and your date of birth. Unless you choose to store your sample with Kailos Genetics (called "bio-banking"), your personal genetic sample(s) and DNA can be destroyed, at your request, after the laboratory completes its work, unless the laboratory's legal and regulatory requirements require it to maintain physical samples. Bio-banked samples are maintained solely for the purpose of improving and validating assay performance and are accessible only to Kailos Genetics employees.
 - Genetic information. Genetic Information refers to features of your DNA that distinguish you from other people (e.g. the As, Ts, Cs, and Gs at particular locations in your genome) and is generated when we analyze and process your buccal swab sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the Kailos Genetics genotype reports provided to you as part of our Services, and may be used for other purposes, as outlined below.
- **Information collected through tracking technology** (e.g. from cookies and similar technologies)
 - Web behavior information. We and our third party partners use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to help us recognize you, customize and improve your experience, provide security, analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service), gather demographic information about our user base, to offer our products and services to you, to monitor the success of marketing programs,

and to serve targeted advertising on our site and on other sites around the Internet. We and our third party partners do not use your Genetic Information and Self-Reported Information, for targeted advertising. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

- As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you, such as your user profile ID or order number. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.
- **Other Types of Information**
 - We are always working to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our privacy statement, as needed.

How we use and share information

Kailos Genetics will use and share your personal information with third parties only in the ways that are described in this Privacy Statement, and the Terms of Service, including, but not limited to:

- Using information to provide, analyze, and improve our Services.
- We use the information described above in 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:
 - open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);
 - host our website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
 - conduct analytics to improve and enhance our Services;
 - offer new products or services to you, including through emails, promotions, or contests;
 - 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;
 - conduct surveys or polls, and obtain testimonials;
 - process and deliver your genetic testing results; and
 - 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.

- 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.
- You may decide to disclose your personal information to friends and/or family members, doctors or other healthcare professionals, and/or other individuals outside of our Services, including through third-party services such as social networks. These third parties may use your personal information differently than we do under this Privacy Statement, and we may not have any control over such uses. Please make such choices carefully and review the privacy policies of all other third parties involved in the transaction.
- In general, personal information, once shared or disclosed, can be difficult to contain or retrieve. Kailos Genetics 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 Kailos Genetics 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. Kailos Genetics will have no responsibility or liability for any consequences that may result because you have shared information through a multi-profile account.
- Information we share with third parties
 - General service providers. We share the information described above in 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.
 - NOTE: Our service providers act on Kailos Genetics' 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.
 - 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 Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, 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 Genetic Information could reveal whether a specific user has a particular genetic trait, or all of the Genetic Information about that user. Kailos Genetics will ask for your consent to share individual-level Genetic Information or Self-Reported Information with any third party, as necessary for us to provide the Services to you.

- 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 Kailos Genetics, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent. 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.
- Information we share with third parties with your consent
 - Kailos Genetics conducts research and works with public, private, and government partnerships to develop research and advance genetic understanding. With your consent, Kailos Genetics may share aggregate or individual-level Genetic Information, Self-Reported Information, and Web Behavior Information with other parties for various purposes.
 - “Kailos Genetics Research” refers to scientific research conducted by Kailos Genetics or by third parties in collaboration with Kailos Genetics with the goal of advancing genetic knowledge and to create, commercialize, and apply this new knowledge to the improvement of health care. Kailos Genetics Research may study a specific group or population and may build upon existing scientific knowledge. At times, this research is conducted with the intent to publish findings in a peer-reviewed scientific journal, and may be funded by the federal government. Kailos Genetics Research involves the use and analysis of aggregate or individual-level Genetic Information, Self-Reported Information and Web Behavior Information as specified in the Consent Document.
 - Consent process for Kailos Genetics Research. Your Genetic, Self-Reported and Web Behavior Information may be used for Kailos Genetics Research only if you have consented to this use by completing a Consent Document. If you have completed a Consent Document:
 - Kailos Genetics may use individual-level Genetic Information, Self-Reported Information and Web Behavior Information internally at Kailos Genetics for research purposes. Kailos Genetics may use this information to publish the results of the research in peer-reviewed scientific journals. In addition, we may allow select third party research contractors to access your individual level Genetic and/or Self-Reported Information onsite at Kailos Genetics’s offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by Kailos Genetics and subject to Kailos Genetics’s access rules and guidelines.
 - When your Genetic Information, Self-Reported Information and/or

Web Behavior Information is being used for research purposes (whether internally by Kailos Genetics researchers, shared in aggregate or individual-level form with third parties, or used by third party researchers onsite at Kailos Genetics), it will never be combined with your Registration Information.

- Withdrawing your Consent. You may withdraw your consent to participate in Kailos Genetics Research at any time by changing your consent status on your Kailos Genetics Account Settings page. Kailos Genetics will not include your Genetic Information, Self-Reported Information or Web Behavior Information in new Kailos Genetics 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 Kailos Genetics Research by closing your account. If you withdraw your consent for Kailos Genetics Research your Genetic 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 above), and shared as Aggregate Information that does not identify you as an individual (as described above).
- What happens if you do NOT consent to Kailos Genetics Research? If you do not complete a Consent Document or any additional consent agreement with Kailos Genetics, your information will not be shared or used for Kailos Genetics Research. However, your Genetic 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 above), and shared as Aggregate Information that does not identify you as an individual (as described above).
- **Disclosures required by law**
 - 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. Kailos Genetics 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 Kailos Genetics may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the Kailos Genetics 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 Kailos Genetics, its employees, its users, its clients, and the public.

Your choices

- **Access to your account**
 - 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 portions 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. If the feature does not enable you to correct or reset information, you may do so by contacting Customer Care. 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 business days.

- **Marketing communications**

- 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@KailosGenetics.com. 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 confirmation, or Service-related emails.

- **Account closure**

- 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. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) business days of our receipt of your request. As stated in any applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in Kailos Genetics Research cannot be removed from ongoing or completed studies that use the information. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) as long as your account is active or as needed to provide you services, as well as for accounting, audit, and compliance purposes.

Important Information

- **Security measures**

- Kailos Genetics 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, Kailos Genetics 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.
- 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 Kailos Genetics of any unauthorized use of your password. Kailos Genetics cannot secure Personal Information that you release on your own or that you request us to release.

- Your information collected through the Service may be stored and processed in the United States or any other country in which Kailos Genetics 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.
- **Business transactions**
 - In the event that Kailos Genetics 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.
- **Linked websites**
 - Kailos Genetics provides links to third-party websites operated by organizations not affiliated with Kailos Genetics. Kailos Genetics does not disclose your information to organizations operating such linked third-party websites. Kailos Genetics 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 Kailos Genetics.
- **Children's privacy**
 - Kailos Genetics is committed to protecting the privacy of children as well as adults. Neither Kailos Genetics 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 a buccal swab sample 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 Kailos Genetics about his or her child is kept secure and that the information submitted is accurate.
- **Changes to this Privacy Statement**
 - 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 10 business days. After 10 business days the changes will become effective.

Reviewed 2/11/2020