

ADD YOUR LABS PRIVACY POLICY

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Thank you for choosing to be part of our community at Adamo Diagnostics, LLC, doing business as Add Your Labs (“Add Your Labs”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at support@addyourlabs.io.

When you visit our website <https://www.addyourlabs.io>, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website (such as <https://www.addyourlabs.io>), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “Services”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us such as name, address, contact information, passwords and security data, payment information, and social media login data.

We collect personal information that you voluntarily provide to us when registering at the Services expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use. The personal information we collect can include the following:

Publicly Available Personal Information. We collect first name, maiden name, last name, and nickname; ID; email addresses; phone numbers; business phone number; business email; current and former address; family member names and their related information; social media; and other similar data.

Personal Information Provided by You. We collect data about health, DNA, medical records, FitBit, and similar apps; data held by a hospital or doctor; data collected from surveys; financial information (credit card number, purchase history, invoices); and other similar data.

Credentials. We collect passwords, password hints, and similar security information used for authentication and account access.

Payment Data. We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Stripe. You may find their privacy policy link(s) here: <https://stripe.com/privacy>.

Social Media Login Data. We provide you with the option to register using social media account details, like your Facebook, Twitter or other social media account. If you choose to register in this way, we will collect the Information described in the section called “HOW DO WE HANDLE YOUR SOCIAL LOGINS” below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information — such as IP address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Online Identifiers. We collect applications; tools and protocols, such as IP (Internet Protocol) addresses; cookie identifiers, or others such as the ones used for analytics and marketing; device’s geolocation; Radio Frequency Identification (RFID) tags; devices; and other similar data.

2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your

consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To provide our Services.** We process Personal Information in order to provide our Service, which includes processing payments, shipping kits to customers, creating customer accounts and authenticating logins, analyzing customer samples, and delivering results and powering tools.
- **To facilitate account creation and logon process.** If you choose to link your account with us to a third party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed “HOW DO WE HANDLE YOUR SOCIAL LOGINS” for further information.
- **To analyze and improve our Services.** We constantly work to improve and provide new reports, tools, and Services. We may also need to fix bugs or issues, analyze the use of our website to improve the customer experience or assess our marketing campaigns.
- **To send you marketing and promotional communications.** We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the “WHAT ARE YOUR PRIVACY RIGHTS” below).
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **Fulfill and manage your orders.** We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- **To post testimonials.** We post testimonials on our Services that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at support@addyourlabs.io and be sure to include your name, testimonial location, and contact information.
- **Deliver targeted advertising to you.** We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- **Request Feedback.** We may use your information to request feedback and to contact you about your use of our Services.
- **To protect our Services.** We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and Contractual.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To deliver services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: *We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data about how you interact with the Services over time. This information may be

used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit the Services. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

4. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In Short: If you choose to register or log in to our services using a social media account, we may have access to certain information about you.

Our Services offer you the ability to register and login using your third party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile Information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public.

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

In Short: We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.

The Services may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and

security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than _____.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age without the consent of a parent or legal guardian.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at SUPPORT@ADDYOURLABS.IO.

Add Your Labs is committed to protecting the privacy of children as well as adults. Neither Add Your Labs nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a sample from, create an account for, and provide information related to, his or her child who is under the age of 18. The parent or guardian assumes full responsibility for ensuring that the information that he/she

provides to Add Your Labs about his or her child is kept secure and that the information submitted is accurate.

9. Control Your Choices

You have the ability to make decisions about how your data is shared and used. You choose:

- To store or discard your sample after it has been analyzed.
- Which report(s) you view and/or opt-in to view.
- When and with whom you share your information, including friends, family members, health care professionals, or others outside our Services, including through third party services that accept Add Your Labs data and social networks.
- To give or decline consent for Add Your Labs Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in an Add Your Labs Research Community you can consent to the use of your de-identified data for scientific research purposes.
- To delete your Add Your Labs account and data, at any time.

a. Access to your account

We provide access to your Add Your Labs data within your Add Your Labs account. You can access and download data processed by Add Your Labs within your Add Your Labs Account Settings and within applicable Reports, Tools, and features. If you lose access to your Add Your Labs account or account email address, please contact Customer Care for assistance. If you lose access to your Add Your Labs account, in certain circumstances, we may require that you submit additional information sufficient to verify your identity before providing access or otherwise releasing information to you. If you choose not to submit the required documentation, or the information provided is not sufficient for the purposes sought, Add Your Labs will not be able to sufficiently verify your identity in order to complete your request.

You may access, correct or update most of your Registration Information on your own within your Add Your Labs Account Settings. You may be able to correct Self-Reported Information entered into a survey, form, or feature within your account, such as on the surveys page, by clicking "Edit your answers here." 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.

b. Marketing communications

You may be asked to opt-in to receive product and promotional emails or notifications when creating your Add Your Labs account or when using our Services. You may view or update your notification preferences for marketing communications by visiting your Add Your Labs Account Settings, opting out at the browser or device level, or by contacting our Privacy Administrator at support@addyourlabs.io. You can also click the "unsubscribe" button at the bottom of promotional email communications, as applicable.

c. Sharing outside of the Add Your Labs Services

You may decide to share your Personal Information with 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 statements of all other third parties involved in the transaction. Add Your Labs does not endorse or sponsor any API applications, and does not affirm the accuracy or validity of any interpretations made by third party API applications.

In general, it can be difficult to contain or retrieve Personal Information once it has been shared or disclosed. Add Your Labs 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 Add Your Labs customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of each person within that account. Users with multi-profile accounts (i.e., where multiple family members register their kits to one account) should use caution in setting profile-level privacy settings.

d. Account deletion

If you no longer wish to participate in our Services, or no longer wish to have your Personal Information be processed, you may delete your Add Your Labs account and Personal Information within your Add Your Labs Account Settings. Once you submit your request, we will send an email to the email address linked to your Add Your Labs account detailing our account deletion policy and requesting that you confirm your deletion request. Once you confirm your request to delete your account and data, your account will no longer be accessible while we process your request. Once you confirm your request, this process cannot be cancelled, undone, withdrawn, or reversed. When your account is deleted, all associated Personal Information is deleted and any stored samples are discarded, subject to the following limitations:

Legal Retention Requirements. Add Your Labs and/or our contracted laboratory will retain your Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA), California Business and Professions Code Section 1265 and College of American Pathologists (CAP) accreditation requirements. Add Your Labs will also retain limited information related to your account and data deletion request, including but not limited to, your email address, account deletion request identifier, communications related to inquiries or complaints and legal agreements for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

10. ACCESS TO YOUR INFORMATION

Your Personal Information may be shared in the following ways:

- With our service providers, as necessary for them to provide their services to us.
- With qualified research collaborators, only if you provide your explicit consent.

Add Your Labs will not sell, lease, or rent your individual-level information to a third party for research purposes without your explicit consent.

- **We will not** share your data with any public databases.
- **We will not** provide any person's data (genetic or non-genetic) to an insurance company or employer.
- **We will not** provide information to law enforcement or regulatory authorities unless required by law to comply with a valid court order, subpoena, or search warrant for genetic or Personal Information.

11. HOW WE SECURE YOUR INFORMATION

Add Your Labs implements measures and systems to ensure confidentiality, integrity, and availability of Add Your Labs data. Our team regularly reviews and improves our security practices to help ensure the integrity of our systems and your information. These practices include, but are not limited to, the following areas:

- **Independent security certification and audit.** Our information security management system, which protects Add Your Labs information assets supporting our Services, has been certified under the internationally recognized ISO/IEC 27001:2013 standard. Some of those controls are described below.
- **Encryption.** Add Your Labs uses industry standard security measures to encrypt Sensitive Information both when it is stored and when it is being transmitted.
- **Limited access to essential personnel.** We limit access of information to authorized personnel, based on job function and role. Add Your Labs access controls include multi-factor authentication, single sign-on, and a strict least-privileged authorization policy.

12. RISKS AND CONSIDERATIONS

There may be some consequences of using our Services that you haven't considered.

- You may discover things about yourself and/or your family members that may be upsetting or cause anxiety and that you may not have the ability to control or change.
- You may discover relatives who were previously unknown to you, or may learn that someone you thought you were related to is not your biological relative.
- In the event of a data breach it is possible that your data could be associated with your identity, which could be used against your interests.