PRIVACY POLICY

Freenome, Inc. is a U.S. company and we are committed to protecting your privacy. We comply with U.S. and EU laws in handling any personal information and protected health information. Personal Information provided to us will be transferred to, used and maintained by us in the U.S.

This Privacy Policy describes the practices and guidelines that we follow to help ensure the confidentiality and security of your personal information when you use our websites located at www.freenome.com, any Freenome portal, mobile applications, and any websites or services that reference this Privacy Policy, (the “Websites” or “Services”).

If you live in the U.S., please read our Notice of Privacy Practices for US Residents Under HIPAA. If you live in the EU or Switzerland, please read our Notice of Privacy Practices for EU and Swiss Residents under GDPR. Both of these documents are available on Freenome’s websites.

Some important upfront information for you:

### Important Definitions

Throughout this Policy, we will use the following terms:

**HIPAA.** The U.S. Health Insurance Portability and Accountability Act of 1996. This law provides privacy protection for protected health information.

**Protected Health Information (PHI).** Personal information which can identify a person and is related to past, present or future health conditions, treatments and payments.

**GDPR.** The E.U. General Data Protection Regulation of 2018. This law protects the privacy of personally identifiable information and restricts its use outside of the European Union.

**Personally Identifiable Information (PII).** Personal data that can identify an individual and sensitive personal information related to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person’s sex life or sexual orientation.

**Personal Information.** When we refer to PII and PHI collectively.

### Security of Your Personal Information

Freenome takes reasonable and appropriate security precautions to protect PII and PHI in its possession from loss, misuse, unauthorized access, disclosure, alteration and destruction.

We are implementing state-of-the-art physical, administrative and technical safeguards to protect the confidentiality, integrity and availability of personal data residing on, processed by or transmitted by our servers. These safeguards include, among other things, facility and data access control, complex password protection, encryption of data, security monitoring tools and protocols and the appointment of a Security Officer, a Privacy Officer and a Data Protection Officer who oversee and manage privacy and security.

It is important for you to remember that, despite all our security efforts and using industry-recommended practices, it is never possible to completely guarantee against breaches in security.
Information We Collect

Freenome may collect, store, and use PII (such as your name, address, telephone number, and email address) and PHI (such as your diagnosis, treatment information, and payment information) when you voluntarily submit it to us. You may provide this information to us or it may come from your doctors or other healthcare providers when a test is ordered for you. If you live outside the U.S., your information may come to us through distributors who are controllers of the data and provide it to us for healthcare purposes. In these situations, we are processors of personal data. As a “processor”, we do not control the data that comes to us, but rather use it to perform our healthcare services.

We may automatically collect information about you and your computing device when you use, browse, and interact with our Websites. Our Websites and Services collect this information in a variety of ways, including when you view a webpage, click on a link, access our mobile application, or enter data in an online form.

Freenome’s Use of Your Personal Information

Freenome will only use your PII and PHI for the purpose for which it was collected -- which means that what we collect we need in order to fully perform our Services or to respond to you. We may use your Personal Information to contact you, to provide information to your doctors, to obtain payment for our services, to respond to your inquiries and requests and to respond to inquiries and requests from your doctors. We only collect the Personal Information that we need to perform our healthcare services, and we obtain the minimum amount necessary for our business purposes.

We may also use your Personal Information to provide you with customer support and to maintain and improve our Services. We may combine your Personal Information with other information about you that is available to us, including information from other sources such as from your doctors, in order to maintain an accurate medical record of patients who receive our testing services.

De-identified (removing identifying information), pseudonymized (replacing identifying information with numbers so that a key is needed to re-identify) and anonymized (irreversibly removing identifying information) data may be used for scientific research purposes related to the purpose for which we originally obtained your data. Our research is conducted for the purposes of improving and developing our cancer diagnostic products. Research data is non-personally identifiable information, so no PHI or PII is used for research purposes.

Sharing Your Personal Information

Freenome may share your Personal Information with you, your healthcare providers and doctors, individuals who you have authorized to receive it and as described in this Privacy Policy. Freenome will not sell or rent your Personal Information to any other company, individual or organization.

We may occasionally hire third-party service providers to provide limited services on our behalf, such as our billing vendor, cloud service providers and auditors. Freenome will give these service providers only the Personal Information they require to perform the contracted-for services, and we require such providers to agree to contractual terms to maintain the confidentiality of the information they receive.

We may need to access or disclose your PII or PHI to comply with the law or legal process and to exercise our legal rights or defend against legal claims. We may share Personal Information and any additional information available to us in order to investigate, prevent or take action regarding illegal activities, suspected fraud, or as otherwise required by law, such as for public safety purposes. We do not use Personal Information for profiling or other automated decision purposes.
Cookies

Certain elements of our Services and/or html email correspondence may use session cookies, persistent cookies or web beacons to anonymously track unique visitors, save website preferences, and to allow us to recognize visits from the same computer and browser. You have the option to reject some or all Website cookies on your computer and still use the Services. If you choose to reject all cookies, your access to the Websites may be limited.

Aggregate Data Collection

Freenome tracks visits to our Websites using visitor logs and tracking-codes to compile anonymous aggregate statistics. This aggregate information is collected service-wide, and includes anonymous website, application, and device statistics. When you browse our Websites and access our applications our system automatically collects information such as your web request, Internet Protocol (“IP”) address, browser type, browser language, domain names, referring and exit pages, Uniform Resource Locator (URL), platform type, location, unique device identifier, pages viewed and the order of these page views, the amount of time spent on particular pages, the date and time of your request and one or more cookies that may uniquely identify your browser.

When you access our Websites through a mobile device, we may receive or collect and store unique identification numbers associated with your device or our mobile application (including, for example a Unique ID for Advertisers (“IDFA”), Google Ad ID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data or similar information regarding the location of your mobile device.

Third-Party Services Related to Customized Messages

Freenome uses certain third-party services and analytics providers to send you customized notifications (if you have provided us your email address), analyze trends, administer the Services, improve the design of our Services, and otherwise enhance, monitor, and troubleshoot the Services we provide.

Freenome does not transmit PHI or PII to these third-party service providers and we do not directly display advertisements in our applications or services.

Linked Sites

Freenome may provide links to websites operated by third parties that are not covered by this Policy. Freenome does not maintain these sites and is not responsible for the privacy practices of sites it does not operate. We encourage you to review the privacy policies posted on those websites.

Information Access, Updates and Choice

You may choose to provide information to Freenome by completing a contact form, sending us an email, engaging with our customer service team or otherwise contacting us. If you are a Freenome Portal user, you may have an opportunity to elect to receive certain communications from us. Freenome email correspondence will include instructions on how to update certain Personal Information and how to unsubscribe from our emails, newsletters, and postal mail correspondence.

You may “opt out” of receiving communications from us related to our products and services and/or to request the removal of your contact information from our database by writing to us at the privacy email address set forth below. However, Freenome cannot withdraw any previous disclosures made with your authorization, and we reserve the right to retain and disclose your information as permitted or required by law or regulation. You may also request access to your Personal Information by writing to us using the contact information below.
**Children’s Privacy**

Freenome Services are directed toward adults. We do not knowingly collect any Personal Information from children under the age of 13. If you are under 13, you must have permission from your parent or legal guardian before accessing or using our Websites or Services. If we become aware that we have collected any Personal Information from children under 13, we will promptly remove such information from our servers.

**International Users**

Our Services are located in the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your information outside of those regions to the United States for storage and processing. By providing your information, you consent to any transfer and processing in accordance with this Policy.

If you reside in the EU or Switzerland, please see our Notice of Privacy Practices for EU and Swiss Residents under GDPR. A copy of this Notice is on our home website at www.freenome.com.

**Storage and Retention of Personal Information**

We store your Personal Information using state-of-the-art technical tools, such as data encryption, access control to all systems, sharing only the minimum amount necessary with the minimum number of employees (and trained contractors) to perform our Services. We also have password protection, firewall protection and recovery mechanisms for data loss.

Personal Information is stored for as long as necessary to run your test, manage your account with us, ensure that the results are complete and accurate, bill for our services, and within industry regulations. Additionally, pseudonymized and anonymized data may be stored for additional years if necessary for research record keeping and regulatory submissions.

Physician contact information is kept until they are no longer customers. We will remove personal data of physicians who stop ordering tests from us.

**Changes to Our Privacy Policy**

We reserve the right to update and revise this Privacy Policy as necessary. If we change our Privacy Policy and Notices, we will post those changes on our Websites to keep you aware of what information we collect, how we use it, and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when they are posted on this page.

**Contact Us for Questions and Complaints**

You can contact Freenome using our Website contact page or sending an email to one of the addresses below. We address questions and complaints about privacy and the collection or use of Personal Information in a timely manner. Please include your contact information and a detailed description of your request or privacy concern.

Freenome Inc.
259 East Grand Avenue, Suite 3434
South San Francisco, CA, USA 94080
For our US Privacy Officer, please email: privacy@freenome.com.
For our EU/Swiss Data Protection Officer, please email: dpo@freenome.com.

If you feel that your complaint has not been addressed, you can also contact:

For HIPAA in the US: Office of Civil Rights at the Department of Health and Human Services website: www.hhs.gov/hipaa


Effective Date: October 1, 2018