Freenome, Inc. is a U.S. company and we are committed to protecting your privacy. We comply with U.S., United Kingdom (“UK”), European Union (“EU”) and Swiss 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.

For US residents, we adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Policy.

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 are referenced in this Privacy Policy, (the “Websites” or “Services”).

For EU, UK and Swiss residents, see the “INTERNATIONAL USERS” section below for more information regarding our EU and Swiss Privacy Shield certification and information related to UK exit from the EU, the UK Data Protection Act of 2018 (“DPA 2018”) and the EU General Data Protection Regulation of 2018 (“GDPR”).

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, UK 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 website.

Freenome’s Privacy Policy includes protection of personal data for UK residents. The UK is exiting the EU and the transition period for coverage under the GDPR for UK residents will end December 31, 2020. During this transition period, Freenome will apply GDPR privacy requirements to UK data. Following the transition, Freenome will apply the UK’s DPA 2018 requirements - which are substantially similar to the GDPR requirements. Freenome is committed to cooperate and comply with the EU Data Protection Authority for EU data, and UK data during the transition period, the Swiss Federal Data Protection and Information Commissioner for Swiss data and also with the UK Information Commissioner’s Office with regard to personal data received from the UK in reliance on Privacy Shield.

Some important 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 have implemented 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, health information, treatment information, and payment information) when you voluntarily submit it to us on our Websites or when we provide Services to you. 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 and other 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.

The categories of information we collect are:

- **Category A**: Personal identifiers such as name, address, email address, telephone numbers, account name and number and medical record identifiers.
- **Category B**: Personal information categories listed in the CCPA (signature, name, health insurance information, financial information for payment of our Services, medical information)
- **Category C**: For job applicants, employment and vendors, professional or employment-related history, performance evaluations, education, work history, credit information, bank account numbers or other financial information for payment purposes, background checks
- **Category D**: Protected classification characteristics under California and federal law: age, race, marital status, medical condition, gender identity, military status, genetic information
- **Category E**: Biometric information regarding cancer patient tumor mutations

We will not collect additional categories of Personal Information or use the Personal Information that we have collected for materially different, unrelated or incompatible purposes without providing you notice.

**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 Personal Information. 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.

We may 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 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.

Selling of Personal Information

Freenome does not, and will not, sell or rent your Personal Information to any other company, individual or organization. No Personal Information has been sold or rented in the preceding 12 months.

Your Rights and Choices under CCPA

The CCPA provides consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your identity and verify your consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  - sales, identifying the Personal Information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
Deletion Request Rights

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions including an exception for PHI which is governed by HIPAA. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the Personal Information, provide a good or Service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Call us at 831-313-8449
- Email us at privacy@freenome.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:
• Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
• Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm that the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

• Deny you goods or Services.
• Charge you different prices or rates for goods or Services, including through granting discounts or other benefits, or imposing penalties.
• Provide you a different level or quality of goods or Services.
• Suggest that you may receive a different price or rate for goods or Services or a different level or quality of goods or services.

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 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.

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.

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.

Freenome will treat all Personal Information received from the EU/EEA, UK and Switzerland in accordance with the Privacy Shield Principles and GDPR requirements. (See Notice of Privacy Practices Under GDPR for EU Residents and Privacy Shield for EU, UK and Swiss Residents located on Freenome’s website for full details)

For EU, UK and Swiss Individuals: Privacy Shield Notice for Personal Data Transfers to the United States

To protect your privacy and security, we may take steps to verify your identity, before granting access to data. If you are resident in the EEA, UK or Switzerland, we will process any access request you make in accordance with our commitments under the EU-U.S. Privacy Shield or the Swiss-U.S. Privacy Shield.

Freenome complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding
the collection, use, and retention of Personal Information from European Union member countries (and Iceland, Liechtenstein, and Norway), the United Kingdom and Switzerland transferred to the United States pursuant to Privacy Shield.

Freenome has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit https://www.privacyshield.gov/.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Freenome is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission.

Freenome has certified that it adheres to the Privacy Shield Principles of:

**Notice**

Freenome’s participation in the Privacy Shield applies to all Personal Information that is subject to this Privacy Policy and is received from the EU, European Economic Area (EEA), UK and Switzerland. Personal information received under the Privacy Shield may include information such as name and email address, health information, contact details, and billing information. Freenome uses this information to deliver its Services and to bill for payment for such Services.

**Access**

Pursuant to the Privacy Shield Frameworks, EU, UK and Swiss individuals have the right to obtain our confirmation of whether we maintain Personal Information relating to you in the United States. Upon request, we will provide you with access to the Personal Information that we hold about you. You may also correct, amend, or delete the Personal Information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to dpo@freenome.com. If requested to remove data, we will respond within a reasonable timeframe.

**Choice**

Freenome will not use Personal Information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual unless Freenome has received the individual’s affirmative and explicit consent (opt-in).

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your Personal Information, please submit a written request to dpo@freenome.com.
Accountability for Onward Transfer

Freenome contracts with third parties who perform functions on our behalf, including data processing services. These entities may have access to Personal Information for limited, specific purposes needed to perform these functions. Freenome requires these third parties to safeguard Personal Information by contract, obligating them to provide at least the same level of protection as is required by this Policy.

Freenome’s accountability for Personal Information that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Freenome remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Freenome proves that it is not responsible for the event giving rise to the damage.

Freenome may be required to disclose an individual’s Personal Information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Data Integrity and Purpose Limitation

Freenome will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Freenome will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete, and current and obtain the minimum amount of information necessary to fulfill its provision of healthcare services.

Audit and Enforcement

We conduct periodic internal and third-party compliance audits of our relevant privacy practices, procedures, and our information and data processing systems, to verify adherence to this Policy. Any employee that we determine is in violation of this Policy will be subject to retraining, disciplinary action up to and including termination of employment and potential reporting to authorities.

The Freenome privacy and security program is subject to inspection by the Secretary of Health and Human Services (HHS) with respect to personal health information; the investigatory and enforcement powers of the Federal Trade Commission (FTC) with respect to Privacy Shield, the Information Commissioner’s Officer with respect to UK data (after Brexit) and the applicable Supervisory Authority in the EU with respect to GDPR. Freenome commits to cooperate in any investigations by or inquiries from these regulators.

Complaints

In compliance with the Privacy Shield Principles, Freenome commits to resolve complaints about our collection or use of your Personal Information. EU, UK and Swiss individuals with inquiries or complaints regarding our Privacy Shield Policy should first contact Freenome, at dpo@freenome.com or you can mail us at: Data Protection
Officer, Freenome, 259 E. Grand Avenue, Suite 3434, South San Francisco, CA, USA 94080.

Freenome has 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 BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint. This service is provided free of charge to you.

Freenome has further committed to cooperate with the panel established by the EU data protection authorities (DPAs), UK Information Commissioner and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU, UK and Switzerland in the context of the employment relationship.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at https://www.privacyshield.gov/article?id=ANNEX-I-introduction.

**Legal Basis for Processing Personal Data Under GDPR**

We process your Personal Information in order to perform our healthcare Services and to bill for these Services. You have most likely provided your consent for our testing through your doctor. Additionally, our processing is necessary based on our legitimate interest of providing our healthcare services to you. We process and store your contact information so that we may contact you regarding the delivery of our healthcare services -- for doctors use in treatment purposes and for patients test result reports. This Personal Information may come to us from you, your doctors, or your pathology lab and will be used to perform our testing services as you would expect when laboratory testing is ordered for you by your doctor.

Freenome may also use pseudonymized or anonymized data for scientific research purposes related to our cancer diagnostic product improvement and development. PHI and PII are not used for this purpose; and therefore, your identity is not known during our research activities.

**For EU, UK and Swiss Individuals: Your Rights under the General Data Protection Regulation**

In some regions (like the European Economic Area, UK and Switzerland), you have certain rights under applicable data protection laws, which include the right (i) to request access and obtain a copy of your Personal Information, (ii) to request rectification or erasure; (iii) to restrict the processing of your Personal Information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your Personal Information.
You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. In some cases our ability to uphold these rights for you may depend upon our obligations to process Personal Information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

If you would like to exercise any of the above rights, please contact our Data Protection Officer at dpo@freenome.com.

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/UK/Swiss Data Protection Officer, please email: dpo@freenome.com.

Additionally, Freenome has appointed DPR Group as its Data Protection Representative in the European Union and UK so that you can contact them directly in your home country. DPR Group has locations in each of the 28 EU countries, so that you can always raise the questions you want.

If you want to raise a question to Freenome, Inc., or otherwise exercise your rights with respect of your Personal Information you may do so by:

- For questions about how we process your Personal Information and to make requests with respect to your data, please contact us at dpo@freenome.com or DPO, Freenome, Inc., 259 East Grand Avenue, Suite 3434, South San Francisco, CA, 94080
- If you are based in the EU, you can do the following:
  - a. Send an email to DPR Group at datainquiry@dpr.eu.com using
“Freenome, Inc.” in the subject line

• If you are based in the UK, you can:
  a. Send an email to DPR Group at datainquiry@dpr.eu.com using
     “Freenome Inc” in the subject line and identify your UK residency or
  b. Send a written request to: DPR Group, BPM 335368, 372 Old Street,
     EC1V 9AU, London, United Kingdom (do not list Freenome in the
     address, but please refer to them in your request)

• Contacting us on our online webform at www.dpr.eu.com/datarequest, or
• If you would like to mail your inquiry to a country other than the UK, please
  email DPR Group at datainquiry@dpr.eu.com to request the most appropriate
  mailing address. PLEASE NOTE: when mailing inquiries, it is ESSENTIAL
  that you mark your letters for ‘DPR Group’ and not ‘Freenome, Inc.” or your
  inquiry may not reach us. Please refer clearly to Freenome, Inc. in your
  correspondence.

When we receive your correspondence, we are likely to request evidence of your
identity, to ensure that your personal data and information connected with it is not
provided to anyone other than to you.

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
For Privacy Shield in the EU/Switzerland: Better Business Bureau EU Privacy Shield,
http://www.bbb.org/EU-privacy-shield/for-eu-consumers

Effective Date: February 13, 2020