

### Privacy Statement Highlights

These “**Privacy Statement Highlights**” provide an overview of some core components of our data handling practices. Please be sure to review the “**Full Privacy Statement**”.

#### **Information We Collect**

We generally collect the following information:

- **Information we receive when you use our Services.** We do not collect Web-Behavior Information via cookies and similar tracking technologies when you use and access our Services (our website, mobile apps, products, software, and other services).
- **Information you share directly with us.** We collect and process your information when you create an account, complete research surveys, post on our Forums or use other messaging features, and contact Customer Care. This information can generally be categorized as Registration Information, Self-Reported Information, and/or User Content as defined in our full Privacy Statement.
- **Information from our DNA testing services.** With your consent, your prescriber will collect genetic material via means such as a cheek swab, saliva sample, or a small blood sample. They will send the sample to a laboratory where they will extract your DNA from the sample and analyze it to produce your Genetic Information (the As, Ts, Cs, and Gs at particular locations in your genome) in order to provide you with genetic reports.

#### **How We Use Information**

We generally process Personal Information for the following reasons:

- **To provide our Services.** We process Personal Information to provide our Service, which includes creating customer accounts and authenticating logins.
- **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 or analyze the use of our website to improve the customer experience.
- **For the MIMI-Rx Registry Research Project, with your consent.** If you choose to consent to participate in any research, then researchers can include your de-identified Genetic Information and Self-Reported Information in a large pool of customer data for analyses aimed at improving treatment approaches.

#### **Control: Your Choices**

MIMI-Rx Registry gives you the ability to share information in a variety of ways. You choose:

- **Which health report(s)** you view and/or opt-in to view.
- When and with whom **you share your information**, including caregivers, family members, health care professionals, or others outside our services, including through third-party services that accept MIMI-Rx Registry data and social networks.
- To give or decline consent for MIMI-Rx Registry Research. By agreeing to the Research Consent Document, Individual Data Sharing Consent Document, or participating in a MIMI-Rx Registry Research Community, you can consent to using your data for scientific research purposes.
- To delete your MIMI-Rx Registry account and data at any time.

#### **Access To Your Information**

Your Personal Information may be shared information in the following ways:

- **With our service providers**, including our genotyping laboratory, as necessary for them to provide their services to us.
- **With research collaborators**, only if you have given your explicit consent. MIMI-Rx Registry will not sell, lease, or rent your individual-level information to any third party or to a third party for research purposes without your explicit consent.
- **We do not** share customer 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.

### **How We Secure Information**

MIMI-Rx Registry implements measures and systems to ensure the confidentiality, integrity, and availability of MIMI-Rx Registry data.

**De-identification/Pseudonymization, encryption, and data segmentation.** Registration Information is stripped from Sensitive Information, including genetic and phenotypic data. This data is then assigned a random ID so the person who provided the data cannot reasonably be identified. MIMI-Rx Registry uses industry-standard security measures to encrypt sensitive personal data both when it is stored (data-at-rest) and when it is being transmitted (data-in-flight). Additionally, data are segmented across logical database systems to prevent re-identifiability further.

**Limiting access to essential personnel.** We limit access of information to authorized personnel based on job function and role. MIMI-Rx Registry access controls include multi-factor authentication, single sign-on, and a strict least-privileged authorization policy.

**Detecting threats and managing vulnerabilities.** MIMI-Rx Registry uses state-of-the-art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning in our build pipeline and regularly engage third-party security experts to conduct penetration tests.

### **Risks and Considerations**

There may be some consequences of using the MIMI-Rx Registry 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.

## Full Privacy Statement

This Privacy Statement applies to all websites owned and operated by MIMI-Rx Registry, and any other websites, pages, features, or content we own or operate, and to your use of the MIMI-Rx Registry mobile app and any related Services. Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services.

Please carefully review this Privacy Statement and our Terms of Service. By using our Services, you acknowledge all of the policies and procedures described in the documents. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement or our Terms of Service you should immediately discontinue use of our Services.

Contents

<b>Full Privacy Statement</b> .....	<b>3</b>
1. Key Definitions .....	4
2. Information we collect.....	4
a. Information you provide directly to us .....	4
b. Web-behavior information collected through tracking technology .....	5
c. Other Types of Information .....	6
3. How we use your information .....	6
a. To provide you with Services and analyze and improve our Services .....	6
b. To allow you to share your Personal Information with others .....	6
c. To allow to share your Personal Information for MIMI-RX Registry Research purposes ....	6
d. To recruit you for external research .....	7
e. To provide customer support .....	8
f. To conduct surveys or polls and obtain testimonials .....	8
g. To provide you with marketing communications.....	8
4. Information we share with third parties .....	8
a. General service providers.....	8
b. Aggregate information .....	9
c. Information we share with commonly owned entities .....	9
d. As required by law .....	9
e. Business transactions.....	10
5. Your choices .....	10
a. Access to your account.....	10
b. Marketing communications .....	10
c. Sharing outside of the MIMI-RX Registry Services.....	10
d. Account deletion .....	11
6. Security measures.....	11
7. Linked websites .....	12
8. Complaints.....	14
9. Changes to this Privacy Statement.....	14
10. Contact Information .....	14

## 1. Key Definitions

1. **Aggregate Information:** information that has been combined with that of other users and analyzed or evaluated as a whole, such that no specific individual may be reasonably identified.
2. **De-identified Information:** information that has been stripped of your Registration Information (e.g., your name and contact information) and other identifying data such that you cannot reasonably be identified as an individual, also known as pseudonymized information.
3. **Individual-level Information:** information about a single individual's genotypes, diseases or other traits/characteristics, but which is not necessarily tied to Registration Information.
4. **Personal Information:** information that can be used to identify you, either alone or in combination with other information. MIMI-Rx Registry collects and stores the following types of Personal Information:
  - a. **Registration Information:** information you provide about yourself when registering for and/or purchasing our Services (e.g. name, email, address, user ID and password, and payment information).
  - b. **Genetic Information:** information regarding your genotypes (i.e. the As, Ts, Cs, and Gs at particular locations in your genome), generated through processing of your genetic information by laboratories and contributed to MIMI- Rx Registry.
  - c. **Self-Reported Information:** information you provide directly to us, including your disease conditions, other health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your MIMI-RX Registry account.
  - d. **Sensitive Information:** information about your health, Genetic Information, and certain Self-Reported Information such as racial and ethnic origin, sexual orientation, and political affiliation.
  - e. **User Content:** all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - other than Genetic Information and Self-Reported Information-generated by users of MIMI-RX Registry Services and transmitted, whether publicly or privately, to or through MIMI-RX Registry.
  - f. **Web-Behavior Information:** information on how you use MIMI-RX Registry Services collected through log files, web beacons, and similar technologies (e.g., browser type, domains, page views).

## 2. Information we collect

- a. **Information you provide directly to us**
  - i. **Registration Information.** When you create a MIMI-RX Registry account, we collect Personal Information, such as your name, date of birth, and contact information (e.g. email and phone number).
  - ii. **Self-Reported Information.** You have the option to provide us with additional information about yourself through surveys, forms, features and 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). Before you disclose information about a family member, you should ensure you have permission from the family member.
  - iii. **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**").

- iv. **Social media features and widgets.** Our Services include Social Media Features, such as the Facebook "Like" or "Share" button and widgets ("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. The information 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 statements of the third-party companies providing them. 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.
- v. **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 the third-party site's information practices, so please review the third-party's privacy statement and your settings on the third-party site carefully.
- vi. **Referral information and sharing.** When you refer a person to MIMI-RX Registry or choose to share your MIMI-RX Registry results with another person, we will ask for that person's email address. We will use their email address solely, as applicable, to make the referral or to communicate your sharing request to them, 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 MIMI-RX Registry to communicate (e.g., via email) with him or her. The person you referred may contact us at [Efh.support@theeagleforce.net](mailto:Efh.support@theeagleforce.net) to request that we remove this information from our database.
- vii. **Customer service.** When you contact Customer Care 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.

b. **Web-behavior information collected through tracking technology**

(e.g., from cookies and similar technologies)

We and our third-party service providers use cookies and similar technologies (such as web beacons, tags, scripts, and device identifiers) to help us recognize you when you use our Services;

- i. Customize and improve your experience;
- ii. provide security;
- iii. analyze usage of our Services (such as to analyze your interactions with the results, reports, and other features of the Service);
- iv. gather demographic information about our user base;
- v. offer our Services to you;
- vi. monitor the success of marketing programs; and
- vii. serve targeted advertising on our site and on other sites around the Internet.

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. For more information, including the types of cookies found on the MIMI-RX Registry and how to control cookies, please read our Cookie Policy.

We may receive reports based on the use of these technologies from third-party service providers as de-identified, Individual-level, or Aggregate Information (as described in section 4. c). We and our third-party service providers do not use your Sensitive Information, such as Genetic Information and Self-reported information, for targeted advertising.

### **c. Other Types of Information**

We continuously work to enhance our Services with new products, applications, and features that may result in collecting new and different types of information. We will update our Privacy Statement and/or obtain your prior consent to new processing, as needed.

## **3. How we use your information**

MIMI-RX Registry will use and share your Personal Information with third parties only in the ways described in this Privacy Statement.

### **a. To provide you with Services and analyze and improve our Services**

We use the information described above in Section 2 to operate, provide, analyze, and improve our Services. These activities may include, among other things, using your information in a manner consistent with this Privacy Statement to:

- i. Open your account, communicate with you, and implement your requests (e.g., referrals);
- ii. enable and enhance your use of our website and mobile application(s), including authenticating your visits, providing personalized content and information, and tracking your usage of our Services;
- iii. contact you about your account, and any relevant information about our Services (e.g. policy changes, security updates or issues, etc.);
- iv. enforce our Terms of Service and other agreements;
- v. monitor, detect, investigate and prevent prohibited or illegal behaviors on our Services, to combat spam and other security risks; and
- vi. 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.

### **b. To allow you to share your Personal Information with others**

MIMI-RX Registry gives you the ability to share information, including Personal Information, through the Services. You have the option to share directly with individuals with MIMI-RX Registry accounts through. You may also have the ability to share information directly with individuals who have not participated in our Service via a unique, shareable URL or through a social media platform (such information is "User Content"). Some sharing features, including receiving sharing invitations, may require that you opt-out, however you will always be required to take a positive action, such as opting in, to share sensitive data.

### **c. To allow to share your Personal Information for MIMI-RX Registry Research purposes**

You can participate in MIMI-RX Registry Research by providing your consent. "MIMI-RX Registry Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by MIMI-RX Registry.

MIMI-RX Registry Research may be sponsored by, conducted on behalf of, or in collaboration with third parties, such as non-profit foundations, academic institutions or pharmaceutical companies. MIMI-RX Registry Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose,

predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. MIMI-RX Registry Research uses Aggregate and/or Individual-level Genetic Information and Self-Reported Information as specified in the appropriate Consent Document(s), as explained in greater detail below.

Your De-identified Genetic and Self-Reported Information may be used for MIMI-RX Registry Research only if you have consented to this use by completing a Consent Document. If you have completed the Main Research Consent Document:

- i. Your Genetic Information and/or Self-Reported Information will be used for research purposes, but it will be de-identified and will not be linked to your Registration Information.
- ii. MIMI-RX Registry may use individual-level Genetic Information and Self-Reported Information internally at MIMI-RX Registry for research purposes.
- iii. MIMI-RX Registry may share summary statistics, which do not identify any particular individual or contain individual-level information, with our qualified research collaborators.

If you have completed the Individual Level Data Sharing Consent, or additional consent agreement, in addition to the uses above under the Main Consent Document, MIMI-RX Registry may share De-identified Individual-level Genetic Information and Self-Reported Information with select third party research collaborators for MIMI-RX Registry partners for Research purposes.

**Withdrawing your Consent.** You may withdraw your consent to participate in MIMI-RX Registry Research at any time by changing your consent status within your Account Settings. If you experience difficulties changing your consent status, contact the Human Protections Administrator at [Efh.support@theeagleforce.net](mailto:Efh.support@theeagleforce.net).

MIMI-RX Registry will not include your Genetic Information or Self-Reported Information in studies that start more than 30 days after you withdraw (it may take up to 30 days to withdraw your information after you withdraw your consent). Any research involving your data that has already been performed or published prior to your withdrawal from MIMI-RX Registry Research will not be reversed, undone, or withdrawn. You may also discontinue your participation in MIMI-RX Registry Research by deleting your MIMI-RX Registry account (as described in section 5.d).

**What happens if you do NOT consent to MIMI-RX Registry Research?** If you choose not to complete a Consent Document or any additional agreement with MIMI-RX Registry, your Personal Information will not be used for MIMI-RX Registry Research. However, as outlined in this Privacy Statement, your Genetic Information and Self-Reported Information may still be used by us and shared with our third-party service providers.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time, however, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

#### **d. To recruit you for external research**

Research is an important aspect of MIMI-RX Registry's Services and we want to ensure interested participants are aware of additional opportunities to contribute to interesting, novel scientific research conducted by academic institutions, healthcare organizations, pharmaceutical companies, and other groups. If you have chosen to participate in MIMI-RX Registry Research, from time to time, we may inform you of third-party research opportunities for which you may be eligible. For example, suppose a university tells us about a new cancer research project. In that case, we may send an email to MIMI-RX Registry research

participants who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. However, we will not share Individual-level Genetic Information or Self-Reported Information with any third party without your consent. If you do not wish to receive these notifications, you can manage them by editing your preferences in your Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Sensitive Information for the purpose described above is based on your consent. You may withdraw your consent at any time. However, the withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal.

**e. To provide customer support**

When you contact Customer Care, we may use or request Personal Information, including Sensitive Information, as necessary to answer your questions, resolve disputes, and/or investigate and troubleshoot problems or complaints. In some instances, we may be required to process one customer's Personal Information to resolve another customer's dispute or request. For example, if a customer reports behavior that violates our Terms of Service, we will separately process both customers' Personal Information and respond separately to each individual as appropriate. We will not share your Personal Information with another customer without your consent.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above depends on the nature of the customer support request. Our legal basis can be to satisfy our contractual or legal obligations and/or our legitimate interest to improve our Services.

**f. To conduct surveys or polls and obtain testimonials**

We value your feedback and may send you surveys, polls, or requests for testimonials to improve and optimize our Services. You are in control of the information you would like to share with us. If you do not wish to receive these requests, you can manage them in your Account Settings.

For individuals located in the Designated Countries: Our legal basis for processing your Personal Information for the purpose described above is based on our legitimate interest. We think it is essential to continue improving our Services to ensure your continued enjoyment.

**g. To provide you with marketing communications**

**4. Information we share with third parties**

**a. General service providers.**

Service providers are third parties (other companies or individuals) that help us to provide, analyze and improve our Services. While MIMI-RX Registry directly conducts the majority of data processing activities required to provide our Services to you, we engage some third party service providers to assist in supporting our Services, including in the following areas:

i. **Customer Care support.** Our Customer Care team uses a number of tools to help organize and manage the requests we receive. These tools help to ensure we provide timely, high quality support.

ii. **Cloud storage, IT, and Security.** Our cloud storage providers provide secure storage for information in MIMI-RX Registry databases, ensure that our infrastructure can support continued use of our Services by MIMI-RX Registry customers, and protect data in the event of a natural disaster or other disruption to the Service. Our IT and security providers assist with intrusion detection and prevention measures to stop any potential attacks against our networks. We have these third party experts perform regular penetration tests and periodically



audit MIMI-RX Registry's security controls.

iii. **Marketing and analytics.** When you use our Services, including our website or mobile app(s), our third party service providers may collect Web-Behavior Information about your visit, such as the links you clicked on, the duration of your visit, and the URLs you visited. This information can help us improve site navigability and assess our Marketing campaigns. Per applicable data protection regulations, our EU, UK, and International websites present visitors with a cookie opt in to allow the processing described above via Functionality and Advertising Cookies.

NOTE: Our service providers act on MIMI-RX Registry's behalf. We implement procedures and maintain contractual terms with each service provider to protect the confidentiality and security of your information. However, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically.

b. **Aggregate information**

We may share Aggregate Information, which is information that has been stripped of your name and contact information and combined with information of others so that you cannot reasonably be identified as an individual, with third parties. This Information is different from "Individual-level" information and is not Personal Information because it does not identify any particular individual or disclose any particular individual's data. 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. In contrast, Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, diseases or other traits/characteristics information and could reveal whether a specific user has a particular genetic trait, or consist of all of the Genetic Information about that user. MIMI-RX Registry will ask for your consent to share Individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.

c. **Information we share with commonly owned entities**

We may share some or all of your Personal Information with other companies under common ownership or control of MIMI-RX Registry, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent in order to provide you better service and improve user experience. Generally, sharing such information is necessary for us to perform on our contract with you. We may provide additional notice and ask for your prior consent if we wish to share your Personal Information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

d. **As required by law**

Under certain circumstances your Personal Information may be subject to processing pursuant to laws, regulations, judicial or other government subpoenas, warrants, or orders. For example, we may be required to disclose Personal Information in coordination with regulatory authorities in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. MIMI-RX Registry 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 MIMI-RX Registry may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the MIMI-RX Registry 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 MIMI-RX Registry, its employees, its users, its clients, and the public. View our Transparency Report for more information.

NOTE: If you are participating in MIMI-RX Registry Research, MIMI-RX Registry will withhold disclosure of your Personal Information involved in such Research in response to judicial or other

government subpoenas, warrants or orders in accordance with any applicable Certificate of Confidentiality that MIMI-RX Registry has obtained from the National Institutes of Health (NIH). There are limits to what the Certificate of Confidentiality covers so please visit the Certificates of Confidentiality Kiosk.

e. **Business transactions**

In the event that MIMI-RX Registry goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets your Personal 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.

**5. Your choices**

a. **Access to your account**

We provide access to your MIMI-RX Registry data within your MIMI-RX Registry account. You can access and download data processed by MIMI-RX Registry within your Account Settings and within applicable Reports, Tools, and features. If you lose access to your MIMI-RX Registry account or account email address, please get in touch with Customer Care for assistance. If you lose access to your MIMI-RX Registry 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, MIMI-RX Registry will not be able to verify your identity to complete your request sufficiently.

You may access, correct, or update most of your Registration Information on your own within your Account Settings. You may also review and update your consent to MIMI-RX Registry Research and Biobanking. 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.

Individuals located in Designated Countries should review Section 8.e. to understand their rights to access Personal Information.

b. **Marketing communications**

As noted in Section 3.h. you may be asked to opt-in to receive product and promotional emails or notifications when creating your MIMI-RX Registry account depending on where you are located. Otherwise, you may view or update your email notification preferences by visiting your Account Settings or by contacting our Privacy Administrator at [Efh.support@TheEagleForce.net](mailto:Efh.support@TheEagleForce.net). You can also click the "unsubscribe" button at the bottom of promotional email communications.

c. **Sharing outside of the MIMI-RX Registry 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. MIMI-RX Registry 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. MIMI-RX Registry 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 MIMI-RX Registry 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 processed, you may delete your MIMI-RX Registry account and Personal Information within your Account Settings. Once you submit your request, we will send an email to the email address linked to your MIMI-RX Registry account detailing our account deletion policy and requesting that you to 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 canceled, 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:

- i. Information previously included in MIMI-RX Registry Research. As stated in any applicable Consent Document, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in MIMI- RX Registry Research cannot be removed from completed studies that use that information. Your data will not be included in studies that start more than 30 days after your account is closed (it may take up to 30 days to withdraw your information after your account is closed).
- ii. Legal Retention Requirements. MIMI-RX Registry and our third-party genotyping laboratory will retain your Genetic Information, date of birth, and sex as required for compliance with applicable legal obligations, including the federal Clinical Laboratory Improvement Amendments of 1988 (CLIA) and CA Business and Professional Code Section 1265 and CAP accreditation requirements. MIMI-RX Registry 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, and record of legal agreements for a limited period of time as required by contractual obligations, and/or as necessary for the establishment, exercise or defense of legal claims and for audit and compliance purposes.

#### **6. Security measures**

MIMI-RX Registry takes seriously the trust you place in us. MIMI-RX Registry implements physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your Personal Information.

- **MIMI-RX Registry produces secure applications by design.** MIMI-RX Registry incorporates explicit security reviews in the software development lifecycle, quality assurance testing and operational deployment.
- **De-identification/Pseudonymization.** Registration Information is stripped from Sensitive Information, including Genetic and Self-Reported Information. This data is then assigned a randomly generated ID so an individual cannot reasonably be identified.
- **Encryption.** MIMI-RX Registry uses industry-standard security measures to encrypt Sensitive Information at rest and in transit.
- **Separation of Environments.** MIMI-RX Registry ensures processing, production, and research environments are separated, and access is restricted. Data, including Registration Information, Genetic Information, and Self-Reported Information, are segmented across logical database systems to prevent re-identifiability further.

- **Limiting access to essential personnel.** We limit access to Personal Information to authorized personnel based on job function and role. MIMI-RX Registry access controls include multi-factor authentication, single sign-on, and a strict least-privileged authorization policy.
- **Detecting threats and managing vulnerabilities.** MIMI-RX Registry uses state-of-the-art intrusion detection and prevention measures to stop any potential attacks against its networks. We have integrated continuous vulnerability scanning into our processes and regularly engage third-party security experts to conduct penetration tests.
- **Incident Management.** MIMI-RX Registry maintains a formal incident management program designed to ensure the secure, continuous delivery of its Services. MIMI-RX Registry has implemented an incident management program using industry best practices, including guidance from the National Institute of Standards and Technology (NIST).
- **Managing third-party service providers.** MIMI-RX Registry requires service providers to implement and maintain accepted industry standard administrative, physical, and technical safeguards to protect Personal Information.

**Your Responsibility.** Please recognize that protecting your Personal Information is also your responsibility. We ask you to safeguard 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 immediately notify MIMI-RX Registry of any unauthorized password use. MIMI-RX Registry cannot secure Personal Information that you release on your own or 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 MIMI-RX Registry 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.

## **7. Linked websites**

MIMI-RX Registry provides links to third-party websites operated by organizations not affiliated with MIMI-RX Registry. MIMI-RX Registry does not disclose your information to organizations operating such linked third-party websites. MIMI-RX Registry 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 the MIMI-RX Registry and our service providers on our behalf.

- Right to withdraw consent.** To the extent MIMI-RX Registry requests and you provide your consent to process your Personal Information, you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of our processing based on consent before your withdrawal.
- Right of access to and rectification of your Personal Information.** Our site allows you to access and rectify certain Registration Information within your Account Settings and your Self-Reported Information by going to the surveys page. You can download your raw Genetic Information within your Account Settings or by going to the applicable tool in “Tools.” If you would like to access or rectify any other information, contact Customer Care, and we will do our best to assist you without undue delay. We may reject part or all of your request if responding to your request could adversely affect the rights and freedoms of others.
- Right to erasure (or, “Right to be Forgotten”).** As Section 5.d. (“Account Deletion”) explains, we allow our customers to delete their accounts at any time. You can request the erasure of Personal Information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing to which you previously consented, but later withdrew such consent; or (c) was collected in

relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your Personal Information public and we are required to erase such Personal Information, we will take reasonable steps, including technical measures, to inform controllers that are processing any links to or copies or replications of your Personal Information of your erasure request. Our assistance with your request for erasure is subject to limitations by relevant data protection laws, available technology and the cost of implementation.

- iv. **Right to data portability.** If we process your Personal Information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Information in a structured, commonly used and machine-readable format, and to have us transfer your Personal Information directly to another controller, where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others. A “controller” is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing your Personal Information.
- v. **Right to restriction of our processing.** You can restrict our processing of your Personal Information where one of the following applies: (a) you dispute the accuracy of Personal Information processed by MIMI-RX Registry (for a period enabling us to verify its accuracy); (b) the processing is unlawful, and you oppose the erasure of the Personal Information and request the restriction of its use instead; (c) MIMI-RX Registry no longer needs the Personal Information for the processing, but you require it for the establishment, exercise or defense of legal claims; and (d) you have objected to certain processing relying on legitimate interest, pending the verification whether MIMI- RX Registry’s legitimate grounds override your rights. Restricted Personal Information shall only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest. We will notify you if the restriction is lifted.
- vi. **Notification of erasure, rectification and restriction.** We will provide notice to each recipient that we disclosed your Personal Information to regarding any rectification or erasure of Personal Information or restriction of processing, unless you initiated the disclosure or providing notice proves impossible or involves disproportionate effort. Upon your request, we will share the list of recipients with you.
- vii. **Right to object to processing.** Where the processing of your Personal Information is based on consent, contract, or legitimate interests described under the Legal Bases for Processing heading above, you may restrict or object, at any time, to the processing of your Personal Information as permitted by applicable law. We may continue to process your Personal Information if it is necessary for the defense of legal claims or for any other exceptions permitted by applicable law.
- viii. **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on you, except as allowed under applicable data protection laws.
- ix. **Retention of your Personal Information.** Unless you request for us to delete your account or delete certain Personal Information (i.e., User Content, etc.), we will store your Personal Information as long as your account is open. If you request to delete your account, we will take the steps described under “Your Choices – Account Deletion” and delete all your Personal Information unless a more extended retention period is required or permitted by law.

Local laws may limit the rights described above. Further, your right of access and deletion is not absolute and may not be available if fulfillment of such right would, among other things:

- cause interference with execution and enforcement of the law and legal private rights (such as in the case of the investigation or detection of legal claims or the right to a fair trial);
- breach or prejudice the rights of confidentiality and security of others;
- prejudice security or grievance investigations, corporate re-organizations, future and ongoing negotiations with third parties, the compliance with regulatory requirements relating to economic and financial management; or
- otherwise violate the interests of others or where the burden or cost of providing access would be disproportionate.

#### **8. Complaints**

If you believe that we have infringed your rights, we encourage you to contact us so that we can try to address your concerns or dispute informally. Our contact information is:

Global Privacy Officer, EagleForce Health,  
13241 Woodland Park Road, Herndon, VA 20171  
1.855.481.2110, [Efh.support@TheEagleForce.net](mailto:Efh.support@TheEagleForce.net)

#### **9. Changes to this Privacy Statement**

Whenever this Privacy Statement is changed materially, a notice will be posted as part of this Privacy Statement and on our website for 30 days. After 30 days, the changes will become effective. In addition, all customers will receive an email with a notification of the changes prior to the change becoming effective. MIMI-RX Registry may provide additional "just-in-time" disclosures or additional information about the data collection, use, and sharing practices of specific Services. Such notices may supplement or clarify MIMI-RX Registry's privacy practices or may provide you with additional choices about how MIMI-RX Registry processes your Personal Information.

#### **10. Contact Information**

If you have questions about this Privacy Statement or wish to submit a complaint, please email MIMI-RX Registry's Privacy Administrator at [Efh.support@TheEagleForce.net](mailto:Efh.support@TheEagleForce.net), or send a letter to:

Global Privacy Officer, EagleForce Health,  
13241 Woodland Park Road, Herndon, VA 20171  
1.855.481.2110, [Efh.support@TheEagleForce.net](mailto:Efh.support@TheEagleForce.net)