

## Virtual Geneticist™ Platform Data Privacy Policy

*Last Updated: February 10, 2025*

### 1. Introduction

We are committed to protecting your personal and genomic data. This Data Privacy Policy explains how we collect, use, and share your information when you use our genomic analysis software platform Virtual Geneticist™.

Your privacy is important to us, and we comply with relevant data protection laws and regulations, such as the General Data Protection Regulation (GDPR) and the Health Insurance Portability and Accountability Act (HIPAA), where applicable.

### 2. Information We Collect

We collect the following types of information:

- **Personal Data:** Identifiable information such as your name, email address, and other contact details.
- **Genomic Data:** Genetic information submitted to or generated by the platform, including raw genomic sequences, variants, and any derivative data.
- **Usage Data:** Information about your interactions with our platform, including IP addresses, device information, browser type, and user activity.

### 3. How We Use Your Information

Your data is used for the following purposes:

- **Platform Services:** To provide, maintain, and improve the features and services of our genomic platform.
- **Research and Development:** To enhance the accuracy of genomic analysis and develop new features.
- **Communication:** To send you updates, notifications, and information regarding your use of the platform.
- **Compliance:** To comply with legal obligations and resolve disputes, enforce our agreements, and protect our rights.

### 4. Data Sharing and Disclosure

We do not sell or rent your personal or genomic data. However, we may share your data under the following circumstances:

- **Research and Development:** We reserve the rights to share your de-identified non-PHI data with third party research partners, under strict data protection agreements. PHI refers to Protected Health Information and can include private information such as name, address, date of birth, medical history, diagnosis, treatment, and treatment information.

# BREAKTHROUGH GENOMICS

- **Service Providers:** We may share non PHI data and information with third-party service providers who assist us in operating our platform (e.g., cloud storage providers), under strict data protection agreements.
- **Legal Requirements:** We may disclose your data when required by law, regulation, or legal process, or to protect our rights and the rights of others.

## 5. Data Storage and Security

We use industry-standard security measures to protect your data from unauthorized access, disclosure, alteration, or destruction. Genomic and personal data are encrypted both in transit and at rest. Access to your data is restricted to authorized personnel only, and regular security audits are performed to ensure compliance with security protocols.

## 6. Data Retention

We retain your data only for as long as necessary to provide the services or as required by law. Upon request, personal data can be deleted, and genomic data can be anonymized, making it non-identifiable.

## 7. Your Rights

Depending on your location, you may have the following rights regarding your data:

- **Access:** You can request access to the data we hold about you.
- **Correction:** You can ask us to correct inaccurate or incomplete data.
- **Deletion:** You can request the deletion of your data, subject to legal obligations.
- **Data Portability:** You may request a copy of your data in a machine-readable format.
- **Consent Withdrawal:** You can withdraw consent for specific data uses at any time without affecting the lawfulness of prior data processing.

## 8. International Data Transfers

We operate globally, and your data may be transferred and stored in countries outside your home country. We ensure that any cross-border data transfers comply with relevant data protection laws and that your data remains protected to the same standard as in your home jurisdiction.

## 9. Changes to This Privacy Policy

We may update this privacy policy from time to time. When changes are made, we will notify you by updating the "Last Updated" date above and, where appropriate, providing additional notice.

## 11. Contact Us

If you have any questions or concerns about this privacy policy or your data, please contact us at:

Breakthrough Genomics  
2 Hughes #100, Irvine, CA 92618

BREAKTHROUGH  
GENOMICS

info@btgenomics.com  
949-229-0094

Your privacy and trust are paramount to us, and we are committed to ensuring that your data is handled with the utmost care and respect.