

PRIVACY POLICY V.1.00

1. Introduction

Welcome to precisionbiomonitoring.com (the “Site”), a website operated by Precision Biomonitoring Inc. (“PBI”, “we”, “us”, “our”). We operate and provide a hardware device (“Hardware”), various consumables and reagents for viral processing, genetic material extraction, molecular analysis (“Consumables”), as well as online and downloadable application-based software (“Software”) which enable users (“Users”), such as healthcare professionals, to conduct molecular analysis and share data (collectively, the “Service”). Our Site provides further information about our Service. We collect, use, and disclose information from and/or about you when you use the Site or the Service.

We developed this privacy policy (“Privacy Policy”) to explain how we handle the information collected through the use of our Site and Service. Portions of the Site may describe privacy practices applicable to specific types of information or to information provided on specific web pages.

This Privacy Policy does not apply to information collected through other means such as by telephone or in person, although that information may be protected by other privacy policies. By visiting and/or using our Site and participating in the Service, you agree to abide to this Privacy Policy.

So we are clear about terms we are using, when we use the term “Personal Information” in this Privacy Policy, we mean information about an identifiable individual or that can be used to identify an individual, such as your healthcare professional contact information (e.g., name, email address or telephone number), and any other information that is associated with such information. When we use the term “Cookies”, we mean the small pieces of information that a website sends to your browser while you are viewing a website. Cookies may include “single-session cookies” which generally record information during only a single visit to a website and then are erased, and “persistent” cookies which are generally stored on a computer unless or until they are deleted or are set to expire.

In the course of providing the Service, PBI processes biological samples from Users’ test subjects on behalf of the User. PBI does not specifically obtain from Users any identifiable information of Users’ test subjects such as name or similar personal identifiers. Users of our Service are responsible for obtaining the express consent (in the format required by applicable laws) of all test subjects and/or the parent/guardian/substitute decision maker of all test subjects under the age of majority or who are unable to provide meaningful, informed consent, prior to User’s administration of the Service to such test subjects. The express consent must fully describe PBI’s collection, use and disclosure of biological samples and associated data as described herein, including PBI’s use and disclosure of Service Analyses data as described in the Terms.

Neither the Site nor the Service is directed to children and children are not eligible to use our Service as a User. If you are under age 18, please do not attempt to use our Service or provide any Personal Information about yourself to us.

2. Your Personal Information

How We Collect and Use Personal Information

We receive Personal Information that may consist of Personal Information submitted through the Hardware, Software and/or the Site, or that you actively submit.

When you voluntarily provide or request information, subscribe to the Service or otherwise actively enter Personal Information, you will know what data we collect, because you actively submit it. You can elect not to provide Personal Information by not entering it when asked.

When you provide such information, you are agreeing that we may use that information to provide the Service and any related products, services, and offerings that you have requested or for which you have registered and to contact you to learn about your experience and to improve our product and service offerings. You may withdraw your consent for us to collect, use and disclose your Personal Information at any time, by contacting us at the email address provided at the end of this Privacy Policy. It is important to realize, however, that withdrawal of your consent will not operate retroactively and may impact your ability to use our Service.

- To respond to an email or particular request from you.
- To personalize the Site for you.
- To administer surveys and promotions.
- To provide you with information that we believe may be useful to you, such as information about products or services provided by us or other businesses.
- To perform analytics and to improve our products, websites, and advertising.
- To comply with applicable laws, regulations, and legal process.
- To protect someone's health, safety, or welfare.
- To protect our rights, the rights of affiliates or related third parties, or take appropriate legal action, such as to enforce our Terms of Use.
- To keep a record of our transactions and communications.
- As otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law.

We may use Personal Information to contact you through any contact information you provide through our Site, including any email address, telephone number, cell phone number, text message number, or fax number.

We provide you with an opportunity to let us know your preference in terms of receiving promotional commercial electronic messages when you register for our Service, provide us with Personal Information, or when we send you messages. This option applies to promotional messaging only, as we may find it necessary to send you emails or text messages related to your account or the Service. Promotional messages that you receive from PBI will tell you how to decline receiving future promotional messages. We do not ask for your credit card or account information over text or email.

We may also share Personal Information within PBI, and we may combine Personal Information that you provide us through this Site with other information we have received from you, whether online or offline, or from other sources such as from our vendors. For example, if you are participating in the Service, we may combine Personal Information you provide through our Site or Software with information regarding your receipt or usage of the Hardware, Consumables or Software.

Sharing Personal Information

We will only share your Personal Information with third parties as outlined in this Privacy Policy and as otherwise permitted or required by law.

We may share Personal Information if all or part of PBI is sold, merged, dissolved, acquired, or in a similar transaction.

We may share Personal Information in response to a court order, subpoena, search warrant, law, or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting activities that are illegal, violate our rules, or may be harmful to other Users.

We may also share Personal Information with other third-party companies that we collaborate with or hire to perform services on our behalf. For example, we may hire a company to help us send and manage email, and we might provide the company with your email address and certain other information in order for them to send you an email message on our behalf. Similarly, we may hire companies to host or operate some of our websites and related computers and software applications.

This Service may permit you to view your visitor profile and related Personal Information and to request changes to such information. If this function is available, we will include a link on this website with a heading such as “My Profile” or similar words. Clicking on the link will take you to a page through which you may review your visitor profile and related personal information.

3. Passively Tracked Information.

How We Collect Passively Tracked Information

When you use the Site or the Service, certain information may be passively collected by Cookies, navigational data like Uniform Resource Locators (URLs) and third-party tracking services (collectively, “Passively Tracked Information”), such as:

We keep track of some of the actions you take on the Site, such as the content of searches you perform on the Site.

When you access the Software or Site from a computer, Hardware or other device, we may collect information from that device, such as your Internet protocol address, browser type and access times.

We may use both session Cookies (which expire once you close your web browser) and persistent Cookies to make the Site and Service easier to use, to make our advertising better, and to protect both you and PBI. You can instruct your browser, by changing its options, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. If you do not accept Cookies, however, you may not be able to stay logged in to the Site.

Our Site uses Google Analytics. Google Analytics allows us to analyze and enhance User experience by better understanding how you interact with our website. For more information on how Google Analytics collects and processes information, as well as how you can control the information sent to Google, please review Google’s site “How Google uses data when you use our partners’ sites or apps” located at www.google.com/policies/privacy/partners/.

Google Analytics also uses cookies to collect standard internet log information and visitor behaviour information in an anonymous form. The anonymous information generated by Google Analytics cookies about your use of our website (including your IP address) is transmitted to Google and compiled into aggregated statistical reports that are used by PBI to optimize website content. You may control your advertising preferences or opt-out of certain Google advertising products (i.e. the Google Analytics cookies) by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>.

Passively Tracked Information we collect when you interact with the Site or the Software and Hardware while participating in the Service may be Personal Information (e.g., if you are logged in or if the information

otherwise can be used to identify you or linked to you) or it may be anonymous. We do not take active steps to link Site, Software or Hardware to you (i.e. Anonymous Information).

How We Use Passively Tracked Information

We will use Passively Tracked Information to:

- Market our Service and those of third parties we believe may be of interest to you.
- Respond to your requests, resolve disputes and/or troubleshoot problems.
- Improve the quality of the Site and the Service.
- Communicate with you about the Site and the Service.

How We Use Anonymous Information

We may use your Anonymous Information created by us without restriction. We may use search content or Anonymous Information to analyze usage patterns so that we may enhance the Site or the Service and improve our internal operations and the content of our Software, notify visitors to our Site about updates to our Site or Service, and improve the efficacy of our content and advertisements that appear on the Site.

Mobile Phone Providers

Our Hardware and Software is designed for use with certain approved mobile phones or other electronic devices. In addition to receipt and transmission of data in connection with your use of our Hardware and Software, you may also elect to receive text messages or emails that will be routed to your mobile phones or other electronic devices. Each mobile phone carrier will have their own privacy policies for their plan members. PBI recommends that you review the privacy policies of your specific carrier and that you exercise caution in the types of information you share with PBI utilizing mobile phones and other electronic devices. PBI is not responsible for the privacy policies of your mobile phone carrier.

4. How We Protect Your Information.

We maintain reasonable administrative, technical, and physical safeguards designed to protect the information that you provide on our Site and in connection with the Service. We also use encryption of the data at rest and physically separate Personal Information from health information. However, no security system is impenetrable, and we cannot guarantee the security of our website, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the Internet, and we are not liable for the illegal acts of third parties such as criminal hackers.

5. Retention and Storage of Personal Information.

PBI keeps your Personal Information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the purpose for which it was collected and the nature of the information.

Where we have a contractual relationship with an organization, we will store such Personal Information throughout the course of our contractual business relationship and for a reasonable time following its end (linked to the applicable legal time limit for bringing claims under contract).

Where we are dealing with prospective customers or partners, we will store this information only for so long as we reasonably believe that the individual and/or his/her organization may be considered a business prospect, not to exceed one (1) year following the last communication received from that individual. If the individual and/or his/her organization becomes a customer or business partner, his/her Personal Information is treated as described above.

Where such Personal Information is no longer required for the purposes for which it was collected, PBI will destroy, delete, erase, or convert it into an anonymous form.

PBI may use service providers located outside of Canada, and, if applicable, your Personal Information may be processed and stored in a foreign jurisdiction, including the United States of America and/or the European Economic Area, and therefore may be subject to access or disclosure to foreign law enforcement authorities under the laws of those jurisdictions. You may request information from PBI on the jurisdictions in which PBI and/or its service providers will process and store Personal Information. Where we transfer, store, and process your Personal Information outside of Canada, we seek to ensure appropriate safeguards are in place to maintain an adequate level of data protection.

6. Access to and Correction of Personal Information.

PBI permits a reasonable right of access and review of Personal Information held by us. You can contact us at anytime at info@precisionbiomonitoring.com if you would like to change or update your Personal Information. To guard against fraudulent requests for access, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.

In some cases, we may not be able to provide you with access to your Personal Information, for example, where an exception to access is permitted or required by applicable law.

7. Links To Third Party Products and Services.

While you are visiting or using our Site, you may be provided with links to other websites not owned or controlled by PBI. These websites, information they provide, and products and services offered there are provided by independent companies not owned or operated by PBI. If you click on one of the presented offers, you will be redirected to the website of the third party, and any information you provide in response to the offer will be collected and used by the third party and not by PBI. Information you provide to the third party and any dealings you have with third parties will be governed by the privacy and other policies of that third party. PBI cannot be responsible for the privacy practices of the other sites. A link to a non-PBI website does not constitute or imply endorsement of PBI.

8. Use of Electronic Mail.

PBI may provide email links in any portion of the Service to further facilitate communication between PBI and you. Information collected through email may be shared with our customer service group, employees or other third parties that perform services on our behalf. Unless otherwise noted, email is not a completely secure and confidential means of communication. Non-encrypted email communications may be accessed and viewed by other Internet users without your knowledge and permission while in transit to us.

9. Effective Date, Amendments.

This Privacy Policy was last updated on February 4, 2021.

We may change this Privacy Policy from time to time in the future. We will post any revised version of the Privacy Policy on this page. If we make any material changes to it, we may also send you notice to the last email address you have provided to us. Continued use of our Hardware, Software, Site and Service following notice of such changes will indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

10. Changes to this Privacy Policy and How to Contact Us.

We review and may revise this Privacy Policy from time to time. We will indicate the date the most recent changes were published on this page.

Please feel free to contact us with any comments, questions, complaints, or suggestions you might have regarding our Privacy Policy. You may send us an e-mail at PBI [at] precisionbiomonitoring.com or write to us at:

info@precisionbiomonitoring.com

If you believe we or any company associated with us has misused any of your information, please contact us immediately and report such misuse. You may call us at +1 (888) 444-7702.

PBI will work with our customers, business partners and Users to resolve any concerns you may have with this Privacy Policy or our privacy practices. If we are unable to resolve your privacy concerns, you have the right to complain to the [Office of the Privacy Commissioner of Canada](#).

You may also direct your inquiry and/or complaint to the relevant Information and Privacy Commissioner in your jurisdiction of residence.

PBI GDPR COMPLIANCE STATEMENT

Application

This section of our privacy policy applies to Personal Information which we hold in connection with our business operations in the EU and to which the GDPR applies.

General

PBI endeavors to comply fully with the requirements of the GDPR. Personal Information of EU individuals will be treated in accordance with this Privacy Policy except as otherwise required by the GDPR. If there is any conflict between the requirements of the GDPR and the privacy practices described above, PBI will abide by the GDPR in those circumstances.

Where it applies, and in addition to the information provided above, the GDPR requires PBI to inform you about: (a) the types of Personal Information that we collect; (b) the purposes of our processing and its legal basis; (c) who we may disclose your Personal Information to; (d) if we transfer your Personal Information to organizations outside the EU; (e) how long we may keep it for; and (f) your rights in relation to your Personal Information that we hold.

What Personal Information do we hold about you and what do we hold it for?

We collect Personal Information in two main categories and use it, as described below:

INFORMATION OF CUSTOMERS AND BUSINESS PARTNERS:

Type of Information	Purpose	Legal Basis
Contact information of personnel of our business customers and business partners.	Conducting our business relationship, performing contractual obligations and providing support regarding our customers' use of our products and services.	Our legitimate business interests as a vendor or service provider to manage our relationship. Where relevant, performance of our contract with you.
Personal Information of our prospective business customers and business partners during negotiations of business relationships and contract negotiations.	Communicating with these individuals as necessary to conduct such negotiations.	Our legitimate business interests as a prospective vendor or service provider and/or prospective contract partner.

- Where we have a contractual relationship with an organization, we will store this information throughout the course of our contractual business relationship and for a reasonable time following its end (linked to the applicable legal time limit for bringing claims under the contract).
- Where dealing with prospective customers or partners, we will store this information only for so long as we reasonably believe that the individual and/or his/her organization may be considered a business prospect, not to exceed one (1) year following the last communication received from that individual. If the individual and/or his/her organization becomes a customer or business partner, his/her Personal Information is treated as described above.

MARKETING INFORMATION:

Type of Information	Purpose	Legal Basis
Personal Information regarding personnel within organizations to whom PBI wishes to market its products and services.	Sending marketing and business development communications to individuals.	Our legitimate business interests as a prospective services provider.
We may receive that information either directly or from third parties.		We may also rely on your consent where you have provided it to us.
This information may include names, email and postal addresses, phone numbers, organization name, job title and information regarding the		

individual's organization, such as the organizations business needs that may indicate why PBI's products and services would be beneficial or desirable.

Personal Information of our prospective business customers and business partners during negotiations of business relationships and contract negotiations.	Communicating with these individuals as necessary to conduct such negotiations.	Our legitimate business interests as a prospective vendor or service provider and/or prospective contract partner.
---	---	--

- Where we have obtained Personal Information from a third party, we will endeavor to comply with applicable notice provisions required by the GDPR (Article 14) to inform individuals that we have received their information from third-party sources.
- We will store Personal Information for marketing purposes only for so long as we reasonably believe that the individual remains a legitimate business prospect, not to exceed one (1) year following the last communication received from that individual.
- PBI also honors all opt-out requests receiving from individuals to whom we send marketing communications. Within our marketing emails, we provide simple and easy-to-follow instructions that inform individuals how to opt-out from future marketing emails, and we remove the Personal Information from our marketing lists regarding individuals who follow those opt-out procedures.

Who may we disclose your Personal Information to?

You agree that we may share your Personal Information with:

- our business partners, suppliers, and sub-contractors for the performance of any contract we enter into with you, for example we engage third parties to help deliver our services, to send you marketing and surveys and for data analysis.
- other professional advisers (including accountants and lawyers) that assist us in carrying out our business activities.
- police and other law enforcement agencies in connection with the prevention and detection of crime.
- third parties if we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our clients, employees or other third parties.

We may also disclose your Personal Information to other third parties, for example:

- if we sell or buy any business or assets, we may disclose your Personal Information to the prospective seller or buyer of such business or assets.
- if we or substantially all our assets are acquired by a third party (or are subject to a reorganization within our corporate group), Personal Information held by us will be one of the transferred assets.

Where will we transfer your Personal Information?

We will process your Personal Information both within and outside the European Economic Area (EEA). Where we transfer personal data outside of the EEA, we will implement appropriate and suitable safeguards to ensure that such Personal Information will be protected as required by applicable data protection law.

These measures generally include either:

- transferring Personal Information to countries that have been deemed to provide an adequate level of protection for Personal Information by the European Commission under the GDPR (Article 45(1)).
- transferring Personal Information where the recipient has agreed to a European Commission approved data transfer agreement in the form of the standard contractual clauses under the GDPR (Article 46(2)); or
- transferring Personal Information where the recipient is Privacy Shield certified in the USA.

Your rights

Where your Personal Information is processed in connection with our operations in the EU, the GDPR provides you certain rights with respect to your Personal Information.

These rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights.

SUMMARY OF YOUR RIGHTS

Right	Description
	You have the right to receive a copy of your Personal Information that we hold about you, subject to certain exemptions.
Right of access to your personal information	Any access request is free of charge. We may require further information to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific Personal Information you require).
Right to rectify your Personal Information	You have the right to ask us to correct your Personal Information that we hold where it is incorrect or incomplete.
Right to erasure of your Personal Information	You have the right to ask that your Personal Information be deleted in certain circumstances. For example (i) where your Personal Information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal

	<p>ground for which we rely on for the continued use of your Personal Information; (iii) if you object to the use of your Personal Information (as set out below); (iv) if we have used your Personal Information unlawfully; or (v) if your Personal Information needs to be erased to comply with a legal obligation.</p>
Right to restrict the use of your Personal Information	<p>You have the right to suspend our use of your Personal Information in certain circumstances. For example (i) where you think your Personal Information is inaccurate and only for such period to enable us to verify the accuracy of your Personal Information; (ii) the use of your Personal Information is unlawful and you oppose the erasure of your Personal Information and request that it is suspended instead; (iii) we no longer need your Personal Information, but your Personal Information is required by you for the establishment, exercise or defense of legal claims; or (iv) you have objected to the use of your Personal Information and we are verifying whether our grounds for the use of your Personal Information override your objection.</p>
Right to data portability	<p>You have the right to obtain your Personal Information in a structured, commonly used and machine-readable format and for it to be transferred to another organization, where it is technically feasible. The right only applies where the use of your Personal Information is based on your consent or for the performance of a contract, and when the use of your Personal Information is carried out by automated (i.e. electronic) means.</p>
Right to object to the use of your Personal Information	<p>You have the right to object to the use of your Personal Information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your Personal Information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your Personal Information for direct marketing purposes.</p>
Right to withdraw consent	<p>You have the right to withdraw your consent at any time where we rely on consent to use your Personal Information.</p>
Right to complain to the relevant data protection authority	<p>You have the right to complain to the relevant data protection authority (which is the Information Commissioner’s Office in the UK and the Data Protection Commissioner in the Republic of Ireland),</p>



where you think we have not used your Personal Information in accordance with data protection law.

If you have questions?

If you wish to contact PBI with questions regarding your GDPR rights, or if you wish to exercise your rights under the GDPR, you may email PBI at: info@precisionbiomonitoring.com.

REVISION HISTORY OF PRIVACY POLICY:

Revision	Effective Date	Author	Change Request #	Change Summary
1.00	February 4, 2021	Stephanie Gallone	N/A	First Release

REVIEWED AND APPROVED BY:

Name	Title	Role	Signature	Date
Stephanie Gallone	Director of Quality, Regulatory, and Clinical Affairs	Quality, Clinical Research and Regulatory Affairs		February 4, 2021
Bruce MacKay	Chief Operating Officer	Manufacturing	 <small>Bruce MacKay (Feb 5, 2021 08:09 EST)</small>	February 4, 2021