

## Personal Data Policy

### **1 INTRODUCTION**

Life Genomics AB (hereinafter referred to as "**Life Genomics**" or "**we**") is responsible for the processing of personal data you (as a patient) provide to any of our collaborating healthcare clinics in connection with your request that Life Genomics carry out any of the provided services: NIPT or Ziwig Endotest® (collectively referred to as "**Services**"). A prerequisite for being able to take part in the Services is that you provide requested personal data to Life Genomics. If you have any questions, please contact us. Information on how to contact us can be found under the heading "Contact details" below.

Life Genomics is also responsible for the processing of the personal data you submit as a current or potential customer or partner to Life Genomics and in the event of contact via email or contact form.

The purpose of Life Genomics' processing of Personal Data is to provide and implement the Services, as well as manage current customer relationships, collaboration partners and job seekers. The "**Personal Data Protection Policy**" is thus intended for data subjects to feel secure that we, as data processors and data controllers, handle Personal Data in accordance with applicable data protection legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, General Data Protection Regulation/GDPR ("**applicable Data Protection Legislation**"). The purpose of the Personal Data Protection Policy is also to minimize personal data incidents.

### **2 PERSONAL DATA PROCESSED**

"**Personal data**" refers to all information that can be directly or indirectly attributed to a living natural person. In the Services, there may be processing of personal data relating to first and last name, telephone number, address, zip code, email address, social security number, age, height, and weight. For those who live with protected identities, or simply do not want to disclose their identity, Life Genomics accepts "Jane Doe" as first and last name and only date of birth (not social security number) as patient identifiers. This takes place directly at the clinic, which in these cases only provides Life Genomics with limited personal data as an identifier.

In customer relations and among collaboration partners, there may be processing of personal data relating to first and last name, telephone number, address, postal code and email address.

In connection with email contact, there may be processing of personal data. When applying for a job, personal data may appear in documents such as personal letters and CVs. In this category, Life Genomics strives to request as little personal data as necessary.

## Personal Data Policy

### **3 SENSITIVE PERSONAL DATA**

**"Sensitive Personal Data"** is such data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as Personal Data relating to health or sexual life. Information about health can be, for example, sick leave, pregnancy, genetic information, and doctor's visits.

Within the scope of the Services (NIPT), we may process Sensitive Personal Data relating to current pregnancy, test results, IVF/egg donation as well as voluntarily provided information about pregnancies and patient history.

Within the framework of customer relations and collaborative partners, Life Genomics strives not to handle any Sensitive Personal Information.

Within the framework of email contact, Sensitive Personal Data is prompted to not be submitted. However, there is an imminent risk that Personal Data specified in a personal letter or CV may create Sensitive Personal Data. Therefore, these documents are always handled according to this principle; that they contain Sensitive Personal Data.

### **4 LEGAL BASIS FOR PROCESSING**

#### **- Fulfillment of agreements**

For people employed by companies with a current customer relationship or partnership with Life Genomics, as well as when ordering Services, personal data may be processed regarding the fulfillment of agreements.

#### **- Legal obligation**

For people employed by companies with a current or historical customer relationship or partnership with Life Genomics, personal data may be processed regarding legal obligations. Personal Data may need to be saved for a fixed period, to meet the Accounting Act's requirements for traceability.

#### **- Consent**

The purposes of the processing of Personal Data with the legal basis of consent are attributable to Life Genomics being able to provide the Services. As a starting point, Life Genomics processes your Personal Data only if you have given consent. Your consent is obtained in connection with your acceptance of the Services, which means that you agree to Life Genomics using and processing your Personal Data and Sensitive Personal Data in accordance with what is described in this Personal Data Protection Policy. Personal data is necessary to administer, process, assess risk and make calculations within the framework of the provision of the Services. The personal data is also used for the purpose of drawing up a report based on the results of the Services which is then sent to you.

## Personal Data Policy

You can withdraw your consent at any time. If you withdraw your consent, it may mean that the Services can no longer be provided to you. You withdraw your consent by contacting Life Genomics' data protection officer (see "Contact details" below). Personal data may also be processed if this is necessary to fulfill the agreement regarding the Services with you after a balance of interests.

### - **Balance of interests**

With regard to email contact, Life Genomics assumes that incoming email comes from people interested in our Services, a new customer or job seeker. Thus, Life Genomics' balance of interests is that the interest in processing Personal Data is legitimate and outweighs the persons own interest in protection of their Personal Data. For contact via [info@lifegenomics.se](mailto:info@lifegenomics.se), an automatic reply with a hyperlink to our Personal Data Protection Policy is sent. For contact via contact forms from the company's websites, there is a hyperlink to this Personal Data Protection Policy, which the user must approve before the form is submitted.

For people employed at companies that have a current customer relationship with Life Genomics, we will process your personal data for direct marketing as we consider this a legitimate interest. If you object to this treatment, please contact us, whereupon the treatment ends. Life Genomics will also process your personal data to prevent fraud as this constitutes a legitimate interest.

## **5 INFORMATION FROM OTHERS**

In some cases, we may complete Personal Data provided by you with information provided by public sources. Life Genomics may also receive Personal Data from third parties to be able to provide the Services. In this case, a prior consent from you is required.

## **6 INFORMATION TO OTHERS**

Life Genomics is part of GenePlanet d.o.o. (33554030) with its registered office at Cesta na Poljane 24, 1000 Ljubljana, Slovenia. GenePlanet has full transparency in Life Genomics operations, meaning data will be shared as necessary.

Life Genomics will not, without your permission, disclose your Personal Data to others in another way than what follows from the Personal Data Protection Policy. Life Genomics will not forward your Personal Data to third parties for marketing purposes.

Life Genomics may employ third parties for services in connection with the Services. Third parties may handle Personal Data and sometimes need limited access to Personal Data collected for the Services. We will always strive to limit such access to Personal Data and only share information that is reasonably necessary for third parties to perform their work or provide their services. We

## Personal Data Policy

require third parties to (i) protect your Personal Data in accordance with the Personal Data Protection Policy (ii) not use or disclose your Personal Data for any purpose other than providing the Services (iii) assure you that this transfer takes place in accordance with applicable Data protection legislation and that a data processing agreement (DPA) has been entered into with a third party regarding personal data processing.

Here follows a list of third parties who, in accordance with above, may receive Personal Data:

- Centuri AB (556558-6210)  
Kungsholmsgatan 21, 112 27 Stockholm, Sweden
  - o Within the framework of document management of customer information (not patient data)
- CompuGroup Medical LAB AB (556610-5564)  
Cirkelgatan 14, 781 72 Borlänge, Sweden
  - o Provides the laboratory information system CGM ANALYTIX, within the framework of all Services
- GenePlanet d.o.o.(3277062000)  
Cesta na Poljane 24, 1000 Ljubljana, Slovenia
  - o Within the framework of analysis of NIPT and carrier screening
- InfoSolutions Sverige AB (556747-5883)  
Kista Science Tower, 164 51 Kista, Sweden
  - o Within the framework of the electronic referral and response system LabPortalen
- Nomnio d.o.o. (6324282000)  
Tržaška cesta 85A, 2000 Maribor, Slovenia
  - o Within the framework of electronic referral and response system to NIPT
- Roche Diagnostics Scandinavia AB (556067-8194)  
Box 1228, 171 23 Solna, Sweden
  - o Within the framework of technical support of Harmony NIPT
- Ziwig Lab (952 130 664)  
Msp Les Thermes 465 Avenue des Thermes, 40180 Tercis-les-Bains, France
  - o Within the framework of analysis of Ziwig Endotest
- Microsoft Sharepoint
  - o Within the framework of data storage  
*Microsofts' Terms and Conditions apply instead of DPA*

## **Personal Data Policy**

If Life Genomics is subject to a reorganization, merger or sale, Life Genomics may transfer Personal Data to the relevant third party, provided that the third party undertakes to process Personal Data in accordance with the Personal Data Protection Policy.

### **7 TRANSFERS TO THIRD COUNTRIES**

Life Genomics will not transfer Personal Data to third countries (i.e., countries outside the EU/EEA) without your prior consent. For Life Genomics to be able to provide you with the Services, it may in some cases be required that Personal Data, referrals, and samples, be transferred to third countries. Should such a transfer of Personal Data be necessary, consent will be obtained from you. In case of consent, see "Information to others" above, for the requirements we place on third parties.

### **8 CHANGES IN PERSONAL DATA PROTECTION POLICY**

Life Genomics reserves the right to revise the Personal Data Protection Policy from time to time. The date of the last change is indicated in the header of the document as "Valid From". If Life Genomics makes any changes to the Personal Data Protection Policy, Life Genomics will publish these changes at <http://www.lifegenomics.se/om-oss/personoppgagdispolicy>. You are advised to read the Personal Data Protection Policy regularly to pay attention to any changes. If Life Genomics changes the Personal Data Protection Policy in a way that is materially different from what was stated when your consent was collected, Life Genomics will notify you of these changes and, if necessary, obtain new consent to Life Genomics' personal data processing.

### **9 HANDLING OF YOUR PERSONAL DATA**

Life Genomics stores your personal data on its own, secure servers or on secure servers of third-party cloud services to support Life Genomics' business operations.

Your Personal Data will not be stored for longer than is necessary with regards to the purposes of the processing and we will delete Personal Data in a manner that follows from applicable legislation. How long Personal Data is stored depends on which Personal Data it is and the purpose of its processing. The data you provide to Life Genomics will be deleted according to the principles below and, in some cases, for a period that is necessary and supported by law.

For data subjects employed by companies with a current customer relationship with Life Genomics, we will generally delete personal data when we receive an email or call where we are informed that the person in question has terminated their employment. However, to comply with the Accounting Act, Life Genomics may need to save customer data for seven (7) years to be able to substantiate documentation related to the accounting.

## Personal Data Policy

For data subjects who have consented to Life Genomics Services, Life Genomics will generally store:

- a) data linked to the Services, for at least one (1) year but a maximum of two (2) years
- b) signed paper referrals and order forms for seven (7) years physically, and four (4) years through network storage
- c) results for at least four (4) years
- d) invoicing documents for seven (7) years
- e) log sheet for deletion of test results for four (4) years

Regarding incoming emails, it is assessed how personal data may be processed, and what legal support we have for the continued processing. Personal data that may be processed is transferred to Centuri or stored in Sharepoint, after which emails are deleted.

For data subjects who have applied for employment with Life Genomics, personal data will generally be deleted (in accordance with the law) two (2) years after the end of recruitment. This as evidence if another job seeker feels discriminated during the recruitment process. If Life Genomics wishes to save personal data for longer than two (2) years to accommodate future recruitment, a written consent is requested from the candidate in which the applicant's active choice is stated. The applicant can withdraw consent at any time.

## **10 YOUR RIGHTS**

You have the right to request a so-called register extract to find out which (if any) data about you that Life Genomics handles. You also have the right to have incorrect information corrected and, in some cases, to have your personal data restricted or deleted. You also have the right to object to the processing of your Personal Data and to have your Personal Data transferred to another personal data controller.

To request register extracts, correction, limitation or deletion of personal data, you must send us a request by letter. The letter needs to contain your request in free text, for example: "I request access to my personal data that is processed at Life Genomics". The letter must contain first name, last name, social security number, telephone number, email address, postal address, postal code and a copy of your ID. Note that your address must agree with the national population register for us to proceed. This is since our reply needs to be sent to your registered address. The letter needs to be signed with place, date, signature and name clarification. The postal address for Life Genomics can be found below under "Contact details".

## Personal Data Policy

### **11 COOKIES**

We use cookies to enhance your experience on our websites. The following cookies are used:

#### <http://fostertest.se/>

\_gid - google analytics cookie, distinguishes users, expiration time 24 hours.

\_ga - google analytics cookie, distinguishes users, expiration time 2 years

\_gat - google cookie, used to limit the number of requests that must be made, expiration time 1 minute.

\_gcl\_au - google cookie, retrieves information from ads and clicks so that conversions can be attributed outside the landing page.

#### <http://nipt.se/>

\_gid - google analytics cookie, distinguishes users, expiration time 24 hours.

\_ga - google analytics cookie, distinguishes users, expiration time 2 years.

\_gat - google cookie, used to limit the number of requests that must be made, expiration time 1 minute.

#### <http://www.lifegenomics.se/>

\_gat - google cookie, used to limit the number of requests that must be made, expiration time 1 minute.

### **12 SAFETY**

Life Genomics has taken appropriate technical and organizational measures to protect Personal Data against loss, misuse, unauthorized access, disclosure, alteration, and destruction. To ensure that Personal Data is processed in a safe and confidential manner, Life Genomics uses data networks that are protected from intrusions with, among other things, firewalls, and password protection according to industry standards.

To ensure the integrity of the Personal Data you provide, encryption technology can be used when transferring Personal Data from the Internet to Life Genomics' servers.

Life Genomics' employees and suppliers are bound by confidentiality agreements and are obliged to follow Life Genomics' rules for information and IT security, the Personal Data Protection Policy and internal regulations that further regulate the processing of Personal Data.

### **13 COMPLAINTS**

If you have a complaint regarding our processing of your Personal Data, you have the option of filing a report with the Swedish Authority for Privacy Protection (IMY).

## Personal Data Policy

### **14 CONTACT DETAILS**

For questions about the Personal Data Protection Policy or regarding Life Genomics' processing of Personal Data, contact:

Life Genomics, CRN 556993-1891  
Odinsgatan 28  
SE-411 03 Göteborg  
+46 708-11 21 52  
[info@lifegenomics.se](mailto:info@lifegenomics.se)

Data Protection Officer  
Marcus Hanaeus  
[marcus@lifegenomics.se](mailto:marcus@lifegenomics.se)