

## PRIVACY POLICY

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Smart EpiGenetX, SRL ("Smart EpiGenetX") is committed to maintaining the privacy and security of your personal information, and we appreciate that health information is particularly sensitive. This Privacy Policy applies to the Smart EpiGenetX website at [www.genetx.eu](http://www.genetx.eu) (the "Website") and Smart EpiGenetX's mobile application (the "Mobile App"), both of which offer Smart EpiGenetX's nutrition recommendation plan (the "Program"). Smart EpiGenetX respects the privacy of its Website visitors ("Visitors"). This Privacy Policy discloses Smart EpiGenetX's information collection and dissemination practices in connection with the Website and the Mobile App (collectively, the "Services"), and applies solely to the information that we collect through the Services. This Privacy Policy does not address personal information that you provide to us in other contexts (e.g., through a business relationship not handled through the Website or the Mobile App).

Our Terms and Conditions form explains that, by using our Website or Mobile App and signing up for the Program, you are allowing us to collect, use, and process information that could be used to identify you, either alone or in combination with other information ("Personal Information") according to the provisions set forth in that document and this Privacy Policy.

### Acceptance of privacy policy

By clicking your acceptance and using the Services, you signify your acceptance of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Services. Your continued use of the Services following the posting of changes to these terms will mean that you accept those changes.

### Personal information provided by you

In the course of your relationship with Smart EpiGenetX, we collect several types of Personal Information. We collect such information from you when you purchase the Services, use the Website or the Mobile App, create a personal account, complete surveys or forms, or when you communicate with us, or request information from us. Personal Information collected online may be combined with Personal Information collected offline. We collect five primary types of Personal Information through the Services, the Website, and the Mobile App.

Registration Information is information that we collect from you when you purchase or sign up for the Smart EpiGenetX Services. Examples of such information include your name, age, zip code, and contact information, such as an email address. We also collect your credit card information to process payment for the Program.

Self-Reported Information includes information you provide in the Smart EpiGenetX Program settings, such as race, gender, body weight, etc.

User Content is all information other than test information or self-reported information provided by the users of the Smart EpiGenetX Services and transmitted, whether publicly or privately, to Smart EpiGenetX. User content may include data, text, software, music, audio, photographs, graphics, video, messages, or other materials. For example, user content includes posts made to the Smart EpiGenetX community forums or emails to customer support.

Web Behavior Information is information on how you use the website (e.g., browser type, domains, page views) collected through log files, cookies, and web beacon technology.

#### Use and disclosure of personal information

Smart EpiGenetX will not sell, rent, license, or trade your Personal Information with third parties for their own direct marketing use unless we receive your express consent to do so. Unless you give us permission to do so, Smart EpiGenetX will not share your Personal Information other than as specified in this Privacy Policy.

We may use the information we collect from you when you sign up, register, purchase products or Services, respond to a survey or marketing communication, surf the Website, use the Mobile App, or use certain other Services in the following ways:

To personalize your Website or Mobile App experience and to allow us to deliver the type of content and product offerings in which you are most interested.

To allow us to better service you in responding to your customer service requests.

To quickly process your transactions.

To enroll you in a consumer research or other panel.

To administer a promotion, survey or other Website or Mobile App feature.

### **How we use registration information**

We use your registration information to authenticate your Website and Mobile App visits and usage, to enable your purchases, to communicate with you about information, services, and products that you have requested, and to manage and improve our Website, Mobile App, software, and Services.

We may also use this information to offer you services and products that may be of interest to you or invite you to participate in specific research projects. We give you the opportunity to opt out of optional communications, either through the Smart EpiGenetX Services or by contacting us at [office@genetx.eu](mailto:office@genetx.eu)

### **How we use biomarker test and self-reported information**

We use your test information and self-reported information to provide you with Smart EpiGenetX recommendations, customize your user experience, and enhance our Services. Self-reported information is used to customize your user experience. We may include your anonymized test information and self-reported information in disclosures to third parties for the purpose of research or other applications, but no identifying information will be shared without your prior knowledge and consent. Smart EpiGenetX research is intended to advance wellness and nutrition knowledge and to create, commercialize, or undertake activities toward the practical applications of this learning to the improvement of health. Our research partners may include commercial or non-profit organizations that conduct or support medical research or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions.

### **Disclosures to third parties assisting in our operations.**

Smart EpiGenetX may share your Personal Information under confidentiality agreements with other companies that work with, or on behalf of, Smart EpiGenetX to provide products and services, such as a cloud hosting service or a document storage company. These companies may use your Personal Information to assist Smart EpiGenetX in its operations. However, these companies do not have any independent right to share this information.

### **Disclosures under special circumstances.**

We may provide information about you to respond to subpoenas, court orders, legal process or governmental regulations, or to establish or exercise our legal rights or defend against legal claims. We believe it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.

### **Business transfers.**

We may share your Personal Information with other business entities in connection with the sale, assignment, merger or other transfer of all or a portion of Smart EpiGenetX's business to such business entity. We will require any such successor business entity to honor the terms of this Privacy Policy.

Each time a visitor comes to a Website, Smart EpiGenetX collects some information to improve the overall quality of the visitor's online experience.

### **Aggregated data.**

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Smart EpiGenetX collects aggregate queries for internal reporting and also counts, tracks, and aggregates the visitor's activity into Smart EpiGenetX's analysis of general traffic-flow at the Website and in the Mobile App. To these ends, Smart EpiGenetX may merge information about you into aggregated group data. In some cases, Smart EpiGenetX may remove personal identifiers from Personal Information and maintain it in aggregate form that may later be combined with other information to generate anonymous, aggregated statistical information. Such anonymous, group data may be shared on an aggregated basis with Smart EpiGenetX's affiliates, business partners, service providers and/or vendors; if it does so, Smart EpiGenetX will not disclose your individual identity.

### **Information we automatically collect from you.**

We may automatically collect information about your interactions with the Website and the Mobile App and may combine this information with other information about you in order to customize your online experience with us. The information we automatically collect may include your IP address, referring URLs, browser and device characteristics, browsing behavior (e.g., date and time of visit, length of visit, clicks on product information or other content), and your response to our email campaigns (e.g., whether and when you open our email, the links you click). We may use cookies, and other similar industry standard technologies to capture this information. A "cookie" is a small amount of data that is sent to your browser from a web server and stored on your computer or device. Among other things, cookies allow us to facilitate the administration and improve the effectiveness of the Website and the Mobile App as well as further tailor and enhance your experience to your interests. You may set your browser to decline cookies. If you do so, you may not be able to fully experience certain interactive features of our Sites.

We may also use third party analytics companies, such as Google Analytics, to analyze the usage of our Website and Mobile App for internal purposes. These analytics companies may use cookies and other tracking mechanisms to collect data about how you use the Services and provide us with aggregate information on such usage, which helps us improve the performance of our Sites.

### **Links to other sites**

The Website and Mobile App may contain links to other sites, including to those of our affiliates or third-party entities that may contain a different privacy statement. These sites may also refer you back to our Website or Mobile App. We recommend that you read the privacy statements of each site you visit to understand the site's privacy practices. We are not responsible for the privacy practices of sites and apps that do not link to this Privacy Policy.

### **Security**

Smart EpiGenetX understands that storing our data in a secure manner is essential. Smart EpiGenetX stores Personal Information and other data using industry standard physical, technical, and administrative safeguards to secure data against foreseeable risks, such as unauthorized use, access, disclosure, destruction or modification. Please note, however, that while Smart EpiGenetX has endeavored to create a secure and reliable Website and Mobile App for users, the confidentiality of any communication or material transmitted to/from the Website or Mobile App via e-mail cannot be guaranteed.

### **Response to "do not track" signals**

Some Internet browsers include the ability to transmit “Do Not Track” signals. Since uniform standards for “Do Not Track” signals have not yet been adopted, Smart EpiGenetX does not process or respond to “Do Not Track” signals.

### **Children’s privacy protection**

Smart EpiGenetX understands the importance of protecting children’s privacy in the interactive online world. This Website is not designed for, or intentionally targeted at, children under 18 years of age. It is not our policy to intentionally collect or maintain information about anyone under the age of 18. No one under the age of 18 should submit any Personal Information to Smart EpiGenetX or the Services.

### **Your privacy obligations**

Smart EpiGenetX gives you the ability to connect with other individuals who have Smart EpiGenetX accounts through our community forums and other sharing features. For some features, opt-out is required to avoid notifications. In addition, you may choose to disclose, through other means not associated with us, any part of your Personal Information to friends or family members, groups of individuals, third-party service providers, doctors or other health care professionals, or other individuals. We recommend that you make such choices carefully. Personal Information, once released or shared, can be difficult to contain. We will have no responsibility or liability for any consequences that may result because you have released or shared personal information with a third party.

Likewise, if you are reading this because you have access to the Personal Information of a Smart EpiGenetX customer through a multi-profile account, we urge you to recognize your responsibility to protect the privacy of that person. It is incumbent upon customers to share personal information only with people they know and trust. Users with multi-profile accounts should use caution in setting profile-level privacy settings. You are also responsible for maintaining the privacy of your Smart EpiGenetX user name and password. Please notify us immediately if you believe your Smart EpiGenetX user name, password or other Smart EpiGenetX account information may have been compromised.

### **Important notices to non – European Union residents**

It is important to note that the Website and Mobile App are operated in the Europe Union. If you are located outside of the European Union, please be aware that any Personal Information you provide to us will be transferred to the European Union. By using the Website or the Mobile App, and/or providing us with your Personal Information, you consent to this transfer.

### **Account closure and correcting your personal information.**

If you no longer wish to participate in our Services, you may close your account by sending a request to Customer Support at [office@genetx.eu](mailto:office@genetx.eu). When closing an account, we remove all test information within your account (or profile) within thirty (30) days of our receipt of your request. However, test information or self-reported information that you have previously provided and for which you have given consent to use will not be removed from ongoing or completed studies or business activities that use the information (such as anonymized statistical information). Our contracted testing laboratory may also retain your test information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited registration information related to your order history (e.g., name, contact, and transaction data) for accounting and compliance purposes.

If your Personal Information changes, you may correct or update your registration information via your profile page. You may also correct or reset self-reported information entered into a survey, form, or

feature indicated for Smart EpiGenetX research use by emailing a request to customer support at [office@genetx.eu](mailto:office@genetx.eu) and including the name of the specific survey, form, or feature.

### **Policy updates**

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This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. We display an effective date on the policy in the upper right corner of this Privacy Policy so that it will be easier for you to know when there has been a change. If we make any change to this Privacy Policy regarding use or disclosure of Personal Information, we will provide advance notice on this Website and in the Mobile App. Small changes or changes that do not significantly affect individual privacy interests may be made at any time and without prior notice.

### **Questions?**

If you have any questions about this Privacy Policy or about Smart EpiGenetX's handling of your information, please contact [office@genetx.eu](mailto:office@genetx.eu).