

# GENETIKAPLUS PRIVACY POLICY

Last Updated: December 20, 2021

In order to ensure transparency and give you more control over your Personal Information, this privacy policy (“**Privacy Policy**”) governs how we, GenetikaPlus Ltd. (together, “**Genetikaplus**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you browse or visit our website, <https://www.genetikaplus.com/> (“**Website**”);
- (ii) When you make use of, or interact with, our Website
  - a. When you subscribe to our distribution list(s) / newsletters(s) / blog(s)
  - b. When you contact us (e.g., keep in touch)
- (iii) When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data
- (iv) When we use the Personal Data of our service providers (e.g. contact details)
- (v) When we use the Personal Data of our customers (e.g. contact details)

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “**Personal Data**” or “**Personal Information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and therefore, we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If we implement significant changes to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

## 1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific Personal Data we collect	Why is the Personal Data collected and for what purposes?	Legal basis (GDPR only, if applicable)	Third parties with whom we share your Personal Data	Consequences of not providing the data
<b>When you make use of, or interact with, our Website</b>				
<b>When you subscribe to our distribution list(s) / newsletters(s) / blog(s)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Category (e.g., patient, business partner, amongst others)</li> </ul>	<ul style="list-style-type: none"> <li>• To add you to Genetikaplus’ mailing list, to send you information that we believe that could be interesting for you (for example, information about clinical trials).</li> <li>• To send you marketing communications/newsletters</li> </ul>	Consent	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• MailChimp (newsletter provider)</li> <li>• DropBox (cloud)</li> <li>• Microsoft One Drive (cloud)</li> <li>• Wix (website provider)</li> </ul>	Cannot add you to our mailing list  Cannot send you marketing communications
<b>When you contact us (e.g. keep in touch)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To process your request</li> <li>• To assist you with your inquiry</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  Legitimate interest (e.g. respond to an inquiry sent by you)	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• MailChimp (newsletter provider)</li> <li>• DropBox (cloud)</li> <li>• Microsoft One Drive (cloud)</li> <li>• Wix (website provider)</li> </ul>	Cannot process your request  Cannot assist you and respond to your inquiry
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To add you to Genetikaplus’ mailing list, to send you information that we believe that could be interesting for you (for example, information about clinical trials).</li> <li>• To send you marketing communications/newsletters</li> </ul>	Consent	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• MailChimp (newsletter provider)</li> <li>• DropBox (cloud)</li> <li>• Microsoft One Drive (cloud)</li> <li>• Wix (website provider)</li> </ul>	Cannot add you to our mailing list  Cannot send you marketing communications
<b>When you attend a marketing event and/or we exchange business cards and you provide us with your Personal Data</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Company name</li> <li>• Email address</li> <li>• Country</li> <li>• Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To establish a business connection</li> <li>• To send marketing communications</li> </ul>	Depending on the context, consent or legitimate interest (e.g. send you more information about Genetikaplus in certain B2B situations)	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• MailChimp (newsletter provider)</li> <li>• DropBox (cloud)</li> <li>• Microsoft One Drive (cloud)</li> </ul>	Cannot establish a business connection  Cannot send marketing communications
<b>When we use the Personal Data of our service providers</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Job position</li> <li>• Phone number</li> <li>• Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To contact our service providers</li> <li>• To perform/execute the agreement</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	3 <sup>rd</sup> party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• MailChimp (newsletter provider)</li> <li>• DropBox (cloud)</li> <li>• Microsoft One Drive (cloud)</li> </ul>	Cannot communicate with you  Cannot perform the agreement

		Legitimate interest (e.g. perform the contract, send contract-related communications)		
<b>When we use the Personal Data of our customers</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Company name</li> <li>• Email address</li> <li>• Country</li> <li>• Payment details</li> <li>• Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To provide our products and services</li> <li>• To perform the relevant agreement</li> <li>• To send you contract-related communications</li> </ul>	<p>Processing is necessary for the performance of a contract to which our customer is a party.</p> <p>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</p> <p>Legitimate interest (e.g. send you contract-related communications)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• MailChimp (newsletter provider)</li> <li>• DropBox (cloud)</li> <li>• Microsoft One Drive (cloud)</li> </ul>	<p>Cannot communicate with you</p> <p>Cannot provide the services</p> <p>Cannot perform the agreement</p>

Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your Personal Data and further use it for internal and external purposes, including, without limitation, to improve the services and for research purposes. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND RETAIN YOUR PERSONAL DATA

2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

2.2. **Retention of your Personal Data.** Your Personal Data will be stored until we delete the record and we proactively delete it or you send a valid deletion request, please note that in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

## 3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your information as follows:

- 3.1. With our business partners with whom we jointly offer products or services.
- 3.2. We may also share Personal Data with our affiliated companies about you.
- 3.3. To the extent necessary, with regulators, courts or competent authorities, to comply with all applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your Personal Data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.5. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign Personal Data in connection with the foregoing events, including, in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company; and/or
- 3.6. Where you have provided your consent to us sharing or transferring your Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

If you want to receive the list of the current recipients of your Personal Data, please make your request by contacting us at [info@genetikaplus.com](mailto:info@genetikaplus.com).

## 4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

4.1. **External transfers:** Where we transfer your Personal Data outside of EU/EEA (for example to third parties who provide us with services), we will generally obtain contractual commitments from them to protect your Personal Data. When Genetikaplus engages in such transfers of personal information, it relies on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR) (for example, when we access from Israel), or ii) Standard Contractual Clauses issued by the European Commission. Genetikaplus also continually monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.

## 5. YOUR PRIVACY RIGHTS

5.1 **Rights:** The following rights (which may be subject to certain exemptions or derogations), shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access Personal Data held about you. Your right of access is normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that it is inaccurate or misleading.
- You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
- You have the right to object to or to request restriction of the processing.
- You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at [info@genetikaplus.com](mailto:info@genetikaplus.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initial requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. **USE BY CHILDREN.** We do not offer our products or services for use by children and, therefore, we do not knowingly collect Personal Data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any Personal Data to us without involvement of a parent or a guardian. For the purposes of the GDPR, we do not intend to *offer information society services directly to children*. In the event that we become aware that you provide Personal Data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [info@genetikaplus.com](mailto:info@genetikaplus.com). We do not knowingly collect information from, and/or about children.

7. **LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS.** We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a "Third Party Service"). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. **CONTACT US.** If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [info@genetikaplus.com](mailto:info@genetikaplus.com).