

## Pheno.ai Privacy Policy

Pheno.ai, its subsidiaries, and affiliates (“**Pheno.ai**”, “**Company**” “**we**” or “**us**”) respects the privacy of the visitors on our website [[www.pheno.ai](http://www.pheno.ai)], (the “**Website**”) (“**User(s)**” or “**you**”). The Website's main goal is to provide general information regarding pheno.ai, updates regarding our operations in the fields of [*The Human Phenotype Project*] and to present relevant professional content. Therefore, our Website is of informative nature, and through it we collect only minimal personal data as described below.

This Privacy Policy applies exclusively to the usage of the Website and shall not extend to any other engagements between pheno.ai and the User. If the User is party to any other agreement with pheno.ai, other policies may apply.

“**Personal Data**” or “**Personal Information**” means any information that identifies or can be used, alone or together with other data, to identify an individual and any information deemed as personal information under applicable privacy laws. Please note that some provisions in this Privacy Policy only apply to individuals in certain jurisdictions. For example, the legal bases stated in section 1 below are only relevant to GDPR-protected individuals.

This Privacy Policy forms part of our Terms of Use which is available at [[www.pheno.ai](http://www.pheno.ai)] (“**TOU**”). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the TOU and other agreements applicable between us.

For the avoidance of doubt, you are not obliged to provide us with any Personal Information; using our Website and providing us with your information is solely at your discretion.

### 1. **What information we collect, why we collect it, and how it used.** We collect the following types of Personal Data from our Users in the following circumstances:

- 1.1. **When you use or interact with the Website**, we collect information related to the way you interact with the Website [e.g., determine general geolocation information (i.e., country) from which the Users are connected] and will use the Personal Data relating to such usage for the following purposes: operate the Website, enhance the User’s experience, provide and personalize our services or advertising efforts to our Users. Our legal basis for such processing is our legitimate interest, such as supporting and improving our services and Website.
- 1.2. **When you contact us**, you will be asked to provide us with the details such as your name, e-mail address, phone number, company name, the content of your message or any other information that you voluntarily decide to provide us with. Obviously, once we receive your details, our representative may contact you to complete the process and therefore, our representative may collect additional information from you. We process such Personal Data for the following purposes: Receive and process your request, customize your experience and support our Website and customer services, record keeping, provide our services. Our legal basis for such processing is the performance of a contract (i.e., any agreement between us) and our legitimate interests (e.g., to handle and keep record of requests).

We also collect Non-personal Information (defined below) for statistical and research purposes (e.g. learning about general preferences and user trends) and for customization and improvement of our Website, products, services and marketing efforts.

### 2. **THIRD PARTIES RECIPIENTS.** We share Personal Information only with the following recipients:

- 2.1. With our service providers/vendors such as our hosting providers, CRM tools, etc.

- 2.2. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 2.3. 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;
- 2.4. 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 your 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
- 2.5. 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).

For the avoidance of doubt, we may transfer and disclose Non-personal Information to third parties at our discretion, including statistical, analytical and research purposes and for customization, development and improvement of our Website, services, or marketing methods.

Non-Personal Information is any unconcealed information which does not enable identification of an individual User, and which is available to us while such User is using the Website (“**Non-personal Information**”).

**3. PRIVACY 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):

- 3.1. You have a right to access Personal Data held about you;
- 3.2. You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading, and 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 exercise or defense of legal claims. In any event, if you wish to delete or modify Personal Information, please contact us with adequate detail of your request through the “Contact Us” link in the Website and we will make reasonable efforts to modify or delete any such Personal Information pursuant to any applicable privacy laws.
- 3.3. You have the right to object, to or to request restriction, when we process your personal data based on our legitimate interests;
- 3.4. 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;
- 3.5. If applicable, you have the right to object to profiling;
- 3.6. In case we process your Personal Data based on your consent, 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, particularly 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;

- 3.7. You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements or other details may need to be partially redacted for reasons such as commercial confidentiality;
- 3.8. You have a right to lodge a complaint with your local data protection supervisory 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 contacting your local supervisory authority or relevant institution.

4. **RETENTION.** Your Personal Data will be stored until 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.

5. **CHILDREN DATA.** We only offer our Website and services to adult professional individuals and do not knowingly collect Personal Data from or about individuals under the age of eighteen (18).

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@pheno.ai](mailto:info@pheno.ai)].

6. **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 into our servers, or otherwise. As the security of information depends in part on the security of the 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.

7. **THIRD PARTY PRODUCTS.** We may enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us via our Website. We are not responsible for the privacy practices or the content of such third parties, so please be aware that they 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. **COOKIES AND OTHER TRACKING TECHNOLOGIES.** When you access or use the Website, we or our third party service providers may use industry-wide technologies such as "cookies" or other similar technologies which store certain information on your computer or device ("Cookies"), which will allow us to enable automatic activation of certain features and make your experience much more convenient and effortless. We or our authorized third party service providers may use both session cookies (which expire once you close the Website) and persistent cookies (which stay on your system until you delete them). It is easy to disable or delete Cookies, and most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you disable or erase cookies, your online experience may be limited.

9. **GOOGLE ANALYTICS.** The Website uses a tool called "Google Analytics" to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with Personal Information we collect. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy,

available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

10. **CROSS BORDERS DATA.** We store Personal data with the following storing companies, including [*Amazon web services*]. In order to operate the Website, we may transfer information collected about you, including Personal Information, to affiliated entities, or to other third party service providers (as provided herein) across borders and from your country or jurisdiction to other countries or jurisdictions around the world.
11. **UPDATES.** pheno.ai reserves the right to change this policy at any time, and if so, we will provide notice about the changes of this policy. Such updates will usually take effect within seven (7) days after such notice or update, however, in the event that the Privacy Policy should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by applicable law and without any prior notice.
12. **CONTACT US.** If you have any questions, concerns or complaints concerning this Privacy Policy or if you wish to exercise your rights, we encourage you to first contact us by using the “Contact Us” link on the Website or via [*info@pheno.ai*].

Last updated: January 17, 2023