



## **Prevensio Privacy Shield**

This policy is effective September 26, 2019

### **Summary**

Prevensio, Inc (“Prevensio”, “we”, “us”) carefully protects the confidentiality of Personal Data (defined below) provided to us by patients, employees, healthcare professionals and business partners. We value the trust placed in us by patients, our employees, healthcare professionals and business partners (“you”). We will not release Personal Data about you to third parties for purposes other than to provide services to which you have agreed, or to comply with applicable legal requirements. We are committed to upholding best practices in our use, collection, storage and disclosure of personal information.

Prevensio complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Prevensio commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to unresolved Privacy Shield complaints concerning data transferred from the EU and Switzerland. Prevensio has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

The US Department of Commerce has agreed on requirements that permit U.S. companies to satisfy the mandate under European law and Swiss law that adequate protection is provided to Personal Data transferred from the European Union, European Economic Area, or Switzerland to the U.S. For EU citizens’ personal data, these requirements are memorialized in the EU-US Privacy Shield Framework. For Swiss citizens’ Personal Data, these requirements are memorialized in the Swiss-U.S. Privacy Shield Framework.

This Prevensio Privacy Shield Policy (the “Policy”) sets forth the privacy principles that we follow with respect to Personal Data transferred from the European Union member countries and Switzerland to the United States of America.

### **Privacy Shield Principles**

Prevensio has committed to uphold the Privacy Shield principles and surrounding requirements of the framework. The principles are: Notice; Choice (Consent); Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability. For more information on the E.U.-U.S. Privacy Shield or to view our certifications, please visit <https://www.privacyshield.gov/>.



## **Scope of Individuals and Personal Data**

Prevenccio Privacy Shield Policy certification to the U.S. Department of Commerce confirms its adherence to that framework for E.U. personal information transferred to the U.S., in relation to patients, clinical research participants, employees, former employees, beneficiaries identified by employees, job applicants, healthcare professionals, other customers, and suppliers. Prevenccio limits its collection, processing and storage of personal information to situations where it has a legitimate business interest in the information.

## **Information About the Privacy Shield**

The Privacy Shield framework, which is jointly established by the European Commission and the U.S. Department of Commerce, allows companies such as Prevenccio to self-certify to the seven privacy principles and surrounding requirements of the framework for purposes of protecting and safeguarding personal data relating to residents of the European Union (E.U.) and European Economic Area (E.E.A.). In exchange for completing the requirements of the Privacy Shield framework, and committing to uphold those requirements, U.S.-based organizations such as Prevenccio are declared by the European Commission to have adopted 'adequate' privacy and security standards for that personal data. This means that they can receive E.U. or E.E.A. personal data without first having to fulfill another cross-border data transfer method as provided under the E.U. General Data Protection Regulation (GDPR) 2016/679, but must still fulfill the surrounding data protection requirements that apply to the data, for as long as it is under their custody or control.

## **Third-Party Transfers**

Prevenccio and its affiliates that have certified to the Privacy Shield entrust certain personal information pertaining to E.U. individuals to third-party partners who assist those companies with their business activities, or who have regulatory or legal oversight responsibilities in relation to certain business activities. Personal data may be transferred to clinical labs or other third parties for the purposes of determining clinical diagnosis of certain diseases. Where they do so, Prevenccio and its affiliates that have certified to the Privacy Shield take steps to ensure that the third parties entrusted with E.U. personal data uphold an equivalent level of protection for the data. Prevenccio and its affiliates that have certified to the Privacy Shield also understand that the company can be held responsible if its business partners entrusted with E.U. personal information violate those obligations.

## **Disputes**

In compliance with the Privacy Shield principles, Prevenccio and its affiliates that have certified to the Privacy Shield commit to resolve complaints about its collection or use of your personal information. E.U. individuals with inquiries or complaints regarding their Privacy Shield policies



or practices should first contact our Privacy Officer Grady Barnes at [gbarnes@prevencio.com](mailto:gbarnes@prevencio.com). In accordance with our Privacy Shield commitment, Prevenccio has adopted dispute resolution practices that are designed to evaluate and resolve any complaints or concerns about your privacy and its collection or use of your personal information within thirty (30) days of receipt.

### **Third-Party Dispute Resolution**

Prevenccio and its affiliates that have certified to the Privacy Shield have further committed to cooperate with the E.U. supervisory authorities with regard to unresolved Privacy Shield complaints, including those concerning human resources data transferred from the E.U. in the context of the employment relationship. If you do not receive timely acknowledgment of your

complaint from Prevenccio, or if the company has not addressed your complaint to your satisfaction, you have the right to contact the E.U. supervisory authorities more information or to file a complaint. The services of E.U. supervisory authorities are provided at no cost to you.

### **Regulatory Oversight and Enforcement**

Prevenccio and its affiliates that have certified to the Privacy Shield are also subject to investigatory and enforcement authority of the U.S. and E.U. agencies who oversee the Privacy Shield framework, namely the U.S. Federal Trade Commission and the relevant E.U. supervisory authorities. Individuals also have a right to file a complaint with these oversight agencies, particularly if you believe your complaint is not satisfactorily resolved through Prevenccio.

### **Right to Binding Arbitration**

In accordance with the Privacy Shield framework, E.U. individuals may be able to invoke binding arbitration before a Privacy Shield Panel if they believe that their claim has not been handled by the company in a satisfactory manner.

### **Rights of Individuals to Access Their Data**

E.U. individuals have the right to access personal information about them, and to limit use and disclosure of their personal information. With its Privacy Shield certification, Prevenccio and its affiliates that have certified to the Privacy Shield have committed to respect and uphold those rights. Should you wish to exercise those rights, the company requests that you contact our Privacy Officer Grady Barnes at [gbarnes@prevencio.com](mailto:gbarnes@prevencio.com). You may also write to us at: Prevenccio Inc, Attention: Privacy Officer, 11335 NE 122nd Way, STE 105, Kirkland, WA 98034 USA. Please note that there are certain limitations on these rights, as described in the Privacy Shield framework.

### **Law Enforcement Requests**



Prevensio and its affiliates that have certified to the Privacy Shield are required to disclose personal information in response to lawful requests by public authorities, including compliance with national security or law enforcement requirements.

### **Conflicts**

If there is any conflict between the terms in this privacy policy and the Privacy Shield principles, the Privacy Shield principles will govern.