# **Notice of Website Privacy Practices**

Pacific Edge Ltd. together with its affiliates, including Pacific Edge Diagnostics USA, Ltd. and Pacific Edge Diagnostics New Zealand Ltd. (collectively called "Pacific Edge, "we" or "us" in this Privacy Statement) are committed to maintaining the privacy of your personal information provided to us.

This Privacy Statement explains our online information practices for this website and all other websites operated by Pacific Edge ("**Websites**"), and describes the purposes for which we may use, disclose or hold Personal Information. For the purposes of this Privacy Statement "Personal Information" means information about an identifiable individual.

This Statement is given in accordance with our obligations under the following statutes:

- New Zealand
  - o Privacy Act (2020)
  - Health Information Privacy Code (HIPC) (2020)
- Singapore
  - o Personal Data Protection Act (2012)
- Europe
  - o General Data Protection Regulation (GDPR) (2016)
- United States
  - HIPAA Privacy & Security Rules
  - HITECH Act

For information about how we use and/or disclose the health information of people in the United States of America, please refer to our **US Notice of Patient Privacy Practices**.

For information about how we use and/or disclose the health information of people in the Asia Pacific Region, including New Zealand, Australia and Singapore, please refer to our **APAC Notice of Patient Privacy Practices**.

# **Visiting the Websites**

1. During your visit to any of the Websites we may collect statistical data about your visit, such as the date, time and length of your visit, the URLs or addresses of the website pages you visit, the operating system, browser, each engine and IP address used by the computer you are using to connect to the internet, and the domain name from which you are accessing

the internet. This information may be collected by third party software operating on the Websites.

- 2. We may use and disclose such statistical data for the following purposes:
  - a. to measure the effectiveness of any activities on the Websites;
  - b. to identify user behaviour and user trends on the Websites; and
  - c. to maintain and optimize the technical performance, operation and security of the Websites.
- 3. We may disclose such statistical data to others for any purpose, but only on an aggregated basis and in a way that ensures that no individual is able to be identified from such data.

#### **Use of Personal Information**

- 4. During the course of using the Websites you may elect to provide us with Personal Information such as your name, address, email address or phone numbers. This may occur when, for example, you request information from us or register with us for updates.
- 5. We will use, disclose and hold such Personal Information for the purposes of:
  - a. contacting you about the services or products of Pacific Edge, when you have provided us with Personal Information for that purpose;
  - b. assisting to put you in contact with health professionals or other persons, where you have provided us with your Personal Information for that purpose;
  - c. providing you with any other information requested by you;
  - d. gauging customer satisfaction and providing customer services;
  - e. maintaining and improving the Websites;
  - f. providing technical support and administration;
  - g. maintaining our records;
  - h. legislative and regulatory compliance
  - i. addressing feedback or complaints and resolving disputes;
  - j. sending you Direct Marketing Information, but only if you have expressly asked us to; and
  - k. enforcing the terms and conditions governing your use of the Websites.

### **Cookies**

6. The Websites may use cookies. "Cookies" are pieces of software that are placed on the computer, device or browser that you are using to access the internet. Cookies are designed to remember information about your personal preferences for the Websites, to analyse traffic and trends on the Website, and to generally understand the behaviours and interests of people who use the Websites. We will only use and disclose information about your personal preferences so that the Websites will remember you next time you visit. We may use, disclose or sell other data collected by us from cookies for other purposes, but only on an aggregated basis and in a way that ensures that no individual is able to be identified from such information. You can change the settings on your browser to reject some cookies, but this may reduce the functionality of the Websites.

### **Direct Marketing Information**

- 7. We will not sell your Personal Information to direct marketers.
- 8. We will not use Personal Information collected by the Websites to send or email Direct Marketing Information to you, unless you have expressly given us permission to send Direct Marketing Information to you.
- 9. For the purposes of this Privacy Statement, "Direct Marketing Information" means marketing or promotional information about our services or products, or the services or products of carefully selected third parties.
- 10. If you have asked us to send Direct Marketing Information to you, then we may engage third party service providers to send or email Direct Marketing Information to you on our behalf, and we may disclose to such third parties your contact details for this purpose.
- 11. If you have asked us to send to you Direct Marketing Information, and you later decide that you do not want us to send you any further Direct Marketing Information, you can contact us at any time to request that we stop sending you such information. You can either contact our Privacy Officer (see paragraph 20 below) or use the "Unsubscribe" facility at the bottom of any Direct Marketing Information email or communication that we send you.

# **Disclosing Personal Information to Third Parties**

- 12. We will not disclose your Personal Information to third parties, except in the following circumstances:
  - a. we may disclose your Personal Information to the extent reasonably necessary to achieve any of the purposes described in paragraphs 1 to 11;
  - b. we may disclose your Personal Information to law enforcement officials, regulatory agencies or other third parties as we, in our sole discretion, believe necessary or

- appropriate in connection with an investigation of illegal activity that may expose us to legal liability or costs, to enforce our policies governing the Websites and for regulatory compliance; and
- c. we may also disclose your Personal Information in connection with a corporate restructuring, merger or consolidation with, or sale of substantially all of our assets to a third party. We do not guarantee that any entity receiving such information in connection with one of these transactions will abide by this Privacy Statement; however, we shall incorporate such privacy terms and conditions requirements in any necessary agreements with such third parties.

### **Holding Personal Information**

13. We will not hold your Personal Information for longer than is reasonably required for the purposes for which we may lawfully use that Personal Information.

### **Your Rights to Access and Correct Personal Information**

14. Where we hold Personal Information about you, you have a right to access and correct that Personal Information in accordance with applicable privacy laws. If you want to access or correct your Personal Information, please contact our Privacy Officer (see paragraph 20 below) and he/she will tell you how to make a request and if any charges will apply.

### **Transfer of Information**

15. We may transfer the information described in this Privacy Statement to or from other countries to the extent necessary to enable us to operate the Websites, and otherwise to the extent reasonably necessary to achieve any of the purposes described in paragraphs 1 to 11. Some of these countries may have less protective privacy or data protection laws than the region in which you reside. Where this is the case, we will take appropriate measures to protect your Personal Information in accordance with this Privacy Statement.

# **Security**

16. We will use all reasonable endeavours to effect and maintain adequate security measures to safeguard the Personal Information we hold from loss or unauthorized access, use, modification or disclosure. However, as the internet is an open network, we do not warrant or guarantee that your Personal Information is safe from loss or unauthorized access, use, modification or disclosure, either during transmission to or from the Websites, or when held by us.

### **Other Websites**

17. Other websites that are linked to the Websites may have privacy policies that govern the use of information collected by those other websites. We are not responsible for any information collected by those other websites, or the privacy or data protection practices of the operators of those other websites.

#### **Amendments**

- 18. We may amend this Privacy Statement from time to time. Notice of any such amendments will be announced on the Websites and will be effective immediately, unless we state otherwise. You are responsible for reviewing the Websites regularly to obtain timely notice of any such amendments.
- 19. Your continued use of the Websites will constitute your acceptance of any amendments or revisions to this Privacy Statement.

# **Contacting Us or Our Privacy Officer**

#### 20. If you:

- a. have any questions about this Privacy Statement or our privacy and data protection practices;
- b. want to access or correct any Personal Information we hold about you; or
- c. want us to stop sending you Direct Marketing Information, please contact our Privacy Officer: privacy@pacificedgedx.com.