



PRIVACY POLICY

GeneLink BioSciences, Inc. respects the privacy of every individual and has taken extensive precautions to create a process that maintains your individual privacy.

- We are committed to providing a secure environment for our services.
- We use the information you provide to enable your purchase, inform you when the products and services you order are available and provide you with customer service.
- All information you provide to us is kept on a secure server and all laboratory samples are identified by barcode only.
- Your laboratory results are only used to manufacture your requested products and provide related services.
- We do not sell, lease, or rent your personal information without your explicit consent.
- After the sample evaluation process is completed and validated, all DNA sample materials are destroyed.

Definitions

GeneLink - GeneLink BioSciences, Inc., a Pennsylvania Corporation, and its subsidiaries, whose principal place of business are 8250 Exchange Dr. Suite 120. Orlando, FL 32809.

GeneLink Research - Scientific research that GeneLink performs including R&D.

R&D - Research and Development activities performed by GeneLink via generally accepted protocols. These activities may include, among other things, improving our products and/or offering new products or services to you; performing quality control activities.

Assessment – The collection kit and lab process which determines the results of a personalized SNP (Single Nucleotide Polymorphism) report.

Personal Information - Information that can be used to identify you, either alone or in combination with other information.

Your Choices

Contribution of Personal Information other than Registration Information is voluntary and permission-based. Whether to give consent for GeneLink to use your Genetic and Self-Reported Information for GeneLink Research is voluntary. Providing Self-Reported Information through surveys, forms, or features is voluntary. At your written request, we will close your account. As a result, all Genetic Information will be removed from the account and will no longer be accessible. GeneLink will not use your Genetic Information in new research that starts thirty (30) days or more after account closure. We cannot remove Genetic Information that has previously been used for published research or shared with external collaborators before account closure. (See the section below titled "Account Closure and Correction of Personal Information".)



How to Contact Us

If you have questions about this Privacy Policy or about GeneLink's handling of your Personal Information, please email GeneLink's Privacy Administrator at compliance@genelinkbio.com or contact us at this address:

Compliance
GeneLink BioSciences, Inc.
8250 Exchange Drive, Suite 120
Orlando, FL 32809

GeneLink Respects Your Privacy

GeneLink recognizes the importance of privacy and respects your desire to store and access your information in a private and secure manner.

This Privacy Statement for GeneLink is intended to make you aware of how we handle your Personal Information. We are committed to providing you a secure, user-controlled environment for the use of our Services. At the same time, you share responsibility for maintaining privacy and security - for example, by keeping your password secure.

We encourage you to familiarize yourself with this Privacy Statement. Our Consent Form explains that, by using our website and signing up for any service, you are allowing us to process your personal information according to the provisions set forth in those documents and this Privacy Statement.

Personal Information We Collect & How We Use It

GeneLink collects Personal Information from you for all purposes necessary to ensure the regular operation of your account and/or availability of our services. These include, among other things, providing you with our services; improving our services and/or offering new products or services to you; informing you about events; inviting you to participate in specific research projects, contacting you to obtain testimonials or for other promotional purposes; performing quality control activities; conducting other R&D; and, upon your authorization, conducting GeneLink Research.

Except as otherwise set forth herein, we will never release your individual-level Genetic and/or Self-Reported Information to a third party without asking for and receiving your explicit consent to do so, unless required by law.

Registration Information is information that we collect from you when you register, purchase or sign up for our services. Examples of such information include your name, credit card information, billing and shipping addresses, and contact information, such as email address and telephone number. We use Registration Information to enable your purchase, inform you when



your Genetic Information is available to you, provide you with customer service, manage our services, and authenticate your website visits and usage.

We use your Registration Information to authenticate your website visits and usage; to enable your purchase; to communicate with you about information, services, and products that you have requested; and to manage and improve our website, software, and services. We give you the opportunity to opt out of optional communications, either through our Service or by contacting our Privacy Administrator at compliance@genelinkbio.com

Genetic Information is information regarding your genotype generated through the processing of your skin cells by GeneLink or by its contractors, successors, and assignees; or otherwise processed by and/or contributed to GeneLink. It consists of your genotype, e.g., SNPs (pronounced "SNIPS"). Genetic Information is generated when you purchase GeneLink's service and your saliva sample is analyzed and processed or you otherwise contribute or access your Genetic Information through our services. Our instructions for sample collection and shipment clearly require you to put your saliva sample in a bar coded envelope which is mailed to GeneLink's headquarters along with your personal information. GeneLink forwards the envelopes to our third-party laboratory labeled with the unique barcode and no other identifier. The unique barcode identifies you to us but not to the laboratory. We are also required to provide sex and date of birth or age to the laboratory pursuant to Clinical Laboratory Improvement Amendments (CLIA) requirements. No other Personal Information is required for the analysis. Receiving personnel do not perform testing, and testing personnel only handle samples labeled with the unique barcode. DNA and saliva samples are destroyed after the laboratory completes its work, provided that laboratory legal and regulatory requirements no longer require the actual samples to be maintained. The laboratory securely sends the resulting Genetic Information to us along with your unique barcode. Genetic Information is stored securely on our servers; the laboratory also stores your Genetic Information, but labeled only with a sample barcode. The laboratory conducting DNA extraction and analysis does not have access to your name, other Registration Information, or any other Personal Information except your sex and date of birth or age, as required by CLIA.

We use your Genetic Information to provide you with GeneLink services, customize the user experience, and enhance our features. If you do not give your consent to participate in GeneLink Research, GeneLink may still use your Genetic Information for purposes such as quality control or other R&D activities.

Self-Reported Information is all information about yourself, including your health-related information, personal traits, ethnicity, family history, and other information that you enter into surveys, forms, or features while signed in to your GeneLink account. This information is included in GeneLink Research only if you have given consent as described in the applicable Consent Document. It includes information you may provide to us, including but not limited to information about your health-related information (e.g. pulse rate, cholesterol levels, visual acuity, etc.), personal traits (e.g., eye color, height, etc.), ethnicity, and/or family history (e.g. similar information about family members). We may collect this information from you if/ when you enter the information into surveys, forms, or features while signed in to your account. Self-



Reported Information is included in GeneLink Research only you have given consent as described in the applicable Consent Document.

We use your Self-Reported Information to provide you with GeneLink services, customize the user experience, and enhance our features. If you do not give your consent to participate in GeneLink Research, GeneLink may still use your Self-Reported Information for purposes such as quality control or other R&D activities.

User Content is all information, data, text, software, music, audio, photographs, graphics, video, messages, or other materials - *other than* Genetic Information and Self-Reported Information - generated by users of GeneLink services and transmitted, whether publicly or privately, to or through GeneLink. It is all information *other than* Genetic Information or Self-Reported Information generated by users of GeneLink services and transmitted, whether publicly or privately, to GeneLink. User Content may include data, text, software, music, audio, photographs, graphics, video, messages, or other materials. User Content *does not* include Genetic Information or Self-Reported Information.

GeneLink uses User Content to provide our services and improve the overall user experience.

Web Behavior Information is information on how you use the GeneLink website (e.g. browser type, domains, page views, etc.) collected through various web technologies used to communicate web browsing behaviors.log files, cookies, and web beacon technology.

Web Behavior Information may be collected through various technologies used to communicate web-browsing behaviors, as described below, during a visit to the GeneLink website. Web Behavior Information is used to improve our services and the overall user experience

- **Log Files.** When users visit our website, GeneLink gathers certain information automatically and stores it in log files. This information includes Internet Protocol (IP) addresses, browser type, Internet Service Provider, referring/exit pages, operating system, and date/time stamp. We use this information to monitor the usage of our site. Also, when we send e-mails to you, we may be able to identify information about your email address, such as whether you can read graphic HTML emails. We use this information not to identify individual users, but to analyze trends, administer the site, track users' movements around the site, and gather demographic information about our user base as a whole which provides us with the ability to enhance our customers; search and shopping experiences and to determine aggregate information about our user base and usage patterns. We may, in some circumstances, need to review this automatically collected data in combination with specific Registration Information to identify and resolve issues for individual users.
- **Cookies.** The GeneLink website may also uses cookies to enhance the browsing experience on the GeneLink site. A cookie is a small text file or record that is stored on a user's computer when you visit our website, which collects information about your activities on the GeneLink site. The cookies transmit this information back to the computers at GeneLink or our third-party distributors of banners and newsletters; these



computers are, generally speaking, the only computers which are authorized to read such information. The information captured makes it possible for us (i) to speed navigation, keep track of items in your shopping cart, and provide you with custom tailored content (ii) to remember information you give to us so you don't have to reenter it each time you visit the GeneLink site; (iii) to monitor the effectiveness of our marketing campaigns; and (iv) to monitor total number of visitors, pages viewed, and the total number of banners served.

- **Web Beacons.** Information Collected using pixel tags or clear GIFs. To help us understand the effectiveness of certain of our email marketing efforts, GeneLink or Third Party Vendors may use "message format" and "message open" sensing technologies. Both technologies require the use of pixel tags or clear GIFs (also called web beacons.) A web beacon is a clear graphic image that is loaded by your web browser when it accesses a website and that records a user's visit to a particular web page. We, or third parties that work for us, may place cookies and web beacons on our website, in our emails, and in our advertisements that appear on other websites or in emails sent by others that mention our products and services with our permission. The purpose of our web beacons is to support operation of our website and to offer additional products and services through targeted advertisements. The "message format" sensing technology allows us to recognize whether you have enabled your e-mail program to receive HTML emails; if so, this information is then associated with your email address so that subsequent messages can be sent to you in HTML format. The "message open" sensing technology allows us to recognize whether you have opened our e-mail message. We can only detect this if you have enabled your email program to receive HTML emails. If you wish to disable web beacons, it is possible to prevent your browser from loading them, although there is not currently a standard method for doing so.

Information Disclosure

We will not disclose your individual-level Personal Information to any third party, except under the following circumstances:

- Partners or service providers (e.g. our contracted genotyping laboratory or credit card processors) use and/or store the information in order to provide you with GeneLink's Services.
- Research contractors may access your individual-level Personal Information onsite at GeneLink's offices for the purpose of scientific research, provided that all such research contractors will be supervised by GeneLink and subject to GeneLink's access rules and guidelines.
- We are required to do so by law (see the section below titled "Information Disclosure Required by Law").
- You have provided explicit consent for us to do so.

Occasionally, GeneLink uses your Personal Customer Information to market products and services. We do not sell, lease, or rent your individual-level Personal Information without your



explicit consent. As a general rule, GeneLink will not disclose your individual-level Personal Information to any third party, except under the following circumstances:

- **Subcontractors.** We may send Personal Customer Information to third-party subcontractors and agents that work on our behalf to provide certain services. These third parties do not have the right to use the Personal Customer Information beyond what is necessary to assist us or fulfill your order. They are contractually obligated by and subject to their Privacy Policies as incorporated in their terms and/or policies, or GeneLink service contract, to maintain the confidentiality and security of the Personal Customer Information and are restricted from using such information in any way not expressly authorized by GeneLink.
- **Service Providers.** We send Personal Customer Information to third-party providers of goods and services that you may purchase from time to time on our site (e.g., ISP's). Like subcontractors, these third parties do not have the right to use the Personal Customer Information beyond what is necessary to assist us. They are contractually obligated by and subject to their Privacy Policies as incorporated in their terms and/or policies, or GeneLink service contract, to maintain the confidentiality and security of the Personal Customer Information and are restricted from using such information in any way not expressly authorized by GeneLink.
- **Credit Card Companies:** Credit card transactions are handled by a third-party financial institution and their vendors, which receives the encrypted credit card number and other personal identifying information only to verify the credit card numbers and process transactions.

Under certain circumstances Personal Information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders. You acknowledge and agree that GeneLink is free to preserve and disclose any and all Personal Information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal process (such as a judicial proceeding, court order, or government inquiry) or obligations that GeneLink may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the GeneLink TOS; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of GeneLink, its employees, its users, its clients, and the public. In such event we will notify you through the contact information you have provided to us in advance, unless doing so would violate the law or a court order.

Customer Testimonials

We may post customer testimonials on our web site, and may use testimonials in other formats consistent with consent received. Customer testimonials may contain personally identifiable information. We may use your Personal Information to contact you to obtain a testimonial and obtain your consent via email or agreement sent via fax, pdf or mail prior to using such testimonial and/or using your name along with your testimonial.

Account Closure and Correction of 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 compliance@genelinkbio.com. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in the applicable Consent Document, however, Genetic Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in GeneLink Research will not be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Genetic 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 Account Settings page. You may also correct or reset Self-Reported Information entered into a survey, form, or feature by emailing a request to Customer Support at and including the name of the specific survey, form, or feature.

Communications from GeneLink

As a customer, you may receive the following communications from GeneLink: Communications related to transaction and account maintenance activities. These communications include without limitation: order confirmations; order update notices; order problem notices; and notices regarding material changes to site policies and account management procedures. In addition, you may also receive marketing materials relating to new products that may be of interest to you. You may choose to stop or start receiving marketing emails by contacting us at compliance@genelinkbio.com

Underage Customers

GeneLink is committed to protecting the privacy of children as well as adults. Neither GeneLink nor any of its products or services are designed or intended to attract children under the age of 13. A parent or guardian, however, may collect a skin cell sample from, create an account for, and provide Self-Reported information on behalf of his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to GeneLink about his or her child is kept secure and that the information submitted is accurate.

Security

GeneLink takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, GeneLink uses a range of reasonable physical, technical, and administrative measures to safeguard your Personal Information, in accordance with current technological and industry standards. In particular, all connections to and from locations containing Personal Customer Information are encrypted using Secure Socket Layer (SSL) technology, and/or other web based security standards and technologies.



Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should immediately notify GeneLink of any unauthorized use of your password. GeneLink cannot secure Personal Information that you release on your own or that you request us to release.

Changes to This Privacy Statement

This Privacy Statement was last updated July 7, 2014. GeneLink reserves the right to modify or amend this policy at any time by posting the revised privacy policy on our site. The changes will only affect the information we collect after the effective date of the change to our privacy policy unless we clearly express otherwise.