



# Paragon Genomics, Inc.

## Privacy Policy

Get the privacy policy online at: [www.paragongenomics.com/privacy-policy/](http://www.paragongenomics.com/privacy-policy/)

PP1001-01  
July 2019  
For Research Use Only. Not for use in diagnostic procedures.

## Overview

This document and its contents are proprietary to Paragon Genomics, Inc. Paragon Genomics, Inc. (also referred to in this document as “Paragon Genomics”, “Paragon”, “we”, “our” and “us”) is committed to protecting and maintaining your privacy. Paragon Genomics, Inc. is established in the United States, with our registered office at 3521 Investment Boulevard, Suite 1, Hayward, CA 94545, United States and for the purpose of the General Data Protection Regulation (the “GDPR”), we are the data controller for all information processed in relation to the Website. This privacy policy is designed to make you aware of our privacy practices, of the types of information that we collect from you and how that information will be used both when you use our website and client portal at <http://www.paragongenomics.com/> (the “website”), or interact with us offline in relation to providing or receiving goods and/or services. To make this notice easy to access, a link to it is available on the bottom of every Paragon Genomics’ web page.

If you wish to contact Paragon Genomics regarding your personal information or this privacy policy, please contact our Data Protection Officer at [dataprotection@paragongenomics.com](mailto:dataprotection@paragongenomics.com).

This privacy policy covers the collection, treatment and use of any personal information gathered by Paragon Genomics from customers, suppliers, vendors and other entities that Paragon Genomics does business with.

This privacy policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third-party websites, services and applications that you elect to access through our website.

If you do not agree with this privacy policy in general, or any part of it, you should not access the website. Please take a moment to review our policies and practices described below.

Throughout this privacy policy, “personal information” refers to any information that identifies you (either alone or together with other information), such as your name, address, e-mail address, phone number, etc.

All trademarks are the property of Paragon Genomics, Inc. or their respective owners.

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## Revision History

Document	Date	Description of Change
PP1001-01	July 2, 2019	<ul style="list-style-type: none"><li>New Version with GDPR Compliance updates</li></ul>

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# 1. What information do we collect

## Customers and Vendors

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. During the course of your relationship with us, we collect personal information such as your name, postal address, telephone number, fax number, e-mail address, contact and billing information, transaction history (including order, lead, customer service history) and credit card or other financial information (which are encrypted).

If you provide us with your credit card information, the information is encrypted using secure socket layer technology (SSL) and transmitted with a AES-256 encryption. All credit card information is processed by a third-party payment processor and will not be stored on our site.

Through your in-person communications and/or online interactions with Paragon Genomics, we will ask you to provide information regarding your personal or professional interests, demographics, experience with our products and contact preferences. We will combine the information you provide to us through different communications and contact channels, such as combining data collected online with information provided offline. In addition, personal information will be required to determine access eligibility for certain restricted parts of our website.

Further categories of information we collect are set out in Section 2 (How do we use your personal information) below.

## All Visitors to Paragon Genomics Websites

While you are visiting our website, we may collect some technical data related to your browsing session such as IP address, browser type and language, number of visits to our website and the hyperlinks you visited. We use such technical data in aggregate form without identifying you personally for Paragon's own reporting, statistics and website enhancements, as well as for information security purposes.

Login or other tracking information that may identify you through website navigation will be stored for short time periods for technical security, website improvements, customer relationship purposes and so long as you continue interacting with Paragon Genomics.

Please see Section 7 (How we use cookies) below for our use of cookies and similar technologies.

## 2. How do we use your personal information

Paragon Genomics will use the personal information that we collect from you for the general purposes set out below. As it is in our legitimate interest to be responsive to you, to ensure proper customer service, we will use your personal information as follows:

- We will use your contact and sign-in information such as your name, postal address, phone number, fax number and e-mail address for the following purposes:
  - To communicate with you if you submit a query or request a quote
  - To determine access eligibility for certain restricted parts of our website
  - To subscribe you to receive our newsletter or content or if you sign up for our events
- We will use information such as your IP address, browser type, number of visits to our website and hyperlinks for the following purposes:
  - To respond to technical questions
  - To personalize our website and communications
  - To ensure content from our website is presented in the most effective manner for you and your device
  - To monitor and analyze trends, usage and activity in connection with our website and to improve our web page
  - To conduct website troubleshooting, data analysis, testing, research, statistical and survey analysis
  - To keep the website safe and secure
  - To measure and understand the effectiveness of the content that we serve to you and others
- As part of the legal and regulatory obligations that we are subject to, we may also use your contact, usage and payment information to comply with such obligations and to comply with governmental and regulatory decisions.
- Whenever we collect credit card numbers or other financial data, the data is only used for payment processing and the data is not retained for any other purpose.

From time to time and in accordance with applicable law, we may also use your information to contact you for market research or to provide you with marketing information we think would be of particular interest. To unsubscribe from promotional emails, please click [here](#) or see below for more information (under Marketing Communications).

## User Forums

The website may in the future contain areas where users can transmit or post communications, for example on blogs, chat rooms, bulletin boards or user forums. You should be aware that any personal information you submit there can be read, collected, or used by other users, and could be used to send you unsolicited messages. We are not responsible for the personal information you choose to submit in such public areas.

## 3. Marketing Communications

To the extent permitted by law, we will send you periodic marketing messages from Paragon Genomics, including newsletters, promotions and special offers. We will use your name, postal address, telephone number, fax number, social media profile and email address to send these messages to you. You are able to opt out of receiving such messages without any negative effect to your relationship with Paragon Genomics by following the unsubscribe instructions included in each marketing email. However, please note that opting out will prevent you from receiving email messages regarding updates, improvements, or special offers. If you opt out of such marketing messages, we will continue to send you non-marketing emails, e.g. emails about our business dealings with you. We also reserve the right to contact you when we believe it necessary, including where required by law.

We will also provide you the opportunity to let us know if you wish to opt out at any time of other contacts from Paragon Genomics and without any negative effect to your relationship with Paragon Genomics, and we will do everything we can to honor such requests. This choice will be offered at the bottom of our online or offline communications to you as well as on our web registration pages.

If you have any difficulty opting out, please use this unsubscribe [form](#).

## 4. Where we store and who we share your personal information with

The personal information that we collect from you in relation to the selling of our products and services will be subject to the terms of the Paragon Genomics' contract. Where the GDPR applies, such personal information will be transferred to and processed in the USA by Paragon Genomics, Inc. under the European Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses) (the "Model Clauses"), pursuant to

Decision 2004/915/EC and 2010/87/EU. Please contact [dataprotection@paragongenomics.com](mailto:dataprotection@paragongenomics.com) if you would like to see a copy of the Model Clauses.

It will also be processed by staff operating outside the country in which you reside (including countries outside of the European Economic Area ("EEA") who work for us or one of our resellers, distributors, service providers or suppliers as noted below.

We share your information with selected recipients. These categories of recipients include:

- Cloud storage providers to store the personal information you provide and for disaster recovery services
- Service providers that provide us with customer relationship management (CRM) services
- Services providers that provide us with survey services
- Agents and suppliers that provide us with technology services
- Distributors of our products and services
- Sales management services providers that provide us with SaaS services
- Services providers that provide us with invoicing services
- Our professional advisors, auditors and business partners

Where the GDPR applies and the recipient of your personal information is located outside the EEA, such transfer will either be: (i) to a recipient certified to the US Department of Commerce's EU-US Privacy Shield; or (ii) subject to the Model Clauses. For more information about the EU-US Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield [website](#).

Paragon Genomics, Inc. does not sell, rent, or lease your personal information.

Paragon Genomics will only disclose your personal information: (i) if we are required to do so by law; (ii) if we believe that it is necessary to enforce or apply our terms of use and other agreements or otherwise protect and defend the rights, property or safety of Paragon Genomics, or that of our customers; (iii) in order to comply with a judicial proceeding, court order or other legal obligation or government inquiry; or (iv) to any entity that acquires any part of Paragon's current operations by way of merger, acquisition, reorganization or sale of assets. You will be notified via email and/or a prominent notice on our website of any change in ownership or usage of your personal information, as well as any choices you have regarding your personal information.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## 5. Your Rights

Where GDPR applies you have the following rights.

### Access and Portability

You have the right to ask us to access the personal data we hold about you and be provided with certain information about how we use your personal data and who we share it with.

Where you have provided your personal data to us with your consent, you have the right to ask us for a copy of this data in a structured, machine readable format.

### Correction

You also have the right to ask us to correct your personal data where it is inaccurate or incomplete.

### Restriction

You have the right to ask us to restrict (stop) any active processing of your personal data.

- where you believe the personal data that we hold about you is inaccurate and while we verify accuracy;
- where we want to erase your personal data as the processing is unlawful but you want us to continue to store it;
- where we no longer need your personal data for the purposes of our processing but you require us to retain the data for the establishment, exercise or defense of legal claims; or
- where you have objected to us processing your personal data based on our legitimate interest and we are considering your objection.

### Right to deletion

In certain circumstances, you have the right to ask us to delete the personal data we hold about you.

- where you believe that it is no longer necessary for us to hold your personal data;
- where we are processing your personal data on the basis of legitimate interests and you object to such processing and we cannot demonstrate an overriding legitimate ground for the processing;
- where you have provided your personal data to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal data; or
- where you believe the personal data that we hold about you is being unlawfully processed by us.

You can withdraw your consent at any time by clicking [here](#).

In the event that you wish to make a complaint about how we process your personal information, please contact us immediately at [dataprotection@paragongenomics.com](mailto:dataprotection@paragongenomics.com) and we will process your request as soon as possible. This is without prejudice to your right to raise a complaint with a relevant supervisory authority in the country in which you live or work, where you think we have infringed data protection laws.

## 6. How we keep your personal information secure

Paragon Genomics is committed to ensuring the security of your personal information. To prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use of personal information, we have put in place appropriate physical, electronic and organizational measures to safeguard and secure it. We will store personal information in locations outside our direct control (e.g. on servers or databases co-located with hosting providers) and ensure that we have appropriate technical and organizational measures in place with such providers.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

Unfortunately, the transmission of information over the internet is not completely secure. We cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk.

If you have any questions about security on our website, you can contact us at [dataprotection@paragongenomics.com](mailto:dataprotection@paragongenomics.com).

## 7. How we use Cookies

While you are visiting our website, we collect technical data related to your browsing session such as IP address, browser type and language, number of visits to our website and the hyperlinks you visited.

We use such technical data in aggregate form without identifying you personally for Paragon Genomics' own reporting, statistics and website enhancements, as well as for information security purposes.

For further details about the data we collect through cookies, their purpose and your choices in relation to cookies, please email [dataprotection@paragongenomics.com](mailto:dataprotection@paragongenomics.com).

As a user you have the ability to accept or decline the use of cookies. Where required by law, Paragon Genomics indicates its use of cookies through a prominent banner on our Website. Cookies can be removed explicitly using functionality built into most web browsers and you can refuse to accept cookies by activating this setting on your browser. You can also set up your web browser to notify you of cookie placement requests, to ask for permission to accept them, or to decline cookies completely.

If you choose to decline cookies, parts of the website will be unavailable to you.

For information on how to adjust your browser regarding cookies, please visit:

Microsoft Internet Explorer: <http://www.microsoft.com/info/cookies.html>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Opera: <https://blogs.opera.com/news/2015/08/how-to-manage-cookies-in-opera/>

## Log Files

As is true of most web sites, we gather certain information automatically and store it in log files. This information will include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We use this information to improve services we offer you, analytics and site functionality. We do not use this data for any other purpose.

## Website Tracking

We use Google Analytics, a web analytics tool, to help us understand how users engage with our website. Like many services, Google Analytics tracks movement through our site (i.e. the pages you have seen and the links people have clicked on) and help us measure how people interact with the content that we provide. This information is used to compile reports and to help us improve our website. The reports disclose website trends without identifying individual visitors. You can opt out of accepting cookies but this does affect your personalized experience of paragongenomics.com.

## 8. Why we collect your data and for how long it is stored

Why we collect your data	Personal data categories	Legal basis for processing	Retention period
Marketing communications including newsletters, webinars, and direct marketing	Name, title and contact details (email address and phone number)	Consent – we obtain opt in consent before marketing to contacts  Legitimate interest if marketing to new and existing customers	5 years from opt-in
Pre-sales activities (quotes, trial kit orders, customer demos)	Name, title and contact details (email address and phone number)	Legitimate interest of selling products and services to new and existing customers	5 years from date of creation
Orders	Name, title, contact details (email address and phone number), billing and shipping address	Legitimate interest if selling products and services to new and existing customers	10 years
Customer services, technical support and compliant management	Name, title and contact details (email address and phone number)	Legitimate interest of supporting existing customers	Service and support records are retained for 10 years from date of creation
Research and development (“R&D”), quality assurance, product validation (product testing pre-sales)	Name, title and contact details (email address and phone number)	Legitimate interest in testing, evaluating and improving Paragon Genomics’ products and services	Records relating to R&D for new products are maintained until such time as they are no longer required for R&D purposes.  Other records not relating to R&D are retained for 2 years from when they are created.
External studies			
Customer satisfaction and product feature surveys	Name, title and contact details (email address and phone number)  IP Address	Consent obtained when requesting customer to respond to survey.  Legitimate interest of marketing to new and existing customers.	6 years
To facilitate annual conferences for customers where Paragon Genomics advertises new features, updates, product road maps	Name, title and contact details (email address and phone number)  Employment information related to where a conference attendee is currently employed	Legitimate interest of marketing to new and existing customers	5 years

## 9. Additional Information

### Links to Third-Party Websites

Links to third-party websites are provided solely as a convenience to you. If you use these links, you will leave the Paragon website. Paragon Genomics has not reviewed, does not control and is not responsible for these websites, their content, or their privacy policy. Thus, we do not endorse or make any representations about them, any information, software or other products or materials found there, or any results of using them. If you decide to access any of the third-party sites linked to Paragon Genomics' website, you do so entirely at your own risk.

### Jobs at Paragon Genomics

When you choose to apply to become part of the Paragon Genomics' team, please note that you will be taken to a third-party URL and these pages will be branded as Paragon Genomics. The information you provide via the URL will be used solely for the purposes for which it is provided (including the processing of your application) and will be retained for such period as is necessary to comply with Paragon Genomics' legal and administrative requirements.

For candidates applying for jobs, please refer to our [Job Applicant Privacy Policy](#) which provides information about how Paragon Genomics uses your personal information.

### Changes to the Privacy policy

This privacy policy is effective as of the date stated at the start of this privacy policy. We reserve the right to modify this privacy policy at any time by posting the revised policy on our website and updating the date the statement was last revised at the start of this privacy policy. If we make material changes to this privacy policy, we will notify you by email or by means of a prominent notice on our home page. Unless we ask for your explicit agreement to certain terms of our policy, we consider that your continuous use of our website means that you accept the terms of this privacy policy.

### Contact Information

Please contact us with questions or comments about our privacy practices at:

Data Protection Officer

[dataprotection@paragongenomics.com](mailto:dataprotection@paragongenomics.com)

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