

Privacy policy at Xpress Genomics AB

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Xpress Genomics respects your privacy and is committed to protecting your personal data. Below we detail the information stored and the extensive security plan to keep all information safe.

1. Introduction.

The purpose of the privacy policy is to detail what information is stored, why it is stored, how it is handled stored and protected. Personal data, or personal information, is information about an individual from which that person can be identified.

2. Data collection.

We may collect, use, and store different kinds of personal data of the following types:

- a. Personal data.
- b. Genetic data.

a. Personal data

Different types of personal data are stored when a prospective customer registers at xpress-genomics.com. This includes first name, last name, username, email address, phone number, work affiliation, delivery address, invoicing address, password, requests of services at Xpress Genomics, summary of executed services at Xpress Genomics, access statistics of the Xpress Genomics site, and information on whether invoices have been paid.

The personal data is collected from registering at the Xpress Genomics website, or from phone or email correspondence with Xpress Genomics staff. The personal data is used to communicate with customers, to coordinate transfer of samples and data.

b. Genetic data

Genetic data, that is genomic sequence data from anonymized DNA and RNA samples submitted for analyses at Xpress Genomics AB. Samples processed at Xpress Genomics are anonymized, although the genetic sequence data itself contains genetic variant information that, hypothetically, could be used to identify a person, given that in the future large enough genetic information databases of human individuals would ever exist.

The genetic data is generated during our RNA sequencing services and it is the information (together with processed data) that will be returned to our customers after completion of service.

3. Data processing and storage.

We handle and store personal data and genetic data with strong security in mind, using encryption for personal data and for human genetic data. The data is stored within our dedicated servers. For human genetic sequencing data that has been processed on our dedicated servers, the data is encrypted and transferred through privacy-protecting third party services in Europe that fully comply with GDPR. Encrypted data might be additionally stored as backup within Xpress Genomics or third parties in Europe that fully comply with GDPR, for the case that customers lose its data.

Genetic variant information can be interpreted in order to verify integrity of samples and for quality control purpose, in order to provide an excellent service to customers.

4. Data sharing.

We may share your personal data with third parties only in exceptional cases. These cases are:

- with IT firms that are hired as consultants for our IT systems.
- with third party during due diligence if the third party would like to invest in Xpress Genomics, or whether a third party would like to acquire Xpress Genomics. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

In the above situations, the third parties are required to respect the security of your personal data and to treat it in accordance with the law.

5. Data retention.

We will only retain your personal data and genetic data as long as reasonable to provide a professional service. Personal data is retained as long as you are an active customer that continues to request services. Inactive users who have not used Xpress Genomics services for five (5) years will be automatically removed from the system, i.e. personal data and provided genetic sequence data will be permanently deleted, provided that all outstanding invoices for services have been paid.

In some circumstances, we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

6. User rights.

Under certain circumstances, you have rights under data protection laws in relation to your personal data and genetic data. You have the right to:

Request to Access.

You have the right to access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request for Correction.

You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request to Erase.

You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to Processing.

You have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation

which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request Restriction of processing.

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request to Transfer Data.

You have the right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw Your Consent at Any Time.

Where we are relying on consent to process your personal data, you can withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email us at this address (info@xpress-genomics.com).

No Fee Usually Required.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What We May Need From You.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

We encourage users to regularly view the privacy policy at Xpress Genomics for any updates.