

Effective Date: 5-15-2018

## **Privacy Statement**

This privacy statement ("Privacy Statement") explains the information practices of AHNP Precision Health, LLC ("AHNP Precision Health"). Specifically, this statement discusses the practices of our Services (as defined below) and of any website that links to this Privacy Statement, including <a href="www.ahnphealth.com">www.ahnphealth.com</a> (the "Site"). Our Privacy Statement is designed to help you better understand how we collect, use, store, process, and transfer your information when using our Services or Site.

## **Services Privacy Policy**

This section describes how we collect, use, store, process, and transfer your information when you use our integrated system of genetic, blood/biomarker, and behavioral testing that prepares patients and clients for prevention and treatment protocols for Alzheimer's Disease and Type 2 Diabetes (the "Services").

#### Information Collection

**Medical Information** You may provide us with medical information about yourself, including your disease conditions and other health-related information. In addition, we may collect your blood test and genome test results.

**Registration Information** When you register an account with us or purchase our Services, we may collect personal information, such as your name, date of birth, billing and shipping address, payment information and other contact information such as your email address and phone number.

**Self-Reported Information** You have the option to provide us with additional information about yourself through surveys, forms, features or applications. For example, you may provide us with information about your personal traits (e.g., eye color, height), ethnicity, disease conditions (e.g. Type 2 Diabetes), other health-related information (e.g., pulse rate, cholesterol levels, visual acuity), and family history information (e.g., information similar to the foregoing about your family members). Where you are disclosing information about a family member, you should make sure that you have permission from the family member to do so.

#### **Information Use**

When using our Services, we collect and handle information:

• To open your account, enable purchases and process payments, communicate with you, and implement your requests;



- To provide, analyze and improve our Services;
- To comply with laws and regulations; and
- When you consent, for research purposes, the results of which could be used to develop therapeutics.

## **Information Sharing**

We may share your personal information with the following third parties:

- With third party services providers that help us to provide, analyze and improve our Services;
- With our affiliates to help us to provide, analyze and improve our Services;
- As part of a merger, acquisition, or other transfer of all or part of our assets including as part of a bankruptcy proceeding;
- Pursuant to a subpoena, court order, governmental inquiry, or other legal process or as otherwise required by law, or to protect our rights or the rights of third parties;
- With your consent or as otherwise disclosed in this Privacy Statement or at the time of data collection or sharing.

We may share information that has been de-identified or aggregated without limitation.

## **Using Information with your Consent**

With your consent, you can choose to participate in AHNP Precision Health Research. "AHNP Precision Health Research" refers to research aimed at publication in peer-reviewed journals and other research funded by the federal government (such as the National Institutes of Health - NIH) conducted by AHNP Precision Health. AHNP Precision Health Research may be sponsored by, conducted on behalf of, or in collaboration with third-parties, such as non-profit foundations, academic institutions, or pharmaceutical companies. AHNP Precision Health Research may study a specific group or population, identify potential areas or targets for therapeutics development, conduct or support the development of drugs, diagnostics or devices to diagnose, predict or treat medical or other health conditions, work with public, private and/or non-profit entities on genetic research initiatives, or otherwise create, commercialize, and apply this new knowledge to improve health care. AHNP Precision Health Research uses your aggregate or individual-level Medical Information and Self-Reported Information as specified in the Consent Document.

#### **Consent Process for Research**

Your Medical and Self-Reported Information may be used for AHNP Precision Health Research only if you have consented to this use by completing a Consent Document. If you have completed a Consent Document then AHNP Precision Health may use individual-level Medical Information and Self-Reported Information internally at AHNP Precision Health for Research purposes. In addition, we may allow third-party research contractors to access your individual level Medical or Self-Reported Information onsite at AHNP Precision Health's offices for the purpose of conducting scientific research, provided that all such research contractors will be supervised by AHNP Precision Health and subject to AHNP Precision Health's access rules and guidelines. If you do not complete a Consent Document, your information will not be used for AHNP Precision Health Research.



### Withdrawing Consent

You may withdraw your consent to participate in AHNP Precision Health Research at any time by contacting the Human Protections Administrator at support@ahnphealth.com. Withdrawal is not effective until 30 days after closing an individual's account. If you withdraw your consent, we will not include your Medical Information or Self-Reported Information in new research occurring after 30 days from the receipt of your request. Any research involving your data that has already been performed or published prior to our receipt of your request will not be reversed, undone, or withdrawn. You may also discontinue your participation in research by closing your AHNP account. If you withdraw your consent for research, we may continue to use and disclose your Medical Information and Self-Reported Information as otherwise permitted by this Privacy Statement.

## Recruiting for external research

Academic institutions, healthcare organizations, and other groups often conduct research projects. While we do not share individual-level Medical Information or Self-Reported Information with third-parties without your consent, from time to time we may inform you of third-party research opportunities for which you may be eligible. For example, if a university tells us about a new cancer research project, we may send an email to AHNP Precision Health members who potentially fit the relevant eligibility criteria based on their Self-Reported Information to make them aware of the research project and provide a link to participate with the research organization conducting the study. If you do not wish to receive these alerts, you can manage them in your settings.

#### **Account Closure**

If you no longer wish to participate in our Services, you may close your account by sending a request to Customer Care at support@ahnphealth.com subject Account Closure. When closing an account, we remove all Medical Information within your account (or profile) within thirty (30) days of our receipt of your request. As stated in any applicable Consent Document, however, Medical Information and/or Self-Reported Information that you have previously provided and for which you have given consent to use in AHNP Precision Health Research cannot be removed from ongoing or completed studies that use the information. Our contracted genotyping laboratory may also retain your Medical Information as required by local law and we may retain backup copies pursuant to our data protection policies.

# Website Privacy Policy

This section describes the information we collect, use, and share through our Site.

#### **Information Collection**

When using our Site, you may voluntarily provide information about yourself including your name, address, email address, phone number, organization, and payment information. We collect this information when you contact us. We also collect information relating to your interactions with us and our Site, such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser. We may use cookies or similar technologies to collect



this information.

#### **Information Use**

We use your personal information for the following purposes:

- To respond to your inquiries or contact you as you request;
- For internal business purposes, including for analytics and marketing purposes;
- To operate our Site, including to address fraud;
- To comply with the law and maintain the security of our Site; or offer our products services to you, including through emails, promotions or contests; or
- As otherwise disclosed at the time personal information is collected.

Where we intend to use or otherwise process your personal information for a purpose other than the purpose for which it was collected, we will provide you with information regarding the purpose for the processing, as well as other relevant information, prior to processing your personal information for the new purpose.

## **Information Sharing**

We may share your personal information with the following third parties:

- With third party services providers;
- With providers that help secure the security of our Site, including to address fraud and to enforce applicable Terms of Service;
- As part of a merger, acquisition, or other transfer of all or part of our assets including as part of a bank-ruptcy proceeding;
- Pursuant to a subpoena, court order, governmental inquiry, or other legal process or as otherwise required by law, or to protect our rights or the rights of third parties;
- With your consent or as otherwise disclosed at the time of data collection or sharing.

We may share information that has been de-identified or aggregated without limitation.

## **Digital Advertising & Analytics**

We may partner with ad networks and other ad serving providers ("Advertising Providers") that serve ads on behalf of us and others on non-affiliated platforms. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information Advertising Providers collect about your use of the Site and other sites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

AHNP Prevision Health adheres to the Digital Advertising Alliance ("DAA") Self-Regulatory Principles in



connection with this interest-based advertising activity. You may visit the DAA Webchoices tool at www. aboutads.info to learn more about this type of advertising and how to opt out of this advertising on websites by companies participating in the DAA self-regulatory program. If you delete your cookies or use a different browser or mobile device, you may need to renew your opt-out choices exercised through the DAA Webchoices tool. Note that electing to opt out will not stop advertising from appearing in your browser or applications. It may make the ads you see less relevant to your interests. Additionally, your browser may offer tools to limit the use of cookies or to delete cookies; however, if you use these tools, our Site may not function as intended.

We may also work with third parties that collect data about your use of the Site and other sites or apps over time for non-advertising purposes. AHNP Precision Health uses Google Analytics and other third-party services to improve the performance of the Site and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Site, visit <a href="https://www.google.com/policies/privacy/partners/">https://www.google.com/policies/privacy/partners/</a>, and to opt out of Google Analytics, visit <a href="https://tools.google.com/dlpage/gaoptout/">https://tools.google.com/dlpage/gaoptout/</a>.

## **Blogs**

Our Site may offer publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. Please exercise caution before choosing to share personal information publicly on our blogs, community forums or in any other posting. Note also that you may be required to register with a third-party application to post a comment. To learn how the third-party application uses your information, please review their privacy statement.

#### **Your Choices**

You can review, modify, or update most of your Registration Information from your Account Settings page. Please note that modifying or deleting your Registration Information on your Account Settings Page will not affect any information that has been shared with others through the Service.

Upon request AHNP Precision Health will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at support@ahnphealth.com.

## **Marketing Communications**

By registering for an account, you are agreeing that we may send you promotional emails about our Services. You can opt-out of receiving certain messages or notifications from us by clicking the "unsubscribe" link in the body of the communication or by contacting our Privacy Administrator at support@ahnphealth.com.

#### **Linked Websites**

AHNP Precision Health provides links to third-party websites operated by organizations not affiliated with AHNP Precision Health. AHNP Precision Health does not control these websites or the privacy practices of these organizations that operate the websites. We encourage you to read the privacy statements of each and every website that you visit.



## **Children's Privacy**

Neither AHNP Precision Health nor any of its Services are designed for, intended to attract, or directed toward children under the age of 13. A parent or guardian, however, may collect a blood lab sample from, create an account for, and provide information related to, his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to AHNP Precision Health about his or her child is kept secure and that the information submitted is accurate.

## **Changes to this Privacy Statement**

We may change or update this Privacy Statement periodically. If we modify this Privacy Statement, we will notify you by posting a revised Privacy Statement on the Site with a new effective date. We encourage you to review this Privacy Statement periodically to stay informed of our current privacy practices.

#### **Contact Information**

If you have questions about this Privacy Statement, please email AHNP Precision Health's Privacy Administrator at support@ahnphealth.com, or send a letter to:

Privacy Administrator AHNP Precision Health, LLC. PO BOX 117040 Burlingame, CA 94011

