

uBiome, Inc.  
PRIVACY POLICY

uBiome, Inc. (“uBiome,” “we” or “us”) is committed to protecting your privacy. This Privacy Policy explains how information about you or associated with you is collected, used and shared by uBiome.

This Privacy Policy applies to our websites, microbiome analysis services and other services and applications we may provide (collectively, our “Service”).

By accessing or using our service, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy. If you do not agree with this policy, do not access or use our Service or interact with any other aspect of our business.

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## INFORMATION WE COLLECT

We collect information about you when you provide it to us, when you use our Service, and when other sources provide it to us, as described below.

- **Information you provide**
  - We may collect information you enter in our Service or provide to us in some other manner, including your name, email address, password, physical address, and billing information.
  - We may collect any communications between you and us, as well as any additional information you provide.
- **Information we collect automatically when you use our Service**
  - Cookies and Other Tracking Technologies
    - We automatically collect certain types of usage information when you visit our website or use our Service. When you visit our website, we may send

one or more cookies - a small text file containing a string of alphanumeric characters - to your computer that uniquely identifies your browser.

- A cookie may convey information to us about how you use our Service (for example, the pages you view, the links you click, how frequently you access our Service, and other actions you take on our Service), and allow us to track your usage of our Service over time.
- We may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of our Service.
- Device and Connection Information
  - We may collect log file information from your browser or mobile device each time you access our Service. Log file information may include Internet Protocol (“IP”) address, browser type, information about your mobile device, referring / exit pages and URLs, number of clicks and how you interact with links on our Service, domain names, landing pages, pages viewed.
  - When you access our Service by or through a mobile device, we may collect and store unique identification numbers associated with your device or our mobile application, mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, and phone number.
- **Information collected through the use of our Service**
  - Information you provide through the use of our Service such as self-reported information and microbiome data.
- **Information we receive from third parties**
  - We may receive information about you and your activities on and off our Service from public sources and third-party partners, such as advertising and market research partners who provide us with information about your interest in, and engagement with, our Service and online advertisements.

## **HOW WE USE INFORMATION WE COLLECT**

- **To provide our Service**
  - We use information about you to provide our Service to you, including to process transactions with you, authenticate you when you log in, provide customer support, and to monitor, operate and maintain our Service.
  
- **To communicate with you**
  - We may send you Service-related emails or messages that may contain personal information (for example account verification, change or updates to features, technical and security notices).
  - Please be aware that communications via email over the internet are not encrypted. Although unlikely, there is a possibility that information in an email can be intercepted and read by other parties besides the person to whom it is addressed. If you have concerns about the use of email, you may contact us as provided in the Contacting Us section to request assistance.
  
- **To market, promote, and drive engagement with our Service**
  - We may use your information to help us measure traffic and usage trends for our Service, to understand more about the demographics of our users, and to provide custom, personalized content and information, including targeted content and advertising for other uBiome products.
  
- **For research and development**
  - If you have given consent for your information to be used in research as described in the Research Consent document, we may use your Information for research purposes to improve our Service.

## **HOW WE SHARE INFORMATION WE COLLECT**

We share information about you with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service.

- **Service providers**
  - We work with third party vendors, consultants and other providers that perform services on our behalf, which may include backup, storage, infrastructure, payment processing, identifying and serving targeted content, or analytics services.
  
- **Research affiliates**
  - If you have given consent for your information to be used in research as described in the Research Consent document, we may share your information for research, such as for the purpose of publication in a peer-reviewed scientific journal.

- **Compliance with enforcement requests and applicable laws; Enforcement of our rights**
  - We may share information as required to satisfy any applicable law, regulation, court order, legal process or other government request, to enforce our Terms of Service (including the investigation of potential violations thereof), or to investigate and defend ourselves against any third party claims or allegations.
- **Links to third party websites**
  - Our Service may contain links to and from third party websites of our business partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.
- **Aggregated data**
  - We may share information in an aggregated and anonymous form that does not identify you directly as an individual.

## **STORAGE AND SECURITY OF INFORMATION**

- **Storage and international transfers of your information**
  - Your information collected through the Service may be stored and processed in the United States or another country in which uBiome, our affiliates, or service providers maintain facilities.
  - We may transfer information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of your information to the U.S. or any other country in which uBiome, our affiliates, or service providers maintain facilities and the use of your information as described in this Privacy Policy.
- **Security of your information**
  - We take reasonable physical, administrative, and technological safeguards to preserve the integrity and security of your information. However, no security system is impenetrable and we cannot guarantee that your information is completely safe from intrusion.
  - In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have

been compromised and take other steps in accordance with any applicable laws and regulations.

- **How long we keep your information**

- We will retain your information for as long as your account is active or as needed to provide you our Service. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our Service.
- Where we retain information for improvement and development of our Service, we take steps to eliminate information that directly identifies you as an individual.
- We retain information about your marketing preferences unless you specifically ask us to delete such information. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

- **Persons under the age of 13**

- Our Service and its content are not directed at children under the age of 13. In the event that we learn that we have collected information from a child under age 13 without parental consent, we will take steps to delete such information.
- If you believe that we might have any information collected from a child under 13, please contact us as provided in the Contacting Us section.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

You have certain choices available to you when it comes to your information, as stated below. You may contact us as provided in the Contacting Us section to request assistance.

- **Access and update your information**

- You may access and update to your information. For example, you can access your profile information from your account and modify content using the editing tools associated with that content.

- **Delete your information**

- You may request that we delete or anonymize certain information about you. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

- **Request that we stop using your information**
  - You may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy.
  - Where you gave us consent to use your information for a limited purpose, you may withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes.
- **Opt out of communications**
  - You may opt out of receiving promotional communications from us and to have your contact information removed from our promotional email list or database.
- **"Do Not Track" Signals**
  - Some browsers have "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Service do not currently respond to browser DNT signals.
- **Copy of your information**
  - Upon your request, we will provide you or a third party that you designate with an file of your basic account information in a structured, electronic format.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we are permitted by law or have compelling legitimate interests to keep.

Where you have asked us to share data with third parties, for example, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted.

If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

For uses and disclosures of Protected Health Information ("PHI") please consult our Notification of Privacy Practices.

## **UPDATES TO OUR PRIVACY POLICY**

We may modify this Privacy Policy from time to time. If we make any changes to this Policy, we will change the "Last Revision" date below and will post the updated Privacy Policy on this page.

If you object to any changes to this Policy, you may close your account. Continuing to use our Service after we publish changes to this Privacy Policy means that you are consenting to the changes.

## **CONTACTING US**

If you have questions about this Privacy Policy, please contact us at [privacyofficer@ubiome.com](mailto:privacyofficer@ubiome.com) or by writing to us at:

uBiome, Inc.  
Attn: Privacy Officer  
180 Steuart Street, San Francisco, CA 94105

When contacting us, please include sufficient information for us to identify all of your records, such as your name, address, and a telephone number where we can contact you. uBiome will consider your request and provide you a response within a reasonable timeframe.

## **LAST REVISION DATE**

This Privacy Policy was last revised on May 23, 2018, and is effective as of May 25, 2018.