

Data Protection and Privacy Policy

Purpose & Scope

Over the course of standard business, Epigenome Technologies will store de-identified and non-identifiable information; and also generate biometric data, typically next-gen sequencing data derived from donor samples. This policy seeks to protect the privacy of donors from misuse of their personal data, or any data derived from their material.

This policy applies to all employees of Epigenome Technologies.

The Chief Executive Officer is the final authority for this policy.

Policy Statement

Epigenome Technologies shall process sensitive and identifiable personal information in accordance with the California Consumer Privacy Act and the General Data Protection Regulation. All employees of Epigenome Technologies, where applicable, shall ensure that such data is:

- Collected for explicit purposes
- Not further processed in a manner that is incompatible with the explicit purposes
- Limited to what is necessary to achieve the explicit purposes
- Stored and processed in a manner that ensures appropriate security
- Under no circumstances disclosed to 3rd parties

Identifiable or sensitive personal information shall be governed by a project-specific data use policy that (i) provides an explicit purpose of the data, (ii) defines the method of storage and processing that ensures security, and (iii) establishes when and how the data shall be de-identified and/or destroyed.


The method of storage and processing shall segregate identifiable or sensitive data for the project from data in other projects (identifiable or otherwise), and access to these data shall be restricted only to those employees whose duties pertain to the project.

Employees of Epigenome Technologies shall make no attempts to discover, decrypt, copy, or disseminate any sensitive or personally identifiable information. Where possible, Epigenome Technologies will monitor incoming data and block private and personal information from being communicated electronically.

Violations process

Receipt of Identifiable or Sensitive Information

If Epigenome Technologies or an employee of Epigenome Technologies receives, or is in possession of, personally identifiable or sensitive information that is not governed by a project-specific data use policy; he or she shall:

1. Immediately delete the information and any archives
 2. Notify the originator of the information and the final authority of this policy
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Disclosure of Identifiable or Sensitive Information

An employee of Epigenome Technologies who discloses personally identifiable information or sensitive information to a 3rd party; is aware of such a disclosure; *or who suspects such a disclosure* shall

1. Report immediately to the final authority of this policy the nature of the disclosed information, and any details of the party to whom the information was disclosed

Inadvertent access to Identifiable or Sensitive Information

An employee of Epigenome Technologies who accesses personally identifiable information or sensitive information in a way inconsistent with the project-specific data-use policy governing that data (i.e., having access where none should have been granted) shall:

1. Report immediately to the final authority of this policy what data was accessed, and how access was achieved

