



Laboratory for Personalized Molecular Medicine Privacy Policy

Introduction

The Laboratory for Personalized Molecular Medicine, LLC (LabPMM) is a clinical reference laboratory performing testing for leukemia, lymphoma and health related disorders. Protecting consumer privacy is important to LabPMM. LabPMM adheres to the Safe Harbor Agreement concerning the transfer of personal data from both the European Union (“EU”) and Switzerland to the United States of America. Accordingly, we follow the Safe Harbor Principles published by the U.S. Department of Commerce (the “Principles”) with respect to all such data. If there is any conflict between the policies in this privacy policy and the Principles, the Principles shall govern. This privacy policy outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This privacy policy applies to all personal information received by LabPMM whether in electronic, paper or verbal format.

Definitions

“Personal Information” or “Information” means information that (1) is transferred from the EU or Switzerland to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual. “Sensitive Personal Information” means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual’s health.

Principles

Notice

LabPMM shall inform an individual of the purpose for which it collects and uses the Personal Information and the types of non-agent third parties to which LabPMM discloses or may disclose that Information. LabPMM shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to LabPMM, or as soon as practicable thereafter, and in any event before LabPMM uses or discloses the Information for a purpose other than for which it was originally collected.

Choice

LabPMM will offer individuals the opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. For Sensitive Personal Information, LabPMM will give individuals the opportunity to affirmatively or explicitly (opt out) consent to the disclosure of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. LabPMM shall treat Sensitive Personal Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information.

Onward Transfers

LabPMM will not share your private information with any third parties except where specified upon collection of the data or when required to under law.

Data Security

LabPMM shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. LabPMM has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. LabPMM cannot guarantee the security of Information on or transmitted via the Internet.

Data Integrity

LabPMM shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, LabPMM shall



take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

Access

LabPMM shall allow an individual access to their Personal Information and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated. In certain situations relevant local laws require LabPMM to only provide your Personal Information through approved third parties. For example, in many jurisdictions laboratory results can only be transmitted to patients through an authorized health care provider.

Enforcement

LabPMM uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the Better Business Bureau as a third party resolution provider.

Amendments

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on this website.

Information Subject to Other Policies

LabPMM is committed to following the Principles for all Personal Information within the scope of the Safe Harbor Agreement. However, certain information is subject to policies of LabPMM that may differ in some respects from the general policies set forth in this privacy policy.

Contact Information

Questions, comments or complaints regarding LabPMM's Safe Harbor Policy or data collection and processing practices can be mailed or emailed to:

Laboratory for Personalized Molecular Medicine

Attn: Legal Department

6330 Nancy Ridge Drive

Suite 106

San Diego, CA 92121

info@labpmm.com

Effective date: September 20, 2011

Privacy Complaints by European Union Citizens:

In compliance with the Safe Harbor Principals, LabPMM commits to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this privacy policy should first contact LabPMM using the contact information above. LabPMM has further committed to refer unresolved privacy complaints under the Safe Harbor Principals to an independent dispute mechanism, the BBB EU SAFE HARBOR, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed by LabPMM, you may contact the BBB EU SAFE HARBOR program at the address below:

Council of Better Business Bureaus, Inc.

BBB EU SAFE HARBOR

4200 Wilson Boulevard, Suite 800

Arlington, VA 22203

Phone: 703-276-0100

Web: <http://www.bbb.org/us/safe-harbor-complaints>