

Portal Privacy Notice to the Users of Igenomix Portals

This Privacy Notice explains how personal data is processed when users access and use the Igenomix online portal (the “Portal”).

The Portal is provided by Igenomix Spain Lab SLU, with registered address at C/ Narcís Monturiol Estarriol, 11 – Parcela B – Edificio Europark, Parque Tecnológico de Paterna, 46980 Paterna, Valencia, Spain (“Igenomix”).

This Notice is intended for clinic staff users and patients who access the Portal.

1. Who is responsible for your data

Igenomix and the clinic using the Portal each process personal data for their own purposes and act independently.

- Igenomix is responsible for data processed in connection with:
 - operation and security of the Portal,
 - laboratory testing, reporting, and related services.
- Clinics are responsible for data they process for patient care, clinical decision-making, and staff management.

If you have questions about how your clinic uses your data, please contact the clinic directly.

2. Categories of personal data

Depending on your role, the following categories of data may be processed:

a) Patients

- identification details (e.g. name, date of birth, identifiers),
- health and genetic data included in test reports,
- Portal access credentials (if applicable),
- technical data (e.g. IP address, access logs, device or browser information).

b) Clinic staff users

- identification and professional details (name, role, email),
- account credentials and access rights,
- activity logs and technical data.

3. Purposes of processing

Personal data is processed to:

- provide secure access to test results and related documentation,
- manage user accounts and access rights,
- ensure Portal security, integrity, and availability,
- comply with applicable healthcare, laboratory, and legal obligations,
- investigate incidents, misuse, or security events.

4. Legal grounds for processing

Personal data is processed based on one or more of the following, as permitted by applicable law:

- performance of contractual or professional obligations,
- provision of healthcare, medical diagnosis, or laboratory services,
- compliance with legal and regulatory requirements,
- legitimate operational and security interests.

Clinics are responsible for identifying and communicating the appropriate legal basis for their own processing activities.

5. Data sharing

Personal data may be shared:

- between Igenomix and the clinic for the purposes described above,
- with authorized service providers supporting IT, hosting, security, or support services,
- where required by law or competent authorities.

Access is limited to what is necessary and subject to confidentiality and security obligations.

6. International data transfers

Where personal data is transferred across borders, appropriate safeguards are applied in accordance with applicable data protection laws, such as contractual protection or recognized transfer mechanisms.

7. Data retention

Personal data is retained only for as long as necessary for the purposes described above and in accordance with:

- applicable healthcare and laboratory regulations,
- legal and regulatory retention requirements,
- security and audit needs.

8. Security

Igenomix implements appropriate technical and organizational measures designed to protect personal data against unauthorized access, loss, or misuse.

Users are responsible for keeping their credentials confidential and accessing the Portal only from secure systems.

9. Your rights

Depending on applicable law, individuals may have rights relating to their personal data, including the right to:

- request access or a copy,
- request correction or update,
- request deletion or restriction,
- object to certain processing activities.

Requests should be directed to the party responsible for the relevant processing (Igenomix or the clinic).

10. Changes to this Privacy Notice

This Privacy Notice may be updated from time to time to reflect changes in law, technology, or Portal functionality. The current version will always be made available through the Portal.

11. Contact

For questions relating to this Privacy Notice or data processed by Igenomix, please contact: privacy@igenomix.com

*US State Privacy Notice (California and Similar Laws)

This section applies where US state privacy laws require additional disclosures, including the California Consumer Privacy Act as amended by the California Privacy Rights Act ("CPRA"), and similar state laws.

Categories of personal data

Depending on your interaction with the Portal, the following categories of personal data may be processed:

- identifiers (such as name, email address, account credentials),
- professional or employment-related information (for clinic staff users),
- health and genetic information (for patients),
- internet or electronic activity information (such as access logs and device data).

Purposes of use

Personal data is processed for the purposes described in this Privacy Notice, including providing Portal access, delivering laboratory services, maintaining security, and complying with legal obligations.

Disclosure of personal data

Personal data may be disclosed to:

- clinics, laboratories, and healthcare professionals involved in your care,
- service providers supporting IT, hosting, security, and customer support,
- authorities or third parties where required by law.

Igenomix does not sell or share personal data for cross-context behavioral advertising.

Sensitive personal information

Sensitive personal information, including health and genetic data, is used only for healthcare, laboratory, security, and compliance purposes and not for unrelated commercial use.

Your rights

Where applicable, individuals may have the right to:

- request access to or correction of personal data,

- request deletion of personal data, subject to legal exceptions,
- limit the use of sensitive personal information,
- not be discriminated against for exercising privacy rights.

Requests may be submitted using the contact details provided in this Privacy Notice.

Authorized agents

Where permitted by law, individuals may use an authorized agent to submit privacy requests on their behalf, subject to identity verification requirements.