

# Generation Lab Privacy Policy

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## Overview

Generation Lab, LLC ("Generation Lab," "we", "our", or "us") is committed to safeguarding your privacy. Please review this Privacy Policy carefully, as it applies to all information Generation Lab collects from and about you, whether in writing, verbally, or electronically. This includes information collected from you while using generationlab.com (the "Website") and when you register your SystemAge kit ("Kit") through your account on the Website (collectively, our "Services"). By using our Services, you agree to the collection, use, and disclosure of your information as described in this Privacy Policy. If you do not agree, please do not access or use our Services.

## California Notice at Collection

We collect the categories of personal information (as defined in the California Consumer Privacy Act (CCPA)).

## Outline of Sections

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# Generation Mission and Privacy Commitment

Generation Lab is dedicated to empowering individuals with advanced genetic insights while maintaining the highest standards of data privacy and transparency. We prioritize protecting your privacy by adopting strong safeguards and transparent data practices.

## Information We Collect

We collect various types of information from and about you as outlined below:

**Personal Information:** General term referring to data categories that either personally identify you or relate to you directly. This includes:

1. Registration Information - Name, user ID, password, birthdate, billing and shipping addresses, payment information, and contact details.
2. Genetic Information - Genotype data (e.g., the As, Ts, Cs, and Gs at specific locations in your DNA) methylation data, and genetic reports provided through our Services.
3. Sample Information - Data regarding any sample you submit, such as blood samples analyzed to generate Genetic and Methylation Information or other laboratory values.
4. Self-Reported Information - Information you provide, including gender, health-related data, family history, and other traits.
5. User Content - Information generated by you, such as comments or messages sent through our Services.
6. Web-Behavior Information - Information on how you interact with our Services, collected through log files, cookies, and similar technologies.
7. Biometric Information - Self-reported biometric data to verify your identity.

**Anonymized Information:** Anonymized and aggregated Information describes group-level data, such as the number of customers with a specific health condition, and cannot be reasonably linked back to any individual.

## How We Collect Information

1. You - Information provided when registering, purchasing, or otherwise interacting with Generation Lab Services.
2. Service Providers - Information collected through partners using cookies, tags, and similar technologies. See our Cookie Policy for more details.
3. Other Third Parties - Information from third-party sources, such as lab results or social media interactions, that may assist in improving your user experience.
4. Generation Lab Analysis - Inferences based on collected data, such as health predispositions, location estimates, and intervention/protocol data assigned by medical professionals.

# How We Use Your Information

We use your information to:

- Provide Services - Develop, improve, and secure our Services, including new product features.
- Analyze Trends and Usage - Track usage to enhance Services.
- Communicate with You - Provide customer support and inform you about relevant offers or updates.
- Personalize Experiences - Tailor content to your preferences.
- Advertise - Conduct targeted advertising, with your consent where required.
- Security - Safeguard our Services from unauthorized or illegal activities.
- Research - Use anonymized data for discoveries in genetics and medicine.

## Information Storage and Retention

We receive your genetic information when you send in your sample to Generation or our third-party laboratory. Genetic information is stored at our lab for at least six months after testing. We keep your Results on file indefinitely unless you request otherwise.

Your personal information may be stored on servers in the United States and is subject to the laws of the United States, where the data protection and other laws may differ from those of other countries. By using our Services, and providing us with your personal information, you are acknowledging that your personal information may be transferred to countries outside of your country of residence, including to the United States. Where applicable, we will ensure that appropriate safeguards are in place to protect your personal information.

If you are located in the European Economic Area, Switzerland, or the United Kingdom, please note that we may need to transfer your personal information to countries that have not been recognized as providing an adequate level of data protection. We generally use EU Standard Contractual Clauses (or other government-approved contracts) or other lawful data transfer mechanisms that provide appropriate safeguards for personal information that is transferred to countries that have not been recognized as providing an adequate level of protection. To learn more about the cross-border transfer of your personal information or the transfer mechanism we use to lawfully carry out such transfers, you can contact us as set forth in the 'How to Contact Us' section below.

We will retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information; the potential risk of harm from unauthorized use or disclosure of the personal information; the purposes for which we use the personal information; whether we can achieve the purposes through other means; and the applicable legal requirements.

# Information Retention Practices

Generation Lab stores your genetic information securely and retains it based on legal, business, and research needs:

We store your genetic data for six months at our partner lab following initial analysis. Your genetic reports and results are kept on file indefinitely unless you request otherwise. Personal information may be stored on servers within the United States, and is subject to U.S. data protection laws.

By using our Services, you consent to the transfer of your personal information to countries outside your country of residence, including the U.S. When transferring data internationally, we implement lawful data transfer mechanisms, such as EU Standard Contractual Clauses, for the EEA, UK, and Switzerland to ensure appropriate safeguards.

Personal information is retained only as long as needed to fulfill the purposes for which it was collected, including legal, accounting, and regulatory requirements. Retention periods consider the sensitivity and nature of the data, potential risk from unauthorized use, and applicable legal obligations.

## What Research is Generation Lab doing?

Your de-identified data may be used in research studies to advance genetic and therapeutic discoveries. Generation has no need to personally identify sample origins. We will protect your identity from disclosure with best reasonable efforts.

## Data Sharing

We value the trust you place in us. Here's how we share, and don't share, your information:

1. Service Providers - We work with vendors to provide our Services, ensuring they protect your data.
2. Affiliates and Ownership Transfers - In cases of merger or acquisition, your data may be transferred according to this policy.
3. Legal Compliance - Generation Lab will disclose information if required by law, such as through a valid court order.
4. Who We Do Not Share With - Generation Lab does not voluntarily share your Personal Identifying Information with public databases, insurers, employers, or law enforcement absent a valid order.
5. Collaborative research aimed at medical breakthroughs. No Personally Identifying Information will be shared.

## 3rd Parties and Cookies

We use cookies and similar technologies to enhance your browsing experience and deliver relevant advertisements. These do not collect directly identifiable information but may gather data on device usage patterns. You can manage these preferences in your browser settings.

**External Links:** The Website may contain links to third-party websites, which operate independently of us and may have their own privacy practices.

## Your Privacy Controls/Rights

You can exercise various rights over your data, including access, deletion, and opting out of targeted advertising. Contact us at [info@generationlab.com](mailto:info@generationlab.com) to exercise these rights.

## Children's Privacy

Our Services are not designed for children under 18, and we do not knowingly collect information from them.

## International Data Transfers

Personal Information may be stored on servers in the United States or transferred internationally, in compliance with applicable laws and standards, such as Standard Contractual Clauses for the EEA, UK, and Switzerland.

## Security

Generation Lab employs a robust information security program with safeguards to protect your data. We encrypt sensitive information and partner with labs that adhere to our standards.

## Revisions to Privacy Policy

We may update this Privacy Policy periodically. The "Last Revised" date indicates the most recent changes. Continuing to use our Services after updates constitutes acceptance of the revised policy.

## How to Contact Us

For any questions regarding this Privacy Policy, please contact us at [info@generationlab.com](mailto:info@generationlab.com).