

Citrine Informatics Privacy policy

Last Updated: July 7, 2020

SCOPE

This Privacy Policy applies to personal information processed by us in our business, including through our proprietary software, on our website, through our website applications, and via our platform services (collectively, the “Services”). This Privacy Policy does not apply to any third-party websites, services or applications, even if they are accessible through our Services.

REVISIONS TO THIS PRIVACY POLICY

Any information that is collected via our Services is covered by the Privacy Policy in effect at the time such information is collected. We may revise this Privacy Policy from time to time. We will update the “Last Updated” date above to indicate when those changes will become effective.

PRIVACY POLICY HIGHLIGHTS

Collection of Personal Information. We collect personal information in order to operate our business and provide our Services. We limit collection and retention of personal information to only that information needed for such purposes.

Use of Personal Information. We use your personal information to:

- provide our Services and to fulfill our contract with you;
- analyze and improve our Services pursuant to our legitimate interests;
- provide you additional content and Services; and
- communicate with you.

Selling and Sharing Personal Information. We do not sell personal information that we gather. However, we may share your personal information in limited circumstances with our third-party vendors to operate our business and provide

our services. We may also share personal information without consent as required by law.

International Data Transfers. We protect information through legally valid compliance mechanisms including international data transfer agreements.

Your Rights and Choices. Where you have the legal right to request the data we have collected about you, we will provide that information in accordance with the applicable law. You may opt out of certain uses of your personal information where having this information is not required to operate our business. Where you have the right to have your personal information deleted, we will comply with your legal request in accordance with the law. You have choices about what types of communications you receive from us.

By using any of the Services where this Privacy Policy is posted, or an explicit opt-in is required to submit or request information, you acknowledge that you understand and agree with the provisions of this Privacy Policy. If you have any questions or concerns about this Privacy Policy, please contact us at privacy@citrine.io.

COLLECTION OF INFORMATION

Our primary goals in collecting information are to provide and improve our services, to administer your use of these services (including managing your Account, if you are an Account holder), and to enable you to enjoy and easily navigate our services.

INFORMATION YOU PROVIDE DIRECTLY TO US

Account Information. If you create an Account, we'll collect information that can be used to identify you, such as your name, email address, postal address and phone number.

Your Submissions. If you submit information about studies you have performed and the results of those studies, we will associate your submissions with your Account Information.

Your Communications with Us. We collect personal information from you such as email address, phone number, or mailing address when you request information about our services, or when you register for communications that we may offer. We will collect necessary data when you request customer or technical support, apply for a job or otherwise communicate with us for business purposes.

Customer Service and Support. If you call or otherwise interact with our customer service and support, we may collect the information you provide to our representatives. In addition, we may record voice communications between you and our representatives for training and quality assurance purposes and will inform you that you are being recorded at the time of such recording.

Surveys and Feedback. We may contact you to participate in surveys or provide feedback to us. If you decide to participate, you may be asked to provide certain information which may include personal information.

Interactive Features. We may offer interactive features such as commenting functionalities, “likes”, chat services, review forums, tips, and social media pages. Citrine may collect the information you submit or make available through these interactive features. Any information you share on the public sections of these channels will be considered “public” and is not subject to privacy protections referenced herein.

Conferences, Trade Shows, and other Events. We may attend conferences, trade shows, and other events where we collect personal information from individuals who interact with or express an interest in the Company and our Services.

Registration for Sweepstakes or Contests. We may run sweepstakes and contests. Contact information you provide may be used to reach you about the sweepstakes or contest and for other promotional, marketing and business purposes. We will disclose the purposes of gathering this information at the time it

is collected and if in that jurisdiction, we are required to publicly share information about the contest or sweepstakes winners.

INFORMATION WE COLLECT AUTOMATICALLY

Cookies and other Web Technologies. Like many website owners and operators, we use automated data collection tools such as Cookies and Web Beacons to collect certain information.

“**Cookies**” are small text files that are placed on your hard drive by a Web server when you access our Services. We may use both session Cookies and persistent Cookies to identify that you’ve logged in to the Services and to tell us how and when you interact with our Services. We may also use Cookies to monitor aggregate usage and web traffic routing on our Services and to customize and improve our Services. Unlike persistent Cookies, session Cookies are deleted when you log off from the Services and close your browser. Although most browsers automatically accept Cookies, you can change your browser options to stop automatically accepting Cookies or to prompt you before accepting Cookies. Please note, however, that if you don’t accept Cookies, you may not be able to access all portions or features of the Services.

“**Web Beacons**” (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Services to deliver or communicate with Cookies, to track and measure the performance of our Services, to monitor how many visitors view our Services, and to monitor the effectiveness of our advertising. Unlike Cookies, which are stored on the user’s hard drive, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).

Information Related to Your Use of the Services. Our servers automatically record certain information about how a person uses our Services (we refer to this information as “Log Data”), including both Account holders and non-Account holders (either, a “User”). Log Data may include information such as a User’s Internet Protocol (IP) address, browser type, operating system, the web page that a User was visiting before accessing our Services, the pages or features of our Services to which a User browsed and the time spent on those pages or features, search terms, the links on our Services that a User clicked on and other statistics.

We use Log Data to administer the Services and we analyze (and may engage third parties to analyze) Log Data to improve, customize and enhance our Services by expanding their features and functionality and tailoring them to our Users' needs and preferences.

Location Information. When you use our Services, we may collect and store information about your location by converting your IP address into a rough geo-location. We may use location information to improve and personalize our Services for you. You may opt out of location-based services at any time by editing the setting in the browser.

Analytics. We may use Google tools (e.g., Google Analytics and Google Tag Manager) and other service providers, to collect information regarding visitor behavior and visitor demographics on our Services. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google's collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

INFORMATION FROM OTHER SOURCES

We may obtain information about you from other sources, including through third party services and organizations to supplement other information we collect. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made public via your privacy settings. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with information about our business, products, and Services.

HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including:

Fulfilling our contract with you to provide our Services, such as:

Managing your information and accounts;

Providing access to certain areas, functionalities, and features of our Services;
Communicating with you about your Account, activities on our Services and policy changes;

- Undertaking activities to verify or maintain the quality or safety of a service or device;
- Processing your financial information and other payment methods for products or Services purchased;
- Providing advertising, analytics and marketing services;
- Providing Services on behalf of our customers, such as maintaining or servicing accounts, providing customer service, and verifying customer information;
- Processing applications and transactions; and
- Allowing you to register for events.

Analyzing and improving our Services pursuant to our legitimate interest, such as:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services and short-term, transient use, such as contextual customization of ads;
- Undertaking research for technological development and demonstration;
- Researching and developing products, services, marketing or security procedures to improve their performance, resilience, reliability or efficiency;
- Improving, upgrading or enhancing our Services or devices;
- Developing new products and Services;
- Ensuring internal quality control;
- Verifying your identity and preventing fraud;
- Debugging to identify and repair errors that impair existing intended functionality;
- Enforcing our terms and policies; and
- Complying with our legal obligations, protecting your vital interest, or as may be required for the public good.

Providing you with additional content and Services, such as:

- Furnishing you with customized materials about offers, products, and Services that may be of interest, including new content or Services;
- Auditing relating to interactions, transactions and other compliance activities; and
- Other purposes you consent to, are notified of, or are disclosed when you provide personal information.

Use of De-Identified and Aggregated Information. We may use personal information and other data about you to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create.

Sharing Content with Friends or Colleagues. Our Services may offer various tools and functionalities. For example, we may allow you to provide information about your friends through our referral services. Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services.

Processing Information on Behalf of Our Customers (as processors). Our customers may choose to use our Services to process certain data of their own, which may contain personal information. The data that we process through our Services is processed by us on behalf of our customer, and our privacy practices will be governed by the contracts that we have in place with our customers, not this Privacy Policy.

If you have any questions or concerns about how such data is handled or would like to exercise your rights, you should contact the person or entity (i.e., the data controller) who has contracted with us to use the Service to process this data. Our customers control the personal information in these cases and determine the security settings within the account, its access controls and credentials. We will, however, provide assistance to our customers to address any concerns you may have, in accordance with the terms of our contract with them. For a list of our sub-processors, contact us as described below.

Automatic Collection Technologies. We may, as well as third parties that provide content, advertising, or other functionality on the Services may, use cookies, pixel tags, local storage, and other technologies to automatically collect information through the Services. Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular site behavior, prevent fraudulent activity and improve security or that allow you to make use of our functionality;
- **Performance Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how our visitors use the Services;
- **Functionality Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;

Notice Regarding Third Party Websites, Social Media Platforms, and APIs. Our Services may contain links to other, third-party websites, and other, third-party websites may reference or link to our website or Services. These other third-party websites are not controlled by Citrine Informatics. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve and are not responsible for the privacy practices or content of such other, third-party websites or applications. Visiting these other, third-party websites or applications is conducted at your own risk.

Our Services may include publicly accessible blogs, forums, social media pages, and private messaging features. By using such Services, you assume the risk that the personal information provided by you may be viewed and used by third parties for any number of purposes. In addition, social media buttons such as Twitter and LinkedIn (that might include widgets such as the “share this” button or other interactive applications) may be on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our site. Your interactions with these features

apart from your visit to our site are governed by the privacy policy of the company providing it.

All our 3rd-party APIs are geared towards monitoring site behavior to inform Citrine's decisions that lead to better Services and enhance security. We don't perform any algorithmic personalization using a 3rd party analytics provider to show "content that is more relevant to you."

INFORMATION THAT WE SHARE WITH THIRD PARTIES

Except as provided below, we do not disclose your personal information. For a list of the categories of personal information we have disclosed about consumers for a business purpose in the past 12 months, please contact us as described below. We have not sold consumers' personal information in the preceding 12 months.

Displaying to Other Users. The content you post on the Services are displayed for other users to see. Other users will also be able to see your username and user id, unless you choose to restrict or delete that information as described below.

Information Shared with Our Services Providers. We may engage third-party services providers to work with us to administer and provide our Services. These third-party services providers have access to your personal information only for the purpose of performing services on our behalf. As required by law, we have executed appropriate contracts with the service providers that prohibit them from using or sharing your information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.

Information Shared with Third Parties. We may share aggregated information and non-identifying information with third parties for industry research and analysis, demographic profiling and other similar purposes. We utilize Google Analytics, a service provided by Google, Inc. that we use to gather information about how Users engage with our Site and Services. For more information about Google Analytics, please visit <http://www.google.com/policies/privacy/partners/>. You can opt out of Google's collection and Processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Information Disclosed in Connection with Business Transactions. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to respond to claims, legal process (including subpoenas); (ii) to protect our property, rights and safety and the property, rights and safety of a third party or the public in general; and (iii) to stop any activity that we consider illegal, unethical or legally actionable activity.

YOUR CHOICES

We offer you choices regarding the collection, use and sharing of your personal information and we'll respect the choices you make.

Electronic Communications. We may periodically send you free newsletters and e-mails that directly promote our Services. When you receive such promotional communications from us, you will have the opportunity to “opt-out” (either through your Account or by following the unsubscribe instructions provided in the e-mail you receive). We are required to send you certain communications regarding the Services and you will not be able to opt out of those communications – e.g., communications regarding updates to our Terms of Service or this Privacy Policy.

Cookies and Other Technologies. You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits.

Your Privacy Rights.

In accordance with applicable law, you may have the right to:

- **Access personal information about you** consistent with legal requirements. In addition, you may have the right in some cases to receive or have your electronic personal information transferred to another party.
- **Request correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information or we may refer you to the controller of your personal information who is able to make the correction.
- **Request deletion** of your personal information, subject to certain exceptions prescribed by law.
- **Request restriction of or object to processing of your personal information**, including the right to opt in or opt out of the sale of your personal information to third parties, if applicable, where such requests are permitted by law.

If you would like to exercise any of these rights, please contact us as described below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

If you are a California resident, you have the right not to receive discriminatory treatment by Citrine for the exercise of your rights conferred by the California Consumer Privacy Act.

DATA RETENTION

We store the personal information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

RESPONDING TO DO NOT TRACK SIGNALS

Our Site does not have the capability to respond to “Do Not Track” signals received from various web browsers.

THE SECURITY OF YOUR INFORMATION

We take reasonable administrative, physical and electronic measures designed to protect the information that we collect from or about you (including your personal information) from unauthorized access, use or disclosure. When you enter sensitive information on our forms, we encrypt this data using SSL or other technologies. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

By using the Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Services, by mail or by sending an e-mail to you.

INTERNATIONAL TRANSFER

Your personal information may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you’re located outside the United States and choose to provide your personal information to us, we may transfer your personal information to the United States and process it there. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well. Further details can be provided upon request.

OUR POLICY TOWARD CHILDREN

Our Services are not directed to children under 16 (or other age as required by local law), and we do not knowingly collect personal information from children. If you

learn that your child has provided us with personal information without your consent, you may contact us as set forth below. If we learn that we have collected any personal information in violation of applicable law, we will promptly take steps to delete such information and terminate the child's account.

SUPERVISORY AUTHORITY

If you are in the European Economic Area or the UK, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

QUESTIONS?

If you have any questions about our privacy practices or this Privacy Policy, or if you wish to submit a request to exercise your rights as detailed in this Privacy Policy, please contact us at:

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