

Privacy Statement.

Codon One.

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This Privacy Statement is drafted and managed by Codon One which has its headquarters at Jules Vandenbemptlaan 79, 3001 Leuven, Belgium.

1. Scope of the Privacy Statement.

Codon One strives to improve the lives of individuals by bringing genomics into daily clinical practice, with a focus on rare diseases. In pursuit of this objective, Codon One may process personal data of natural persons (hereinafter "Data Subject" or "you").

Codon One is committed to protecting your privacy and developing technology that gives you a powerful and safe online experience. This Privacy Statement applies to Codon One's website (<https://codon.one/>) and the delivery of our services to our customers.

This statement complies with the applicable legislation governing personal data processing and electronic communications, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data (hereinafter "GDPR" or "General Data Protection Regulation"). It contains important information on how and for what purposes Codon One, as a data controller, collects and processes personal data, and clarifies which rights you can exercise as a data subject.

2. Collection of Personal Data.

Personal data can be defined as any information by which a natural person can be directly or indirectly identified.

Codon One may collect personal data, such as your e-mail address, name, work address or telephone number.

Codon One may also automatically collect information about your computer or mobile device hardware and software when you access the website. This information can include: your IP address, browser type, domain names, operating system, access times and referring website addresses. This information is used by Codon One for the operation of the services it provides, to maintain quality of Codon One's services, and to provide general statistics regarding use of the website.

3. Processing of Personal Data.

Codon One may collect and use your personal data to operate the website and deliver the services you have requested. Codon One may also use your personal data to inform you of other products or services available from Codon One. We may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

You may provide us with your personal data in the context of the following activities, for the corresponding purposes and based on the stated legal grounds:

- **Sign up, mailing list or correspondence:** by providing your email address via the 'Sign up' or 'Mailing list' options on the website, you consent to Codon One processing your email address. If you contact us directly (by email, phone, or letter), we will process your contact details and the content of this correspondence. We only use this information to adequately address your questions or requests.
- **Applications:** by reaching out to us via our 'Let's talk!' button in the section 'We're hiring', you consent to Codon One processing your name, email address, phone number, credentials, CV, as well as the content of your correspondence with us. We use this information solely for the purpose of managing your application.
- **Sales and marketing:** Codon One may use your name and contact details for direct marketing campaigns to inform you about other products and services Codon One and its affiliates provide, and to contact potential future customers. We may also use the data to make targeted offers, e.g. via email or to display an advertisement on our own website. We will send these communications or place the advertisements based on the legitimate interest of Codon One, if we find that you are interested in, or could benefit from, our services or products.
- **Delivery of products and services:** when you buy or purchase certain products or services from Codon One, we collect your contact details and billing information. This is for the purpose of delivering our services and managing our (customer) relationship and based on your agreement with Codon One.
- **Other relationships:** we collect contact details of our current or future suppliers and partners. We process this information to enter into agreements and manage our relationships or partnerships. This processing is therefore based on the conclusion and performance of our contracts and business relationships.



4. Disclosure to Third Parties.

We refrain from disclosing or selling your personal data to third parties and publicly disclosing your personal data except in the following specific cases:

- Personal data may be shared with external services providers to which we have outsourced certain processing activities. In any case, they are limited to processing your personal data in accordance with our instructions and, if necessary, a data processing agreement will be concluded so that they are obliged to comply with all obligations required by applicable data protection laws.
- If required to do so by applicable laws or regulations.

5. International transfers.

We will comply with applicable data protection law in terms of providing adequate protection for the transfer of personal data to recipients in countries outside of the European Economic Area (“EEA”).

In case we transfer your personal data to a third country or international organization outside the EEA, we will make sure that your personal data is either transferred to third countries that are deemed to be offering an “adequate” level of protection by the European Commission (a list of adequate third countries is available on the European Commission’s website), or, alternatively, where your personal data is not sent to a country that provides an adequate level of protection, we will put in place appropriate safeguards with the entity receiving your personal data (e.g. the EU standard contractual clauses or binding corporate rules, taking into account additional requirements regarding international transfers such as supplementary measures) to ensure that your personal data remains protected in accordance with applicable data protection law.

6. Your rights as a data subject.

At all times, as a data subject, you have the possibility to exercise your rights as described in the GDPR. These rights can be exercised free of charge by completing our [Request Form](#) and sending it via e-mail to privacy@codon.one. We undertake to respond to your request within one month of receipt. We may first request additional information to confirm your identity and ensure that the request comes from you.

You can exercise the following rights:

6.1. Right of access to your personal data.

You have the right to request access to your personal data at any time, and to request a copy of the personal data that Codon One collects about you.



6.2. Right to rectification.

You have the right to have incorrect personal data corrected or incomplete personal data completed.

6.3. Right to data erasure ("right to be forgotten").

You may request to have your personal data deleted from Codon One's systems.

The request to erase your personal data cannot always be granted due to contractual or legal obligations. Codon One will observe these obligations when responding to your request.

6.4. Right to object.

You have the right to object to the processing of your personal data if the processing is based on the legitimate interests of Codon One or on grounds of public interest. We will stop processing your data unless we can demonstrate compelling legitimate grounds for further processing or for the exercise of legal claims. You may also object to the processing of your personal data for direct marketing purposes, which means that your personal data will no longer be processed for such purposes.

6.5. Right to withdraw your consent.

For the processing of your personal data collected by Codon One with your consent, you may withdraw your consent at any time. However, withdrawing your consent does not apply to processing operations previously carried out by Codon One.

6.6. Right to restriction of processing.

In certain cases, you have the right to obtain the restriction of the processing of your personal data. We will continue to store your data, but we will limit its use. For example, you can make this request if you believe your personal data is inaccurate or if the processing by Codon One is not justified. We only have to fulfil these requests in specific cases, as stipulated by law.

6.7. Right to data portability.

You have the right to obtain your personal data processed by Codon One in a structured, commonly used and machine-readable format and/or to have such data transmitted to another controller.

6.8. Right to lodge a complaint.

If at any time you believe that Codon One is infringing your privacy, you have the right to lodge a complaint with a supervisory authority. You will find a list of supervisory authorities and their contact details [here](#).



7. Retention of your Personal Data.

Codon One recognizes the importance of protecting your personal data. We will retain your personal data for no longer than strictly necessary to fulfil the purposes for which we received the data, or for the performance of a contract, or to comply with a legal obligation. The retention periods differ in terms of the type of processing activity and the purpose for which the personal data was collected.

Personal data that we collect based on your consent is retained for as long as your consent remains valid.

We keep customer and supplier information for as long as reasonably necessary to perform our agreements, to comply with our legal obligations (such as accounting and tax obligations) and to resolve disputes or enforce agreements.

In all cases, personal data may be retained for a longer period if there is a legal or regulatory reason to do so, or for a shorter period if you object to the processing of your personal data and there is no longer a legitimate reason to retain it.

We guarantee that only limited access will be provided to archived data, and that your personal data will be deleted or anonymized once the retention period has expired.

If you wish to receive more information about the retention period we apply, please contact us at the following e-mail address: privacy@codon.one.

8. Security and Confidentiality of your Personal Data.

Codon One has implemented technical and organizational security measures to prevent the destruction, loss, forgery, alteration, unauthorized access, or disclosure of your personal data to third parties and any other unauthorized processing of such data.

We have made every effort to ensure the confidentiality, integrity and availability of the information systems and services that process personal data. These measures include physical and operational security measures, access control, awareness policies and confidentiality clauses. All our employees and third parties engaged by us are obliged to respect the privacy and security of your personal data.

9. Contact Details.

If you have any comments or questions about the information in this statement, or any other issues relating to Codon One's processing of your personal data, please contact us at privacy@codon.one.

If you prefer to contact us by post, please do so at the following address:

Codon One
Jules Vandenbemptlaan 79
3001 Leuven, Belgium



10. Changes to this Privacy Statement.

We may amend or update this Privacy Statement from time to time to reflect changes in our practices regarding the processing of your personal data or changes in applicable legislation. We will do so by posting the updated version on this website. When we publish changes to our Privacy Statement, we will change the date and version number of the "last update" of our Privacy Statement. Significant changes will be notified on our homepage. Nevertheless, we encourage you to regularly read our Privacy Statement.

