

SOPHiA DDM™ Platform - Privacy Policy

WHO WE ARE

SOPHiA GENETICS SA, which is headquartered at La Piece, 12, 1180 Rolle, Switzerland, and its subsidiaries¹ (“SOPHiA GENETICS”, “we”, “us” and “our”) provide to its customers (“Customer”) a proprietary software platform (the “Platform”) that enables the Customer’s authorized users (the “Users”) to upload, visualize, and analyze digital health data.

SOPHiA GENETICS values the Users' and patients' or any other individual's (collectively the “Data Subjects”) privacy. SOPHiA GENETICS is committed to process all personal data with care, confidentiality, integrity, and transparency.

This Privacy Policy may be amended from time to time, notably to comply with applicable data protection laws, regulations, and guidelines provided by public authorities (“Applicable Data Protection Laws”).

ROLES AND RESPONSABILITIES

This Privacy Policy explains how the Data Subjects’ personal data (the “Personal Data”) are processed through the Platform. For the sake of clarity, and in accordance with Applicable Data Protection Laws, Personal Data means any information relating to an identified or identifiable natural person.

SOPHiA GENETICS’ Customers using the Platform are the data controllers, responsible for the processing of the Data Subjects’ Personal Data through the Platform.

SOPHiA GENETICS receives their instructions and acts as a data processor to process Personal Data on their behalf.

Where SOPHiA GENETICS processes Personal Data outside the scope of the instructions of its Customers, SOPHiA GENETICS is to be considered as a data controller.

¹ SOPHiA GENETICS, Inc., SOPHiA GENETICS INTERMEDIACÃO DE NEGÓCIOS EIRELI, SOPHiA GENETICS Ltd, SOPHiA GENETICS Pty Ltd, SOPHiA GENETICS SAS and SOPHiA GENETICS SRL

PERSONAL DATA WE COLLECT

Users Personal Data

What type of data are collected and processed?	Upon Customer's request, SOPHiA GENETICS creates the Users' profile and grants them access to the Platform. To create an account, Customer provides SOPHiA GENETICS with the User's name, surname, employer details, professional email address, professional phone number, and log-in details.
Why do we use them?	These Personal Data are necessary to create User's access rights to the Platform and to monitor its Platform usage. These Personal Data are also collected to improve the User's experience, Platform features, and to ensure the Platform security.
For how long do we keep the data?	The Personal Data are retained in the active database of SOPHiA GENETICS for the duration of the contract between the Customer and SOPHiA GENETICS. In addition, SOPHiA GENETICS retains personal data for the period required under Applicable Data Protection Law.

Other individuals Personal Data

What type of data are collected and processed?	Personal Data pertaining to Customers' patients or other individuals are collected directly by Customers and uploaded into the Platform by the Users. The Personal Data uploaded and processed are the following: identity (name, surname, the identifier allocated by the Customer and the identifier allocated by SOPHiA GENETICS), gender, ethnicity, city of residence, date of birth, genetic data, and health-related data, such as clinical data or medical information.
Why do we use them?	These Personal Data are collected by Customers to conduct the data analysis through the Platform. As per the contract between SOPHiA GENETICS and Customers, the Personal Data uploaded into the Platform will be processed for the performance of SOPHiA GENETICS' contractual obligations; for pseudonymization and anonymization; for statistical, scientific, or research purposes; for creating and providing Insights; for providing biomarker identification; for researching, developing, maintaining, or promoting the SOPHiA GENETICS' technology, products, or services; or to comply with Applicable Data

Protection Law.

For how long do we keep the data?

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LEGAL BASIS

Customers inform, collect, and process the User's Personal Data based on the **contractual** relationship between them.

Customers inform, collect and process the patients and other individuals' Personal Data based on the **consent** provided by them.

SOPHiA GENETICS also processes Personal Data for its **legitimate interests** to improve, develop, and promote products and/or services, compiling statistics, conduct scientific and/or medical research. SOPHiA GENETICS also processes Personal Data to comply with its **legal and regulatory obligations**.

ACCESSING AND SHARING PERSONAL DATA

Access to Personal Data

The Users have access to Personal Data through the Platform.

SOPHiA GENETICS' employees have access to Personal Data to provide the services associated to the Platform, such as support activities, maintenance operations, as well as for compiling statistics and generating insights.

Sharing Personal Data

As a general rule, we do not provide, sell or lease Personal Data to any third parties without prior consent of our Customers and/or the Data Subject.

From time to time, we need some help to propose the best user experience. When this happens, we rely on various third-party service providers and contractors to provide services that support the Platform maintenance and development, including, without limitation, maintenance and security of our databases, and performance of data analysis. Such third parties may have access to Personal Data for the purpose of performing the services for which they have been engaged. However, such service providers shall remain under contractual obligations, particularly confidentiality obligations, for as long as they hold relevant Personal Data.

Before we share any data to third parties, we make sure that said third parties, which receive the data, offer the necessary standards of data protection required by Applicable Data Protection Law, either due to mandatory legal requirements or due to data protection agreements or contractual instruments signed with the third parties in question.

INTERNATIONAL DATA TRANSFER

Our headquarter is in Switzerland and we work with Customers all around the world. SOPHiA GENETICS collects, processes, and stores Personal Data in the different region of its Customers. We maintain data storage servers in the following regions:

- European Union: France and the Netherlands (certified “*Hébergeur de Données de Santé*” servers)
- Switzerland
- United States of America
- Canada
- Brazil
- Turkey
- Australia

Where international data transfers could occur, they are undertaken in accordance with Applicable Data Protection Law. We implement appropriate safeguards to protect Personal Data when we transfer them such as data transfer agreements that incorporate standard contractual clauses.

COMPLIANCE WITH LAW & REGULATIONS

SOPHiA GENETICS cooperates with government and law enforcement officials and private parties to enforce and comply with Applicable Data Protection Law. We may be required to disclose the Personal Data of an individual in response to a lawful request by public authorities, to meet national security, law enforcement or other legal requirements.

DATA SECURITY

We are committed to keeping Personal Data secure in our daily activity. We always consider the context and purposes of processing as well as the likelihood and impact of risks relating to Personal Data to adapt our security measures. Therefore, we implement appropriate technical and organizational measures and apply strict procedures and security features to prevent unauthorized access, loss, or damage to Personal Data. SOPHiA GENETICS implements appropriate technical and organizational measure in accordance with Applicable Data Protection Law. Such measures include, without limitation:

- ISO27001 certification;

- Physical access control;
- Logical access control;
- Login information regulated with complex password and token;
- End-to-end encryption;
- Pseudonymization and de-identification of genetic and other health related data;
- Segregation of data;
- Confidentiality undertaking for all representative who access the data
- For French customers all the data are hosted on an “Hébergeur de données de santé” certified server.

We always use extra caution when we entrust third parties to handle Personal Data and we require that they abide by the same standards as we apply.

YOUR RIGHTS

Taking into account the nature of the processing and the location of Customer, SOPHiA GENETICS assists its Customers to respond to Data Subjects rights requests under Applicable Data Protection Law to:

- Confirm the existence of data processing;
- Access Personal Data;
- Review, update, correct, delete, restrict, block, object Personal Data;
- Request data portability
- Request information from public and private entities with which we have shared Personal Data;
- Request information on the possibility of not providing consent and on the consequences of refusal;
- Revoke consent.

CONTACT US – DATA PROTECTION OFFICER

If you have questions regarding this Privacy Policy or how Personal Data are processed, please contact SOPHiA GENETICS’ Data Protection Officer, at SOPHiA GENETICS SA, La Piece, 12, 1180 Rolle, Switzerland or via email at privacy@sophiagenetics.com.

COMPLAINT TO AUTHORITIES

You may file a complaint with your local data protection authority if you consider that any processing of Personal Data infringes upon the requirements of the Applicable Data Protection Laws. However, we invite you to contact us prior to doing so.

CHANGES TO PRIVACY POLICY

This Privacy Policy is effective as of the date of its last revision. We reserve the right to change this Privacy Policy at any time. When we make changes, we will post the changed Privacy Policy on the Platform and our Website, and it will become effective immediately.

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