

SOPHiA DDM™ Platform - Privacy Policy

WHO WE ARE

SOPHiA GENETICS is committed to processing all personal data with care, confidentiality, integrity, and transparency.

SOPHiA GENETICS SA, headquartered at La Piece, 12, 1180 Rolle, Switzerland, has the following subsidiaries:

- SOPHiA GENETICS, Inc., located at 401 Park Drive, 5TH Floor, Boston, MA 02215, USA.
- SOPHiA GENETICS S.A.S, located at Technopole Izarbel, 158 allée Fauste d'Elhuyar 64210 Bidart, France.
- SOPHiA GENETICS S.R.L., located at Via Michelangelo Buonarroti, 39, Milano, 20145, Italy.
- SOPHiA GENETICS LTD, located at 60 Windsor Avenue, London, SW19 2RR, United Kingdom.
- SOPHiA GENETICS INTERMEDIÇÃO DE NEGÓCIOS EIRELI, located at Av. Lauro de Gusmão Silveira, nº 479, sala 01, Jardim São Geraldo, CEP 07140-010, na cidade de Guarulhos, Estado de São Paulo, Brazil.
- SOPHiA GENETICS Pty Ltd, located at Level 14, 12 Creek Street, Brisbane City, QLD 4000, Australia.
- SOPHiA GENETICS GmbH, located at Engelbergerstraße 19, 79106 Freiburg, Germany.

SOPHiA GENETICS SA and its subsidiaries (“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.

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.

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?

The data are retained in 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.

LEGAL BASIS

Performance of a contract: Customers inform, collect, and process the User's Personal Data based on the contractual relationship between them.

Patients and individuals' consent: Customers inform, collect and process the patients and other individuals' Personal Data based on the consent provided by them. This may include disclosing the Personal Data to third parties to fulfill the purposes outlined above, or using the data for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by patients and individuals.

SOPHiA GENETICS' legitimate interest: 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' compliance with legal obligations: 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 with the Platform, such as support activities, maintenance operations, as well as 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.

SOPHiA GENETICS works with third-party service providers and contractors to provide services that support the Platform maintenance and development, including, without limitation, Cloud service hosting, maintenance, data security, data computing and analysis, and customer support platform service. Such third parties may have access to Personal Data to perform 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 with third parties, we make sure that the third parties that 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 regions 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
- Japan
- Australia
- United Arab Emirates

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.

DATA PRIVACY FRAMEWORK

Framework’s Principles

SOPHiA GENETICS, Inc., a subsidiary of SOPHiA GENETICS SA, complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the

Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. SOPHiA GENETICS, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. SOPHiA GENETICS, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Data Sharing and Transfer

As described above, we may share Personal Data, as defined in the EU's General Data Protection Regulation (GDPR) with service providers we have retained to perform services on our behalf. When such service providers are located in other jurisdictions, we ensure they are (a) subject to GDPR, as applicable, (b) subscribe to the Data Privacy Framework program principles, or (c) contractually agree to provide at least the same level of protection for Personal Data as is required by the relevant DPF program. In the context of such an onward transfer to a third party, SOPHiA GENETICS, Inc. is responsible for and may be liable for processing Personal Data it receives under the DPF programs and subsequently transfers onward. If there is any conflict between the policies in this Data Privacy Policy and data subject rights under the EU-U.S., UK extension and Swiss-EU DPF Principles, the DPF Principles shall govern. To learn more about the DPF program, and to view our certification page, please visit <https://www.dataprivacyframework.gov/>.

Raise a complaint

In compliance with the DPF Principles, SOPHiA GENETICS, Inc. commits to resolve complaints about privacy and our collection or use of personal information transferred to the United States under the DPF. European Union, United Kingdom (including Gibraltar), and Switzerland, individuals with DPF inquiries or complaints should first contact SOPHiA GENETICS, Inc. at privacy@sophiagenetics.com.

Independent Recourse Mechanism

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, SOPHiA GENETICS, Inc. commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

Arbitration

If a DPF related complaint cannot be resolved through the above channels, under certain conditions, one may invoke arbitration for some residual claims not resolved by other redress mechanisms. For additional information please visit the relevant [link](#).

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.

Additionally, SOPHiA GENETICS is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

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:

- ISO 27001, ISO 27017, ISO 27018 certifications;
- 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.

Please refer to the Cloud Service Technical Documentation, available at: <https://www.sophiagenetics.com/legal-documents/> (as amended from time to time), for further details.

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;
- choose (opt out) whether their personal information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized;
- 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.

COMPLAINT TO AUTHORITIES

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

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.

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.