

Notice of Website Privacy Practices

1. Introduction

Pacific Edge Ltd. together with its affiliates, including Pacific Edge Diagnostics USA, Ltd. and Pacific Edge Diagnostics New Zealand Ltd. (collectively, “Pacific Edge”, “we”, “us” or “our”), is committed to protecting the privacy and security of Personal Information collected through our websites (collectively, the “Websites”).

This Notice of Website Privacy Practices explains how we collect, use, disclose, store, and protect Personal Information when you visit or interact with our Websites.

For the purposes of this Notice, “Personal Information” means information that identifies, relates to, or could reasonably be linked to an identifiable individual. Pacific Edge Ltd is the controller of Personal Information collected through the Website(s). Local affiliates may act as processors or joint controllers, depending on jurisdiction.

This Notice is provided in accordance with applicable privacy and data protection laws, including:

- New Zealand Privacy Act 2020 and Health Information Privacy Code
- Singapore Personal Data Protection Act 2012
- European Union and United Kingdom General Data Protection Regulation (GDPR)
- United States HIPAA Privacy and Security Rules and HITECH Act (where applicable)

Please note that this Notice applies only to information collected through the Websites.

For information about how we use and/or disclose the health information of people in the United States of America, please refer to our US Notice of Patient Privacy Practices.

For information about how we use and/or disclose the health information of people in the Asia Pacific Region, including New Zealand, Australia and Singapore, please refer to our APAC Notice of Patient Privacy Practices.

2. Intended Audience

The Websites are intended for:

- Healthcare professionals, and
- Adults seeking information about Pacific Edge and its products and services.

While we do not knowingly collect Personal Information from children, age thresholds may vary by jurisdiction. If you believe that we have inadvertently collected Personal Information from a child, please contact us using the details in Section 12.



3. Information We Collect Automatically

When you visit the Websites, we may automatically collect certain technical and usage information, including:

- Date, time, and duration of visits
- Pages viewed and referring URLs
- Browser type, operating system, and device information
- IP address and general location data
- Website interaction and performance data

This information may be collected using cookies or similar technologies and may involve third party service providers acting on our behalf. It is primarily used in aggregated or de identified form to understand how the Websites are used and to maintain their performance and security.

4. Information You Provide Voluntarily

You may choose to provide Personal Information when interacting with the Websites, including when you:

- Complete a contact or enquiry form
- Request information or materials
- Subscribe to updates or communications
- Provide feedback or submit questions

This information may include your name, professional role, organisation, email address, phone number, and any information you choose to include in your communication.

5. How We Use Personal Information

We may use Personal Information collected via the Websites for the following purposes:

- Responding to enquiries and providing requested information
- Communicating with you about Pacific Edge products or services, where you have requested such information
- Supporting clinician or patient education initiatives
- Improving and maintaining the Websites
- Managing customer relationships and feedback
- Ensuring security, compliance, and regulatory obligations
- Enforcing Website terms and conditions

We do not use Website Personal Information for automated decision making or profiling that produces legal or similarly significant effects on individuals.



6. Legal Basis for Processing (GDPR)

Where the GDPR applies, we process Personal Information on one or more of the following lawful bases:

Your consent

- Our legitimate interests in operating, securing, and improving the Websites
- Compliance with legal or regulatory obligations
- Performance of a contract or pre contractual steps, where applicable

7. Cookies and Similar Technologies

The Websites use cookies and similar technologies to ensure functionality, security, and performance, and to understand how visitors interact with the Websites.

Some cookies are strictly necessary for the operation of the Websites. Other cookies (such as analytics or performance cookies) are optional.

Where required by law, non-essential cookies will only be placed on your device after you have provided your explicit consent through our cookie preference tool.

You may manage or withdraw your consent at any time via your desktop or mobile browser security and privacy settings.

8. Direct Marketing Communications

Pacific Edge does not sell or share Personal or Sensitive Information with 3rd parties as defined under the local or international jurisdiction the data is collected.

We will only send you marketing or promotional communications where you have explicitly requested or consented to receive them. You may opt out at any time by using the unsubscribe link included in our communications or by contacting us directly.

Where we engage third party service providers to send communications on our behalf, they are contractually required to protect your Personal Information and use it only for authorised purposes.

9. Disclosure to Third Parties

We may disclose Personal Information to third parties in limited circumstances, including:

- To trusted service providers who support Website hosting, analytics, communications, or IT services
- Where required by law, regulation, or lawful request
- In connection with a corporate transaction such as a merger, acquisition, or asset sale

All third party service providers are required to implement appropriate safeguards to protect Personal Information.



10. International Transfers

Personal Information may be transferred to and processed in countries outside your country of residence.

Where required by law, Pacific Edge implements appropriate safeguards for international transfers, including Standard Contractual Clauses, approved by relevant regulators, or other lawful transfer mechanisms, to ensure that Personal Information remains protected.

11. Data Retention and Security

We retain Personal Information only for as long as reasonably necessary to fulfil the purposes described in this Notice and to meet legal or regulatory requirements.

Pacific Edge maintains reasonable technical and organisational security measures to protect Personal Information from loss, unauthorised access, use, modification, or disclosure. However, no internet based system can be guaranteed to be completely secure.

In the event of a data breach involving Personal Information that poses a risk to individuals, Pacific Edge will notify affected individuals and relevant authorities in accordance with applicable law.

12. Your Privacy Rights

Privacy rights vary depending on your location. Individuals located in the European Union or United Kingdom have the right to withdraw consent at any time and to lodge a complaint with their local supervisory authority.

Subject to applicable law, you may have the right to:

- Access your Personal Information
- Request correction of inaccurate or incomplete information
- Request deletion of Personal Information
- Object to or restrict certain processing activities
- Request a copy of your Personal Information in a portable format
- Lodge a complaint with a relevant data protection authority

To exercise these rights, please contact us using the details below.

13. External Websites

The Websites may contain links to third party websites. Pacific Edge is not responsible for the privacy practices or content of those websites. We encourage you to review the privacy policies of any external sites you visit.



14. Changes to This Notice

We may update this Notice from time to time. Any changes will be published on the Websites and will take effect from the date of publication. Continued use of the Websites after an update constitutes acceptance of the revised Notice.

15. Contact Us

If you have questions about this Notice or our privacy practices, or wish to exercise your privacy rights, please contact:

Privacy Officer / Data Protection Officer

Pacific Edge

Email: privacy@pacifiedgedx.com

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