

Segterra, Inc. (“GoalGetter”) Privacy Policy

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Introduction

Segterra ("Segterra," "InsideTracker," GoalGetter," "us," "our" or "we") recognizes the importance of privacy. We respect your desire to store and access your information in a private and secure manner. This Policy explains how we handle your Personal information and Genetic Information. Your Personal Information is data that could be used to identify you. Your Genetic Information is data related to your genotype for a specific set of genes. We are committed to providing you a secure, user-controlled website (www.insidetracker.com/goalgetter or the "website") for the use of our services (each a "service," and collectively the "services"). At the same time, you share responsibility for maintaining privacy and security. For example, we ask you to keep your password secure. Do not share it with any third parties. We urge you to read this Privacy Policy carefully.

The Policy applies to all new and existing GoalGetter users. To use the GoalGetter service, you must agree to the Privacy Policy. You may not use the service if you do not agree to the Privacy Policy because it is part of the Terms of Service (“Terms”). Any capitalized terms not defined in the Privacy Policy have the same meaning as those in the Terms.

Our [Terms of Service](#) explains that, by using our website and signing up for services provided by GoalGetter or on our behalf by third parties with whom we contract, you are allowing us to collect, use and process your Personal Information and Genetic Information according to the Terms, the Informed Consent and this Privacy Policy. If you have any questions about this Policy, please contact us at goalgetter@insidetracker.com. If you do not agree with the terms of this Privacy Policy, please do not use the website or services.

By voluntarily giving us Personal Information and agreeing to have Helix transmit your genetic data to us, you are consenting to our use of it in accordance with this Privacy Policy and our Informed Consent. If you give Personal Information to Segterra, you agree that such Personal Information may be transferred from your current location to the offices and servers of Segterra and third parties we authorize.

At no time shall Personal Information or genetic data collected from you in accordance with this Privacy Policy, or any information or materials derived from such Personal Information or genetic data, be deemed to be an electronic health record or an electronic medical record for any purpose whatsoever under any law or regulation, including without limitation for purposes of compliance with the Health Insurance Portability and Accountability Act of 1996.

Personal information we collect

Segterra collects several types of Personal Information. Personal Information is information that could be used to identify you, either alone or in combination with other information. We collect such information from you when you purchase our services, and use the website. You will also need to provide such information when you create a personal account and complete surveys and forms. When you communicate with us or request information from us we will collect Personal Information from you. Personal Information collected online can be combined with Personal Information collected offline. We collect five primary types of Personal Information through our services and website.

1. **Registration Information** is information that we collect from you when you register for GoalGetter services. Examples of such information include your name, age, login credentials, and contact information, such as an email address. We use this information to deliver our service to you, to communicate with you, and to verify your identity.
2. **Genetic information** is data related to your genotype for a specific set of genes related to healthy aging, nutrition and physical activity. Helix will provide GoalGetter with your genotype information for this specific set of genes. GoalGetter analyzes your data using an algorithm that determines your genetic potential for certain traits. GoalGetter may use your de-identified data for research and development to improve future products. For research that we hope to publish in scientific publications, we will request separate permission through a Research Consent document to use your de-identified Genetic Information. Any Research Consent is optional and voluntary. You will not be required to agree to a Research Consent document in order to use the website or services.
3. **Self-Reported Information** includes information you provide in the GoalGetter questionnaire or in any other website surveys or forms, such as sex, body weight, height, diet, etc. We may use your Self-Reported Information in a de-identified way for Segterra research.
4. **User Content** is all information other than Genetic Information or Self-Reported Information provided by the users of the GoalGetter services and transmitted, whether publicly or privately, to Segterra. User content may include data, text, software, music, audio, photographs, graphics, video, messages, or other materials. For example, user content includes posts made to GoalGetter community forums or emails to customer support.
5. **Web Behavior Information** is information on how you use the website (e.g. browser type, domains, page views). We may collect this information through log files, cookies, and web beacon, analytical and advertising technologies.

If you have purchased GoalGetter as a gift for someone else, any information you provide about the gift recipient will be used only as needed to deliver the gift. Your gift recipient must create their own account. GoalGetter will not share any Personal Information of the gift recipient with you.

How we use Registration Information

We use your Registration Information to authenticate your website visits and usage and to enable your purchases. We also use it to communicate with you about information, services, and products that you have requested, and to manage and improve our website, software, and services. We may also use this information to offer you services and products or invite you to take part in specific research projects. We give you the opportunity to opt out of optional communications, either through the GoalGetter services or by contacting us at goalgetter@insidetracker.com.

How we use Genetic Information and Self-Reported Information

We use your Genetic Information and Self-Reported Information to provide you with GoalGetter analysis. In addition, this information helps us to customize your user experience and enhance our services. Self-Reported Information is used to customize your user experience.

Research and Scientific Publications

We may include your de-identified Self-Reported Information in disclosures to third parties for the purpose of research and development (“R&D”) to improve our services. This information will be shared only as part of a de-identified summary of results to minimize the chance that your Personal

Information will be exposed. No identifying information will be shared without your prior knowledge and consent.

In the future, we may ask permission to use your de-identified Genetic Information for research that we hope to publish in scientific publications. If you choose to give this permission, you will agree to a Research Consent document. The Research Consent document is optional and voluntary. You may use the website or services without agreeing to the Research Consent document. Segterra research is intended to advance wellness and nutrition knowledge and to create, commercialize, or undertake activities toward the practical applications of this learning to the improvement of health care. Our research partners may include commercial or non-profit organizations that conduct or support medical research or conduct or support the development of drugs or devices to diagnose, predict, or treat health conditions.

How we use User Content and Web Behavior Information

We use User Content to provide our services and improve the overall user experience. For example, posts made to the Segterra community forums are publicly displayed to other users. Web behavior information is collected through log files, cookies, and web beacon technology during a visit to the website. Web behavior information is used to improve our services and the overall user experience. We may also use this information to offer you products and services that we think you may be interested in.

Log files

When users visit the website, we gather certain information automatically and store it in log files. This information may include Internet Protocol (IP) addresses, browser type, Internet service provider, referring/exit pages, operating system, date/time stamp, and clickstream data (i.e. a list of pages or URLs visited). This information is not designed to identify individual users. We use it to analyze trends, run the website, track users' movements around the website, and gather demographic information about our user base as a whole. We may, in some cases, need to review this automatically collected data in combination with specific registration information to identify and resolve issues for individual users, detect fraud, etc.

Cookies

Our website uses cookies. A cookie is a small text file that is stored on a user's computer when visiting certain websites. We use both session cookies and persistent cookies to make it easier for you to navigate the website, improve the security of your Personal Information, enhance the functionality of certain features, and improve performance. The cookies we use enable secure access to your account when you are signed in to your account. These cookies are only applicable within our website. A session cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's help file. However, if you set your browser to reject cookies, your ability to use our website will be significantly impaired. In particular, you will not be able to access any part of our website that requires a sign-in, such as your account.

Web beacons

A web beacon is a clear graphic image that is loaded by your web browser when it accesses a website and that records a user's visit to a particular web page. We, or third parties that work for us, may place web beacons on our website, in our emails, and in our advertisements that appear on other

websites or in emails sent by others that mention our products and services with our permission. The purpose of our web beacons is to support operation of our website and to offer additional products and services through targeted advertisements. For example, we may use beacons to determine when someone views a web page, count how many individuals visit our website after clicking advertisements placed on other websites, or count how many people have purchased products from our website after viewing an advertisement we placed. Web beacons may also help us determine the effectiveness of an email campaign because the beacons can count the number of individuals who open an email or forward it to others. We use this web behavior information to better tailor our marketing to you and may also use this information to customize content on our website, enable a shopping cart, or conduct research. Third parties only collect anonymous web behavior information through the use of web beacons, allowing statistical analysis relating to the performance of our advertising. If you wish to disable web beacons, it is possible to prevent your browser from loading them, although there is not currently a standard method for doing so.

Information sharing

We give you the ability to connect with other individuals who have GoalGetter accounts through our community forums and other sharing features. For some features, opt-out is required to avoid notifications. In addition, you may choose to disclose, through other means not associated with us, any part of your Personal Information and/or Genetic Information. You may share this information with friends or family members, groups of individuals, third-party service providers, doctors or other health care professionals, or other individuals. We recommend that you make such choices carefully. Personal information and especially Genetic Information, once released or shared, can be difficult to contain. The Genetic Information Nondiscrimination Act of 2008 (GINA) says that you are not required to share your with your employer or your health insurance company. Other companies, such as life insurance, long-term care insurance, and disability insurance companies, may ask you to share your genetic information. Always be careful with whom you choose to share your genetic information.

We will have no responsibility or liability for any consequences that may result because you have released or shared Personal Information and/or Genetic Information with a third party. It is your responsibility to share Personal Information and Genetic Information only with people you know and trust.

Children

The website and services are intended for adults. Users under the age of eighteen (18) are not permitted to use the GoalGetter services.

Information disclosure

As a general rule, we will not disclose your individual-level Personal Information to any third party, except under the following circumstances:

- To partners or service providers (e.g., credit card processors or our contracted blood test laboratory) who process or store the information in order to provide you with our services.
- When we are required to do so by law (see the section below titled "Information disclosure required by Law").
- If in the future you choose to agree to the Research Consent document, we may disclose de-identified Self-Reported Information intended to be published in a peer-reviewed scientific

journal to research collaborators or as a result of publication ONLY in the form of anonymized statistical data.

- If in the future you choose to agree to the Research Consent document, then third-party research contractors who have been screened by Segterra may be granted access to your de-identified Genetic and Self-Reported information as long as they follow our rules in conducting research.
- Segterra may enter into commercial arrangements to enable partners to provide our services to their customers or to provide you access to their products and services. We will not provide any individual-level Personal Information to these commercial partners without your explicit consent. We may disclose Genetic or Self-Reported Information in aggregate (which may include your non-identifiable Genetic or Self-Reported Information) to these commercial partners even if you have not given consent for your data to be used in Segterra Research.

Information disclosure required by law

Under certain circumstances, Personal Information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders. You acknowledge and agree that Segterra is free to preserve and disclose any and all Personal Information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal process (such as a judicial proceeding, court order, or government inquiry) or obligations that Segterra may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the Segterra Terms of Service (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of Segterra, its employees, its users, its clients, and the public. In such event we will notify you through the contact information you have provided to us in advance, unless doing so would violate the law or a court order.

Linked websites

We may provide links to third-party websites operated by organizations not affiliated with Segterra. Segterra does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the Privacy Policies of each and every website that you visit. This Privacy Policy applies solely to information collected by Segterra.

Closing or correcting your account

Your use of the GoalGetter service is voluntary. It is your choice whether to participate or not. You may cancel the service at any time. If for any reason you believe that your use is anything but voluntary, please stop all use of the service.

If you no longer wish to use GoalGetter, you may close your account by sending a request to Customer Support at goalgetter@insidetracker.com. When closing an account, we remove all Genetic Information within your account within thirty (30) days of receiving your request. However, Genetic Information or Personal Information that you have previously provided will not be removed from ongoing or completed internal R&D or business activities that use the information (as de-identified statistical information). Similarly, if in future you have separately agreed to the Research Consent document, any genetic information that you have previously given consent to use will not be removed from ongoing or completed studies. If you wish to have your data removed from our partner, Helix OpCo, LLC, you must contact them separately. In addition, we keep limited information related to your order history (e.g., name, contact, and transaction data) for accounting and compliance purposes.

If your Personal Information changes, you may correct or update it on your Profile page. You may also correct or reset Personal Information entered into a survey, form, or feature by emailing a request to customer support at goalgetter@insidetracker.com and including the name of the specific survey, form, or feature.

Security

We take seriously the trust you place in us. Although we cannot guarantee that your data will be 100% secure, we work hard to protect your data. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, we use a range of physical, technical, and administrative measures to safeguard your Personal Information, in accordance with current technological and industry standards. Please recognize that protecting your Personal Information is also your responsibility. We ask you to safeguard your password, secret questions and answers, and other authentication information you use to access our services. You should not disclose your authentication information to any third party. You should also immediately notify us of any unauthorized use of your password. We cannot secure Personal Information that you release on your own or that you request us to release.

We reserve the right to update our privacy and security policies and practices from time to time at our sole discretion. We will employ commercially reasonable technical and organizational safeguards against unauthorized disclosure or access to your data or other personally identifiable information about you, consistent with our Privacy Policy. HOWEVER, YOU ACKNOWLEDGE THAT SECURITY SAFEGUARDS, BY THEIR NATURE, ARE CAPABLE OF CIRCUMVENTION AND SEGTERRA DOES NOT AND CANNOT GUARANTEE THAT PERSONALLY IDENTIFIABLE INFORMATION ABOUT YOU WILL NOT BE ACCESSED BY UNAUTHORIZED PERSONS CAPABLE OF OVERCOMING SUCH SAFEGUARDS. IN PARTICULAR, OUR SITE MAY BE USED TO ACCESS AND TRANSFER INFORMATION, INCLUDING PERSONALLY IDENTIFIABLE INFORMATION ABOUT YOU OVER THE INTERNET. YOU ACKNOWLEDGE AND AGREE THAT SEGTERRA DOES NOT OPERATE OR CONTROL THE INTERNET AND THAT UNAUTHORIZED USERS (SUCH AS HACKERS) MAY USE VIRUSES, WORMS, TROJAN HORSES, KEYSTROKE LOGGERS AND OTHER UNDESIRABLE DATA AND SOFTWARE TO OBTAIN ACCESS TO OR DAMAGE OUR SITE OR TO ACCESS PERSONALLY IDENTIFIABLE INFORMATION ABOUT YOU. Furthermore, we cannot be responsible for any personally identifiable information about you that you release on your own, or that you request or authorize us to release.

Business transitions

If Segterra goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. This Privacy Policy shall be applicable through any business transition until such time as you are notified of the applicability or institution of a new privacy policy. If you disagree with the new privacy policy, you may close your account.

How to contact us

If you have any questions regarding our Privacy Policy and how Segterra handles your Personal Information or your Genetic Information, or you wish to request changes to your settings, please email goalgetter@insidetracker.com.