

PSYNOMICS PRIVACY POLICY

Psynomics, Inc. ("**Psynomics**," "**we**" or "**our**") recognizes that medical privacy is essential and is dedicated to protect the privacy of its users ("**users**," "**you**" or "**your**") both on- and off-line. We understand that genetic information is very personal, even in the context of your own family members. We are also aware of your concerns regarding the potential for genetic information being misused by insurers and/or employers. Psynomics has created a framework uniquely designed for the genetic testing service available through the Psynomics website. Our website is supported by advanced technology that seeks to secure your interactions with Psynomics. We believe that your genetic information is your property, and it is your right as a consumer to be able to confidentially obtain and control this information. Because the success of Psynomics is dependent on building and maintaining goodwill with our customers, we are committed to implementing measures designed to protect your privacy. Moreover, we see it as our responsibility to help set an example and establish the standards for medical privacy on the Internet.

Although Psynomics respects your privacy, we do collect information from you. This Privacy Policy governs your interaction with the Psynomics website, and your registration for and use of Psynomic's service. By using the Psynomics website, you agree to the collection and use of information as set forth in this Policy. If you do not agree to this Policy, please do not use the Psynomics website. This Policy is the sole authorized statement of our practices concerning the collection, use and protection of personal information through the Psynomics website. Except as set forth within this Privacy Policy and our Terms of Service and other published guidelines, we do not release Personally Identifiable Information about our users without their permission.

1. INTRODUCTION

While you may use some of the functionality of the Psynomics website without registration, some of the specific tools and services require registration. If you do not use the tools, features or services offered on or through the Psynomics website, the only information we collect will be Non-Personal Information (i.e., Information that is not traceable back to you and cannot be used to identify you). Non Personal Information includes information such as the web pages that you have viewed through the use of Cookies (i.e., Small data files that are stored on the hard drive of a computer used to view websites that are accessible only by the party or site that placed the Cookie on the hard drive.). If you choose to register with our website for certain tools and/or services, we require you to submit Personally Identifiable Information (i.e., Information that can be traced back to you. Personally Identifiable Information includes information such as your name, home address, telephone number and email address). You are responsible for ensuring the accuracy of the Personally Identifiable Information you submit to Psynomics. Inaccurate information will affect the information you receive when using our website and tools and our ability to contact you. For example, your

email address should be kept current because that is the primary manner in which we communicate with you.

2. THE INFORMATION WE GATHER

Psynomics gathers three types of information about users:

2.1. Non-Personal Information. When users come to the Psynomics website, we collect and aggregate Non-Personal Information indicating, among other things, which pages of our website were visited, the order in which they were visited and which hyperlinks were "clicked." Collecting such information involves the logging of the IP addresses, operating system and browser software used by each user to the Psynomics website. Although such information is not Personally Identifiable Information, we can determine from an IP address a user's Internet Service Provider and the geographic location of his or her point of connectivity.

2.2. Personally Identifiable Information. We collect Personally Identifiable Information that you provide to us when you order genetic tests made available by Psynomics, sign-up for email messages, or leave us a return phone number and/or name through our customer service number. Among other things, we use the Personally Identifiable Information that you provide to respond to your questions, provide you the specific services you select, send you email messages about website maintenance and updates, and inform you of significant changes to this Privacy Policy.

(a) Genetic Test Orders. When ordering a genetic test, users are required to provide Psynomics with Personally Identifiable Information as part of the billing process. Psynomics uses this Personally Identifiable Information to process the order and to send the user the test kit that is needed to conduct the particular genetic test.

(d) Email Messages You Send to Psynomics. This Privacy Policy does not protect you when you send Personally Identifiable Information, Personal Health Information, other information, feedback, suggestions, content, business ideas, concepts or inventions to Psynomics by email. If you want to keep Personally Identifiable Information, Personal Health Information, other information, feedback, suggestions, content, business ideas, concepts or inventions private or proprietary, do not send them in an email message to Psynomics. We try to answer every email within 48 business hours, but are not always able to do so.

2.3. Testimonials. In order to help our users determine whether or not they would find value from ordering our tests or using our services, we collect and post, with permission of our customers, testimonial statements. From time to time testimonial statements are published on our website. These statements are published with the customer's initials and their state of residence or their name, depending on their personal preference.

3. HOW WE USE (AND DO NOT USE) THE INFORMATION WE GATHER

Please take some time to familiarize yourself with the different ways Psynomics uses the information that it gathers.

3.1. Non-Personal Information. Psynomics uses Non-Personal Information in aggregate form to build higher quality, more useful services by performing statistical analyses of the collective characteristics and behavior of our users, and by measuring demographics and interests regarding specific areas of the Psynomics website.

3.2. Personally Identifiable Information. This Privacy Policy serves as notice that Psynomics collects Personally Identifiable Information in the manners described above. Except as set forth in this Privacy Policy or as specifically agreed to by you, Psynomics will not disclose any Personally Identifiable Information it gathers from you on our website. Psynomics will only release Personally Identifiable to third parties: (a) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order; or (b) in special cases, such as a physical threat to you or others. In the event that we are legally compelled to disclose your Personally Identifiable Information to a third party, we will attempt to notify you unless doing so would violate the law or court order. We cooperate with law enforcement agencies in identifying those who may be using our servers or services for illegal activities. We also reserve the right to report any suspected illegal activity to law enforcement individuals or entities for investigation or prosecution. Finally, we may disclose Personally Identifiable Information and Personal Health Information as described below.

(a) Disclosure to Psynomics Operations and Contractors. Psynomics operations and contractors include vendors and suppliers that provide us with technology, services, and/or content related to better operation and maintenance of our website. Access by these contractors to either your Personally Identifiable Information is limited to the information reasonably necessary for the contractor to perform its limited function for Psynomics. We also contractually require that our operations and maintenance contractors not use or disclose your Personally Identifiable Information for any purpose other than providing us with products and services.

(1) Agents. We use an outside shipping company to fulfill orders, and a credit card processing company to bill you for goods and services. These companies do not retain, share, store, or use Personally Identifiable Information for any other purposes.

(2) Service Providers. We use other parties such as PayPal.com and FedEx.com to provide e-commerce services on our site. When you order a product from us we will share your Personally Identifiable Information (i.e.- shipping, billing and credit card information) as is necessary for them

to provide payment and shipping services. These contractors have access to your email address to send communications to you on our behalf, such as confirmation of a purchase and shipping confirmation. These third parties are prohibited from using your Personally Identifiable Information for any other purpose.

(b) Disclosure to Genetic Testing Labs. Psynomics does not disclose your Personally Identifiable Information to any genetic testing lab that performs the genetic tests that you order through the Psynomics website. The only information that Psynomics will provide to any genetic testing lab on your behalf is your unique Order ID Number.

4. CHILDREN

We are committed to protecting the privacy of children. Neither Psynomics nor any of its services are designed or intended to attract children under the age of 18. We do not collect Personally Identifiable Information from any person we actually know is under the age of 14. A parent or guardian, however, may do any of the following things on behalf of his or her child, if over the age of 13 and under the age of 18: (a) order genetic tests; and (b) register to receive communications. The parent or guardian assumes full responsibility for ensuring that the information that it provides to Psynomics about his or her child is kept secure and that the information submitted is accurate.

5. LINKED SITES

For your convenience there are links to websites operated by companies other than Psynomics ("**Third Party Websites**") that we believe may be of interest to you. Psynomics does not disclose your Personally Identifiable Information to these Third Party Websites. Psynomics does not endorse and is not responsible for the privacy practices of these Third Party Websites. If you choose to link to one of these Third Party Websites, you should review the privacy policy posted on this other website to understand how that Third Party Website collects and uses your Personally Identifiable Information.

6. EMAIL AND MAILING LIST POLICY

We use your e-mail, mailing address, and phone numbers only to confirm your order or communicate with you regarding your case, questions or requests, or other products or services you may find useful. Except as specified in our Privacy Policy, we do not share our email list, mailing list, or telephone numbers with anyone for third-party marketing or promotional use.

Service-related Announcements

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email.

Choice/Opt-out

We provide you the opportunity to 'opt-out' of having your Personally Identifiable Information used for direct marketing purposes. For example, if you purchase a product/service but do not wish to receive any additional marketing material from us, you can 'opt-out' by emailing us at support@psynomics.com, calling us at 1-858-535-4751, or mailing a letter to:

Psynomics Incorporated
8950 Villa La Jolla Dr. Suite A203
La Jolla, California 92037

If you no longer wish to receive our promotional communications, you may opt-out of receiving them by following the instructions included in our communications or by emailing us at support@psynomics.com, calling us at 1-858-535-4751, or mailing a letter to the address above.

7. PSYNOMICS SECURITY PROCEDURES

The following are some of the security procedures that Psynomics uses to protect your privacy:

- Psynomics requires both a personal username and a password in order for users to access their Personally Identifiable Information, order history and test status (from date orders through date report sent to your health care provider).
- Psynomics uses firewalls to protect information held in our servers.
- Psynomics utilizes Secure Socket Layer (SSL) encryption in transmitting Personally Identifiable Information to our servers. In order to take advantage of encryption technology, you must have an Internet browser which supports 128-bit encryption.
- Psynomics closely monitors the limited number of Psynomics employees who have potential access to your Personally Identifiable Information.
- Psynomics requires all Psynomics employees to abide by our Privacy Policy and be subject to disciplinary action if they violate it.
- Psynomics backs-up our systems to protect the integrity of your Personally Identifiable.
- When you purchase a genetic test through the Psynomics website, a unique Order ID Number is automatically generated and assigned to that test and the corresponding test results and such unique Order ID Number remains the only identifying code associated with your test sample and test results.

- Psynomics has an internal firewall to ensure, except as required for business purposes, that employees who have access to your Personally Identifiable Information (including name, address, and billing information and genetic test results), and vice versa, except as required for business purposes. The only link between these information servers is the unique Order ID Number.

Despite Psynomic's efforts to protect your Personally Identifiable Information and test results, there is always some risk that an unauthorized third party may find a way around our security systems or that transmissions of your information over the Internet will be intercepted.

8. CHANGES TO THIS PRIVACY POLICY

Please note that Psynomics reviews its privacy practices from time to time, and that these practices are subject to change. We ask that you bookmark and periodically review this web page to ensure continuing familiarity with the most current version of our Privacy Policy. To contact Psynomics about privacy issues, to report a violation of our Privacy Policy, or to raise any other issue, please e-mail us at support@psynomics.com.

If we decide to change our privacy practices, we will post those changes to this Privacy Policy, the homepage, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If we make material changes to this Policy, we will notify you here, or by means of a notice on our homepage.

9. DELETING/UPDATING YOUR PERSONALLY IDENTIFIABLE INFORMATION

If you want to delete your Personally Identifiable Information and/or Personal Health Information from our systems or update the Personally Identifiable Information that you have provided to us you can email us at support@psynomics.com. We try to answer every email within 48 business hours, but may not always be able to do so. Another way to update your Personally Identifiable Information is to register as a new user. Keep in mind, however, that there will be residual information that will remain within Psynomics databases, access logs and other records, which may or may not contain such Personally Identifiable Information. The residual information will not be used for commercial purposes; however, Psynomics reserves the right, from time to time, to recontact former customers or users of Psynomics.

If you do not receive adequate resolution of a privacy related problem, you may contact us by mailing a letter to:

Psynomics Incorporated
Attention: Customer Service
8950 Villa La Jolla Dr. Suite A203
La Jolla, California 92037

Or call us at 858-535-4751

10. BUSINESS TRANSFERS

We may sell or transfer assets or portions of our business as we continue to improve our product and service offerings. In the event of such transactions, in order to provide continuity of service, user information (whether Non-Personal Information, Personally, Personally Identifiable Information and/or Personal Health Information) may be transferred.

If you have questions or concerns regarding this statement, you should first contact Allan Youngberg at 1-858-535-4752.