



## Safe Harbor Privacy Statement

### Safe Harbor Standards

This Safe Harbor Privacy Statement (the "Statement") sets forth the privacy principles followed by Genealogy by Genetics, Ltd. (FTDNA) in connection with the transfer and protection of "personal information" received from the European Union (EU) or Switzerland.

### About The Safe Harbor

The "Safe Harbor" program was jointly established in June 2000 by the United States Department of Commerce and the European Commission, as a method for transferring personal information from the European Union (EU), to companies in the United States. Companies that certify represent that they are upholding privacy standards for personal information received from the EU that have been jointly accepted by the EU Commission and the US Department of Commerce. These standards exceed current US privacy standards. FTDNA has certified to the Safe Harbor program and makes that commitment.

"Personal Information" means information that can directly or indirectly lead to the identification of a living person, such as an individual's name, address, e-mail, telephone number, license number, medical identification number, photograph, or other identifying characteristic. The identification can occur by reference to one or more factors specific to the individual's physical, physiological, mental, economic, cultural or social identity. Personal information does not include information that has been anonymized, encoded or otherwise stripped of its identifiers, or information that is publicly available, unless combined with other non-public personal information.

### Scope

This Statement governs personal information transferred from countries in the EU or Switzerland (which has adopted substantially similar privacy laws to those of the EU), to the United States on behalf of FTDNA. It applies to personal information in electronic and off-line formats.

### Safe Harbor Privacy Principles

The following privacy principles apply to the transfer, collection, use or disclosure of personal information from the EU by FTDNA.

**Notice:** FTDNA informs individuals in the EU about the purposes for which it collects and uses their personal information, how to contact FTDNA, the types of third parties with which FTDNA shares their personal information, and the choice and means FTDNA offers for limiting the use and disclosure of their personal information.

Consistent with the Safe Harbor requirements, FTDNA may not be in a position to furnish notice in certain limited situations. Specifically, notice is not required where the processing of EU personal information is necessary to respond to a government inquiry; is required by applicable laws, court orders or government regulations; or is necessary to protect FTDNA's legal interests and providing notice would interfere with those interests.

**Choice:** FTDNA will not process personal information about EU individuals for purposes other than those for which the information was originally obtained or subsequently authorized by the EU individual unless the individual affirmatively and explicitly consents ("opt-in") to the processing, or unless an exception applies. FTDNA also provides EU individuals with the opportunity to withdraw consent at any time ("opt-out"), in which case their personal information will not be further processed.



**Data Integrity:** FTDNA seeks to ensure that any personal information held about EU individuals is accurate, complete, current and otherwise reliable in relation to the purposes for which the information was obtained. FTDNA collects personal information that is adequate, relevant and not excessive for the purposes for which it is to be processed. EU individuals have a responsibility to assist FTDNA in maintaining accurate, complete and current personal information about them.

**Transfers To Third Parties:** FTDNA will only transfer personal information about EU individuals to third-parties where the third-party (a) has provided satisfactory assurances to FTDNA that it will protect the information consistently with this Statement; or (b) is located in the EU or a country considered "adequate" for privacy by the EU Commission, and therefore is required to comply with the EU data protection laws or substantially equivalent privacy laws; or (c) the third-party has also certified to the Safe Harbor, and is accordingly independently responsible for complying with the Safe Harbor requirements.

Where FTDNA has knowledge that a third-party to whom it has provided EU personal information is processing that information in a manner contrary to this Statement or the Safe Harbor requirements, FTDNA will take reasonable steps to prevent or stop the processing.

**Access And Correction:** Upon written request to FTDNA, FTDNA will provide EU individuals with reasonable access to their personal information. FTDNA will also take reasonable steps to allow EU individuals to review their information for the purposes of correcting their information. There are certain limitations to the Access and Correction rights, as set forth in the [US Department of Commerce's Safe Harbor](#) website.

**Security:** FTDNA takes reasonable precautions to protect EU personal information in its possession from loss, misuse, unauthorized access, disclosure, alteration and destruction.

**Enforcement:** FTDNA has established internal mechanisms to verify its ongoing adherence to this Statement. FTDNA also encourages individuals covered by this Statement to raise any concerns about our processing of their personal information by contacting FTDNA's Privacy Office at the address below or by contacting their local privacy officer or Legal Department. FTDNA will seek to resolve any concerns. FTDNA has also agreed to participate in the dispute resolution program provided by the European Data Protection Authorities.

**Limitation On Scope Of Principles:** Adherence to these Privacy Principles may be limited to the extent required to meet a legal, governmental, national security or public interest obligation.

**Contact Information:** Questions or comments about this Statement should be directed to:  
Genealogy by Genetics, Ltd D/B/A Family Tree DNA  
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