



Online Privacy Policy

Below is information about how Adaptive Biotechnologies Corporation collects, uses and discloses personal information.

This Online Privacy Policy (our “Privacy Policy”) sets out how Adaptive Biotechnologies Corporation, our subsidiaries and affiliates (“Adaptive,” “we,” “our” or “us”) collect, use and disclose the personal information collected, as described in the Section 2 below. This Privacy Policy does not apply to any personal information we collect that is subject to the U.S. Health Insurance Portability and Accountability Act and associated regulations (“HIPAA”), which is subject to our [HIPAA Notice of Privacy Practices](#), any personal information that we collect and process on behalf of our clients as processor or services provider (such personal information is subject to the privacy policies of our clients), or other personal information that is out of scope as described in Section 2 below. California residents can find supplemental information about how we might use and disclose their personal information in our [Notice at Collection](#) and in Section 17.B below.

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1. Personal Health Information

Adaptive collects, shares, and processes personal health information. In many cases, this information is collected in our capacity as a regulated entity under. You can obtain more information about how we may process your personal health information and comply with our obligations as a HIPAA-covered entity and the rights you may have under HIPAA at our [Notice of Privacy Practices](#). We may also collect, share, and process personal health information in the context of research (e.g., human subject research, scientific research, etc.). If you are a participant in research sponsored by Adaptive, or otherwise supported by Adaptive, you can find more information about the processing of your personal health information collected for research in the informed consent form provided to you as a research participant.

2. Who does this Privacy Policy apply to?

Except as noted otherwise, this Privacy Policy applies to the personal information that we collect related to:

- Individuals who access or use our websites and online services (together, the “Services”) or whose personal information we otherwise receive in providing the Services;
- Individuals that register for our Services, for example to create a Diagnostics Portal account;
- Our current, former, and prospective clients and business partners;
- Attendees and participants at events or conferences that we host or sponsor;
- Individuals who subscribe to receive news, information, and marketing communications from us; and
- Other individuals that use our Services, communicate or interact with us.

Not Covered by this Privacy Policy. This Privacy Policy does not apply to:

- The samples and associated personal information that we receive from our institutional clients, as a data processor, or any information generated from such samples;
- The samples and associated personal information that we receive from study participants from any clinical or research study of which Adaptive is sponsoring, or any information generated from such samples;
- Samples and information that we receive related to our clonoSEQ testing services or any other information that is subject to HIPAA, such as samples we receive for testing purposes associated with our laboratory services; this information is subject to our [HIPAA Notice of Privacy Practices](#); or
- Job applicants and candidates who apply for employment with us, or to employees and non-employee workers, whose personal information is subject to different privacy notices which are provided to such individuals in the context of their employment or working relationship with Adaptive. You can read more about our privacy practices as an employer in our California [HR Privacy Notices](#).

3. What personal information do we collect about you?

Generally, we collect your personal information on a voluntary basis. However, if you decline to provide certain personal information that is marked mandatory, you may not be able to access certain of the Services and/or we may be unable to fully respond to your inquiry.

Information We Collect Directly. We collect information directly from individuals that use our Services, register for or attend our events, or otherwise communicate or interact with us.

For example, we may collect the following information from you:

- **Registration and account information:** When you register a user account or update your profile information in a service user

account, we collect your name and job title, your employer's name or other affiliation, and other contact information and, when provided, certain health information.

- **Purchases and payment information:** If you make a purchase, we collect your name and job title, your employer's name or other affiliation, contact and shipping information including your email address, credit card or other payment card information, your purchase history (which we sometimes aggregate with similar information from other customers).
- **Communications:** Including any personal information you enter on our websites, such as when completing forms to contact us. Additionally, when you email us, call us, or otherwise send us communications, we collect and maintain a record of your contact details, communications and our responses. Also, if you post or submit reviews and comments to us, we may maintain a record of this content, including the location, date, and time of submission.
- **Marketing, contests, and promotions:** Including your business contact information, such as if you sign up to receive news, updates, offers and other marketing communications from us, we may collect your name, email address and other contact information. We may also collect name, email address, and other information when you participate in promotions, events or activities offered by us (collectively, "events") or submit surveys or feedback to us.

Information Related to Your Usage and Activities Within Our Services. We collect information or derive information about you via automated means (e.g., using cookies and pixel tags) when you use our website or Services or otherwise interact with us and others.

For example:

- **Device and browsing information:** Depending on which of our websites you visit, we and our third-party providers may use cookies, pixels, tags, log-files, and other technologies to collect information about you regarding your browser or device, including:

IP address (and associated location information); MAC address; login credentials; browser type, version, and time zone setting; browser plug-in types and versions; screen resolution; operating system name and version; operating platform; device model; the URL from which you navigated to our website.

- **Activity and usage data:** We also collect information regarding the pages you visited, links you clicked, searches and activities performed on our website, and date and time stamps associated with your activities on our websites. We may also collect other technical information to help us identify your device for fraud prevention, diagnostic and similar purposes. Please see Section 6 for more information about how we may track information related to your interactions with our website.
- **Location information:** We may collect or derive general location information about you, such as through your IP address.
- **Other:** If you contact our customer support services or participate in public events or webinars, we may record these interactions.

Information We Collect from Third Parties. We may collect personal information about you from third parties we work with such as third-party providers of services to us (e.g., fraud detection, identity verification and security), social networks, advertising networks, analytics providers, event sponsors, joint marketing partners, public records, and our affiliated companies.

For example:

- Information from third party platforms related to your posts about us or interactions with us on social media services. For information about how these third-party platforms may use and disclose your information, including any information you make public, please consult their respective privacy policies.
- Information from advertising networks or analytics providers related to your viewing of interactions with our ads, marketing or other content.

- Demographic information, updated professional or contact details and similar lead and prospect information from data brokers, public records, and affiliated companies.

4. For which purposes and on what legal bases do we use and process your personal information?

We may collect, use, disclose, and otherwise process your personal information for the purposes described in this section.

A. Legal Bases for Processing Personal Information (where applicable)

Certain laws, including the General Data Protection Regulation (GDPR), require that we inform you of the legal bases for our processing of your personal information. Pursuant to the GDPR (and other similar relevant laws, such as the UK Data Protection Act), we may process personal information for the following legal bases:

- **Performance of contract:** Processing of your personal information which is required for us to perform obligations or exercise rights under contracts that you may have with us (for example, if you use our Services).
- **Compliance with laws:** To comply with our legal obligations (for example, maintaining information in accordance with tax, audit, or company law requirements and responding to legal process).
- **Our legitimate business interests:** In furtherance of our legitimate business interests including: to facilitate your participation in interactive features you may choose to use on our websites and Services and to personalize your experience with the Services by presenting content tailored to you.
 - to correspond with you, notify you of events or changes to our Services, or otherwise respond to your queries and requests for information, which may include marketing to you.

- to send you advertising material via email, such as surveys and promotions (except where consent is required under applicable laws).
- to provide and personalize the Services.
- for data analysis, audits, fraud monitoring and prevention, and developing new products, enhancing, improving or modifying our websites, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- to protect and defend our legal rights and interests and those of third parties.
- **With your consent:** where applicable laws require that we obtain your consent to collect and process your personal information, we will obtain your consent accordingly. When we obtain your consent, the GDPR (where it applies) and other applicable laws give you the right to withdraw your consent without penalty (e.g., you have agreed to receive marketing emails. By signing up or ticking “yes,” you are agreeing to allow Adaptive to use your data for outreach and marketing purposes. By unsubscribing, you revoke that consent.). You can do this at any time by contacting us using the details at the end of this Privacy Policy. In some jurisdictions (not including where the GDPR applies), your use of the websites may be taken as implied consent to the collection and processing of personal information as outlined in this Privacy Policy.

B. Use and Processing of Personal Information

We collect, use, and otherwise process your personal information for the below commercial or business purposes. While the purposes for which we may process personal information will vary depending upon the circumstances, in general we use personal information for the purposes set forth below. Where GDPR or other similar relevant laws apply, we have set forth the legal bases for such processing (see above for further explanation of our legal bases).

<i>Processing Activity</i>	<i>Legal Basis</i>
Providing support and Services: including to provide our Services; to communicate with you about your access to and use of our Services; to respond to your inquiries; to provide troubleshooting, fulfill your orders and requests, process your payments and provide technical support; and for other customer service and support purposes.	<i>Performance of our contract with you (Art. 6(1)(b) GDPR); and our legitimate interests (Art. 6(1)(f) GDPR)</i>
Analyzing and improving our business: including to better understand how users access and use our Services, to evaluate and improve our Services and business operations, and to develop new Services; to conduct surveys and other evaluations (such as customer satisfaction surveys); and for other research and analytical purposes.	<i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or with your consent (Art. 6(1)(a) GDPR)</i>
Personalizing content and experiences: including to tailor content we may send or display on our websites and other Services; to offer location customization and personalized help and instructions; and to otherwise personalize your experiences.	<i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or with your consent (Art. 6(1)(a) GDPR)</i>
Advertising, marketing, and promotional purposes: on certain websites, including to reach you with more relevant ads and to evaluate, measure, and improve the effectiveness of our ad campaigns; to send you newsletters, offers, or other information we think may interest you; to contact you about our Services or information we think may interest you; and to administer promotions and contests.	<i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or with your consent (Art. 6(1)(a) GDPR)</i>
Planning and managing events: for event planning and management, including registration, attendance, connecting you with other event attendees, and contacting you about relevant events and related services.	<i>Performance of our contract with you (Art. 6(1)(b) GDPR); our legitimate business interests (Art. 6(1)(f) GDPR) and/or with your consent (Art. 6(1)(a) GDPR)</i>

<p>Market research and surveys: to administer surveys and questionnaires</p>	<p><i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or with your consent (Art. 6(1)(a) GDPR)</i></p>
<p>Securing and protecting our business: including to protect and secure our business operations, assets, Services, network, and information and technology resources; to investigate, prevent, detect and take action regarding fraud, unauthorized access, situations involving potential threats to the rights or safety of any person or third party, or other unauthorized activities or misconduct.</p>	<p><i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or compliance with laws (Art. 6(1)(c) GDPR)</i></p>
<p>Defending our legal rights: including to manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend, or protect our rights or interests, including in the context of anticipated or actual litigation with third parties.</p>	<p><i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or compliance with laws (Art. 6(1)(c) GDPR)</i></p>
<p>Auditing, reporting, corporate governance, and internal operations: including relating to financial, tax and accounting audits; audits and assessments of our operations, privacy, security and financial controls, risk, and compliance with legal obligations; our general business, accounting, record-keeping, and legal functions; and related to any actual or contemplated merger, acquisition, asset sale or transfer, financing, bankruptcy, or restructuring of all or part of our business.</p>	<p><i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or compliance with laws (Art. 6(1)(c) GDPR)</i></p>
<p>Complying with legal obligations: including to comply with the law, our legal obligations and legal process, such as warrants, subpoenas, court orders, and regulatory or law enforcement requests.</p>	<p><i>Our legitimate business interests (Art. 6(1)(f) GDPR) and/or compliance with laws (Art. 6(1)(c) GDPR)</i></p>

5. Will we share your personal information with third parties?

We may disclose the personal information we collect as set forth in this section.

- **Vendors and service providers:** To third-party service providers and others who provide us with services such as website hosting, payment processing services, and postal services.
- **Event organizers:** To third parties involved with events that you register for, to facilitate your participation in those events.
- **Business partners:** To our business partners in order to perform services you request or authorize, including as set forth in this policy, in accordance with our commercial practices.
- **Adaptive affiliates and subsidiaries:** We may disclose personal information we collect to our affiliates or subsidiaries, who will use and disclose this personal information in accordance with the principles of this Privacy Policy.
- **Corporate transactions and restructuring:** In connection with planning, due diligence, negotiation and implementation of an actual or potential corporate reorganization, merger, sale, joint venture, transfer, investment transaction, or other disposition of all or any of our business, including in connection with any bankruptcy or similar proceedings.
- **Legal obligations:** As we deem necessary or appropriate under applicable laws, to respond to requests from public and government authorities including public and government authorities outside of your country of residence, to comply with court orders and other legal processes, to legally protect the rights, property, or safety of Adaptive, our users, or others, and to enforce our Website Terms of Use or other agreement with you.
- **To protect us and others:** When we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activity, suspected fraud, situations involving potential threats to the safety

of any person, violations of our Website Terms of Use, or as evidence in litigation in which we are involved.

- **Advertising and analytics partners:** For certain websites, to third parties that provide advertising, campaign measurement, online and mobile analytics, and related services to us (with your consent, where required by applicable laws). They may use this information to help us better reach individuals with relevant ads and to measure and improve our ad campaigns, or to better understand how individuals interact with our Services. In addition, these third parties may combine the information collected from us and our Services with information collected about you from third-party sites, apps and services, in order to make inferences about you and your interests, to better tailor advertising and content to you across multiple sites, apps, and services, and to collect associated metrics.
- **With consent:** To third parties for other purposes, with your consent, or where you have requested us to disclose your personal information.

Aggregate and De-identified Information. Notwithstanding any terms in this Privacy Policy, we may collect, use, disclose and otherwise process aggregated and in certain cases de-identified personal information, data sets and reports in order to assess, improve, and develop our business, products, and Services; prepare benchmarking reports on our industry; and for other research, marketing, and analytics purposes. Where we collect, use, disclose or otherwise process de-identified information, we will maintain and use this information in de-identified form and not attempt to reidentify the information, unless in accordance with applicable privacy laws.

6. How do we use cookies (and other tracking technologies)?

Our websites may use first party and third-party cookies, pixel tags, plugins and other tools, which are used to operate, secure and ensure the proper functionality of the websites and are otherwise necessary to the operation of the website (“necessary cookies”). On some of our websites, we may also use

these tools to gather device, usage, and browsing information in order to personalize and improve your experience while using the websites, to improve and measure our advertising campaigns and to better reach users with relevant advertising both on our websites and on third-party websites, and to protect our Services.

Cookies. A cookie is a small file that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our website, while others are used to enable a faster log-in process or to allow us to track your activities while using our website. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Some of the Services on our websites may not work properly if you disable cookies.

Pixel Tags. Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some websites to, among other things, track the actions of users of the websites (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the websites and response rates. We and our service providers also use pixel tags in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Log Files. Most browsers collect certain information, such as your IP address, device type, screen resolution, operating system version, and internet browser type and version. This information is gathered automatically and stored in log files.

Third-Party Analytics. Our websites use automated devices and applications operated by third parties (e.g., Google Analytics), which use cookies and similar technologies to collect and analyze information about the use of the websites and report on activities and trends.

Managing Your Cookie Preferences. Some of our websites only collect cookies that are necessary for the functionality of the website (we call these "strictly necessary" cookies). For websites where we collect more than the necessary

cookies, you can manage your cookie preferences for our websites and opt out of certain cookies as explained below.

- **Cookie Settings.** On relevant websites, you can review or change your preferences for that website by adjusting your cookie settings through the “Do Not Sell or Share my Personal Info” link in the footer of the website.
- **Browser controls:** In addition, you may block or disable cookies for the device and browser you are using, through your browser settings; however, certain features on our websites may not be available or function properly if you block or disable cookies.
- **Do-not-track signals:** Please note that our websites do not recognize or respond to any signal which your browser might transmit through the so-called “Do Not Track” feature your browser might have. If you wish to disable cookies on our websites, you should not rely on any “Do Not Track” feature your browser might have.

Please note, that your preferences are applied on a browser and device basis. So, you will need to set your cookie preferences for each browser and device you use to access certain of our websites. Further, if you subsequently delete cookies, your preferences may be lost and need to be reset. Our websites that only use necessary cookies do not include a cookie settings manager.

7. How do we use third-party cookies from third-party companies or third-party ad networks?

We may work with third-party ad networks, channel partners, measurement services and others (“third party ad companies”) to help us manage our advertising and marketing campaigns. In doing so, these third parties may collect browsing information, device ID and other online identifiers and location information, through the use of cookies, pixels tags, and other tools (“targeting cookies”) on certain of our websites (as well as across third party websites and online services). These third parties may use this information to provide you more relevant ads and content on behalf of Adaptive and other companies, and to improve and evaluate such ads and content.

In addition, we may share certain hashed customer list information, such as email address, (“**Custom Lists**”) with third parties—such as Facebook, LinkedIn and Google—so that we can better target ads and content to our users and others with similar interests within their services. These third parties use the personal information we provide to help us target ads and to enforce their terms, but we do not permit them to use or share the data we submit with other third-party advertisers.

Your Preferences. On our websites that include targeting cookies, you may review, opt out of or update your preferences for third-party advertising tags and cookies on that website, using our Cookie Settings manager, as noted in Section 6 above. In addition, you can opt out of being included in our Custom Lists by submitting a request through our [Custom List Settings Portal](#).

In addition, you can learn more about the information collection practices and “opt-out” procedures of many third-party ad companies by visiting www.aboutads.info/choices (US), or www.youradchoices.ca/choices/ (Canada), or www.youronlinechoices.com (EU).

8. Will we transfer your personal information internationally?

Adaptive is located in the United States. If you are located outside the United States—such as in the European Economic Area (EEA), the United Kingdom (UK), or Switzerland—and you submit personal information to Adaptive, that information will be transferred to the United States and other jurisdictions in which we or our vendors operate. The data protection laws in these jurisdictions may not be equivalent to those in your jurisdiction of residence. Adaptive will take steps to ensure that your personal information is subject to appropriate safeguards, including, where required, by implementing appropriate adequacy measures, such as the EU standard contractual clauses (as approved by the European Commission) for the transfer of personal data to processors established in third countries. The current form for the standard contractual clauses can be found at <https://ec.europa.eu/info/law/law-topic/data->

[protection/international-dimension-data-protection/standard-contractual-clauses-scc_en](#). For additional information regarding the mechanism under which your personal data is transferred outside of the EEA/UK, you may contact us as set forth below, in Section 16 [Contact Us](#).

9. Which rights do you have with respect to the processing of your personal information?

Subject to applicable law, Adaptive gives individuals several ways to access, amend, and exercise their choices and rights regarding their personal information, as set forth in this section.

Marketing preferences. You may opt out of marketing emails by using the unsubscribe option in each marketing email we send to you. If you opt out of direct marketing communications, we may to the extent permitted by applicable law still send you non-promotional communications, such as those about your account or our ongoing business relationship. In addition, you can opt out of being included in our Custom Lists by submitting a request through our [Custom Lists Portal](#).

Cookie settings. On our websites that include targeting cookies, you may review, opt out of or update your preferences for third-party advertising tags and cookies on that website, using our Cookie Settings manager, as noted in Section 7 above.

Access, amendment and deletion. You may request to review, make amendments, have deleted, or otherwise exercise your rights, under applicable privacy laws, over your personal information that we hold, subject to certain limitations under applicable law. You may submit a request to us related to your personal information by utilizing our Data Subject Request Portal or emailing us at privacy@adaptivebiotech.com. Please note that we may maintain copies of information that you have updated, modified, or deleted, in our business records and in the normal course of our business operations, as permitted or required by applicable law. Your access to or correction of your personal information is subject to applicable legal restrictions and the availability of such information.

Further, we may take reasonable steps to verify your identity before granting such access or making corrections.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality that we owe to others, if we are legally entitled to deal with the request in a different way, or if relevant exemptions apply to some or all of the personal information subject to the request.

Additional information for certain jurisdictions. Adaptive is committed to respecting the privacy rights of individuals under all privacy laws applicable to us. At the end of this Privacy Policy, we provide specific information for individuals in certain jurisdictions, as required under certain privacy laws, including in:

- **EEA/UK:** If you are located in the EEA/UK, please review Section 17 A. GDPR – EEA/UK for information about data subject rights under the GDPR and UK Data Protection Act.

Other US States: If your personal information is subject to a state privacy law (e.g., California, Connecticut, Colorado, Delaware, Iowa, Montana, Tennessee, Texas, Utah, and Virginia), please review Section 17.B – Residents in Other US Jurisdictions. If you are a California resident, you can access supplemental information about your rights under California law at our Notice at Collection.

10. Do we include links to other websites and third-party programs?

Our websites may contain links to enable you to visit other websites of interest easily. We do not have any control over any such other website. Therefore, we cannot be responsible for the protection and privacy of any information you provide while visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

11. What data security measures do we apply to protect your personal information?

We have implemented security measures designed to protect the personal information we collect from unauthorized access or disclosure, including technical and organizational security measures designed to safeguard and secure the personal information we collect. Despite this, data security cannot always be guaranteed. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account

has been compromised), please immediately notify us at privacy@adaptivebiotech.com. In addition, you or anyone on your behalf are specifically requested not to send to us any health information or other sensitive personal information via email or via our external website; for information related to our clonoSEQ services, such information may be submitted in Adaptive's secure Diagnostics Portal.

12. How long do we retain your personal information?

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. For example, we may retain personal information for longer where required by our regulatory obligations, professional indemnity obligations, or where we believe it is necessary to establish, defend or protect our legal rights and interests or those of others.

13. What is the minimum age for individuals whose personal information we process?

Our websites are directed towards adults. We do not knowingly collect or use any personal information from children under the age of sixteen (16) on our websites, and if we become aware that we have collected such information we will take steps to delete it.

14. How can you access our Terms of Service?

If you choose to visit our websites, your visit and any dispute over privacy is subject to this Privacy Policy and our Terms of Service, including limitations on damages, resolution of disputes, and application of the law of the state of Washington, United States of America, which is available at: www.adaptivebiotech.com/terms-of-service/

15. Revisions

This Privacy Policy is current as of the Effective Date above. We may revise this Privacy Policy from time to time. All updates to this statement will be posted

on this web page. If we make material changes that affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our website notifying you at your email address of record with us. Please check our website periodically for the most current version of our Privacy Policy.

16. Contact Us

If you have any questions or concerns related to this Privacy Policy or our information practices, please email us at privacy@adaptivebiotech.com.

You may also contact us via postal mail at:

Adaptive Biotechnologies Corporation
Attn: Adaptive Legal Department
Privacy and Data Protection Officer
1165 Eastlake Avenue East
Seattle, Washington 98109, USA

17. Additional information for individuals in certain jurisdictions

A. GDPR Rights – EEA/UK

To the extent that the GDPR or the UK Data Protection Act applies to Adaptive's processing of your personal information, you may, subject to applicable law, have the following rights in relation to your personal information:

- To obtain from us confirmation as to whether personal information concerning you is being processed, and where that is the case, to request access to the personal information. The accessed information includes – among others – the purposes of the processing, the categories of personal information concerned, and the recipients or categories of recipient to whom the personal information have been or will be disclosed. You have the right to obtain a copy of the personal information undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs;
- To correct any personal information that we hold about you;

- To have your personal information deleted under certain circumstances unless continued processing is necessary by law;
- To have the processing of your personal information restricted where you dispute its accuracy, if you think its processing is unlawful, or if you otherwise object to its processing, or when Adaptive no longer needs your personal information and you need it in relation to a legal claim;
- To receive copies of your personal information we have obtained from you in a structured, commonly used, and machine-readable format and to reuse it elsewhere or to ask us to transfer it to a third party of your choice, under certain circumstances;
- **To object at any time to any processing of your personal information which has our legitimate interests as its legal basis. You may exercise this right without incurring any costs. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. The right to object does not exist, in particular, if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded;**
- To request that we change the manner in which we contact you for direct marketing purposes. You can request that we do not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes;
- To obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside the EU/EEA/UK. We may redact data transfer agreements to protect commercial terms;
- To complain to your national data protection regulator if you feel that any of your personal information is not being processed in accordance with the GDPR or UK law.
- To withdraw your consent, where the processing of your personal information is based on consent (see Section 5 above); if you

withdraw your consent, Adaptive will stop processing your personal information without affecting the lawfulness of our processing prior to the withdrawal of your consent, unless we have another legal basis for doing so.

You may submit a request to us regarding your personal data held by Adaptive through our [Data Subject Request Portal](#).

Please note that we may rely on applicable exemptions under EU, Member State, or UK law in order to deny part or all of your request. If we do so, we will inform you when responding to your request.

EU / UK Representative

Adaptive has representatives established in the EU and UK to comply with EU and UK law. You can contact our EU and UK representatives using the following information:

EU Representative:

DataRep
Cuserstraat 93, Floor 2 and 3
Amsterdam, 1081 CN, Netherlands

UK Representative:

DataRep
107-111 Fleet Street
London, EC4A 2AB, United Kingdom

B. Residents of Certain US States

In this subsection, we provide additional information about how we process personal information for US residents that is not otherwise covered earlier in this Policy, particularly for those residing in a state with data privacy laws and regulations. This includes, but is not limited to California, Connecticut, Colorado, Delaware, Iowa, Montana, Tennessee, Texas, Utah, and Virginia. This subsection does not address or apply to our handling of publicly available information made lawfully available by state or federal governments or other personal information that is subject to an exemption under the applicable data privacy

law. Additional information for residents of California can be found at our Notice at [Collection](#) .

i. What information do we collect about you?

Section 4 of this Policy details at a higher level the types of information that we provide about the categories of information we collect about you, the reasons why we collect and use information about you, as well as the sources of such information. Section 5 of this Policy provides more information about the types of parties to whom we may disclose your personal information. California residents can obtain supplemented information about how we use and disclose their personal information at our [Notice at Collection](#).

The table below sets out, generally, the categories of personal information we collect about US residents and how we may disclose such information to third parties for business or commercial purposes. Our collection, use, disclosure, and other processing of personal information about a US resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident.

Categories and Description of Personal Information Collected		Categories of Third Parties to Whom We May Disclose this Information for a Business or Commercial Purpose
<i>Identifiers</i>	Includes direct identifiers, such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, government identifiers, and other similar identifiers.	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • event organizers • business partners who provide services you request • advertising networks • analytics providers • social networks • internet service providers • operating systems and platforms • others as required by law or directed by you

<p><i>Customer Records</i></p>	<p>Includes paper and electronic customer records containing personal information (such as name, contact information) that individuals provide us in order to obtain our products and services. For example, this may include information collected when an individual registers for an account or enters into an agreement with us related to our services.</p>	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • business partners who provide services you request • others as required by law or directed by you
<p><i>Protected Classifications</i></p>	<p>Includes characteristics of protected classifications under US state or federal laws, such as race, sex, age, and disability, such as disability information and medical conditions (e.g., which we may collect in order to make available appropriate accommodations for events and other activities we host).</p>	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • event organizers • business partners who provide services you request • others as required by law or directed by you

<p><i>Commercial Information</i></p>	<p>Includes records of personal property, products or Services purchased, obtained, or considered, or other purchasing or use histories or tendencies.</p>	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • business partners who provide services you request • others as required by law or directed by you
<p><i>Internet or other electronic network activity information</i></p>	<p>Includes browsing history, clickstream data, search history, and information regarding a resident's interaction with an internet website, application, or advertisement, including access logs and other usage data related to your use of any company websites, applications or other online services.</p>	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • advertising networks • analytics providers • social networks • operating systems and platform providers • others as required by law

		or directed by you
<i>Geolocation Data</i>	Includes precise location information, which may be used to provide certain functions to you on our websites.	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • business partners who provide services you request • others as required by law or directed by you
<i>Professional and employment information</i>	Includes professional or employment-related information (such as current and former employer(s) and position(s), business contact information and professional memberships).	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • others as required by law or directed by you
<i>Education information</i>	Information about an individual's education history.	<ul style="list-style-type: none"> • service providers

		<ul style="list-style-type: none"> • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • others as required by law or directed by you
<i>Audio, video and other electronic data</i>	Includes audio, electronic, visual, thermal, olfactory, or similar information, such as, thermal screenings and CCTV/video footage	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • others as required by law or directed by you
<i>Profiles and Inferences</i>	Includes inferences drawn from personal information to create a profile reflecting a resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • analytics providers

		<ul style="list-style-type: none"> • others as required by law or directed by you
<p><i>Sensitive personal information</i></p>	<p>As an employer and/or prospective employer, assigned work location, contract holder or holder of other employer-like relationship, we may collect certain sensitive information about you. Depending on where you are from, information in the employment context may not be regulated in your state. You can read more about our privacy practices as an employer in our California HR Privacy Notices. We may also process sensitive personal information as HIPAA regulated entity or for scientific research purposes, as described in Section 1.</p>	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • our affiliates and subsidiaries • others as required by law or directed by you

ii. What categories of personal information may be sold or shared with third parties?

Several US privacy laws define a “sale” as disclosing or making available personal information to a third party in exchange for monetary or other valuable consideration and the California Privacy Rights Act (“CPRA”) defines “sharing” broadly to include disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in

exchange for monetary compensation, we may disclose or make available to third-party ad companies (e.g., through third-party cookies and pixel tags on our websites) identifiers and internet and other electronic activity information in order to improve and measure our ad campaigns and reach customers and potential customers with more relevant ads and content. Where this occurs, users can opt out of such third-party tags and cookies, other than those that are “necessary,” by adjusting their cookie settings. For relevant sites, our Cookie Preference Manager will also be accessible through the “Do Not Sell or Share My Personal Info” link in the footer of our website.

iii. What privacy rights apply to you?

Residents of certain U.S. states (as noted above) have additional rights under applicable privacy laws, subject to certain limitations, which may include:

- **Correction.** The right to correct inaccuracies in their personal information, taking into account the nature and purposes of the processing of the personal information.
- **Deletion.** Subject to certain exceptions, US residents may have the right to, at no charge, request deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exemption applies.
- **Access:** To confirm whether we are processing their personal information and to obtain a copy of their personal information in a portable and, to the extent technically feasible, readily usable format.
- **Limit Uses:** To extent sensitive personal information is governed by applicable law, certain US residents may have the right to limit our use or disclosure of sensitive personal information to those authorized by applicable law.
- **Opt Out:** To opt out of certain types of processing, including:
 - to opt out of the “sale” of their personal information.
 - to opt out of targeted advertising by us.

- to opt out of any processing of personal information for purposes of making decisions that produce legal or similarly significant effects.
- **Appeal:** In certain states, such as Virginia, you may appeal our decision by contacting privacy@adaptivebiotech.com.

For residents of **California**, the following additional rights are available to you:

- ***Opt Out of Sales and Sharing:*** California residents have the right to opt out of our sale and sharing of their personal information. We do not sell or share personal information about residents who we know are younger than 16 years old without opt-in consent.
- ***Request to Know/Access:*** California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected about them and to receive information about how we have handled their personal information in the prior 12 months, including the:
 - categories of personal information collected;
 - categories of sources of personal information;
 - business and/or commercial purposes for collecting and selling their personal information;
 - categories of third parties to whom we have disclosed or shared their personal information;
 - categories of personal information that we have disclosed or shared with a third party for a business or commercial purpose; and
 - categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

California residents may make a Request to Know/Access up to twice every 12 months.

- ***Right to Non-discrimination:*** California residents have the right not to be subject to discriminatory treatment for exercising their rights under the CCPA.

We will respond to your request in accordance with and as required by applicable privacy laws.

ii. How can you submit a request related to your personal information?

US residents (or their authorized agents) may submit verifiable requests to Adaptive using the following tools:

- **Online** through our [Data Subject Requests Portal](#);
- By **phone** at (888) 552-8988 (US Toll Free);
- **Email** to the Adaptive Privacy Office at privacy@adaptivebiotech.com;
or
- By **physical mail** to Adaptive Privacy Office c/o Adaptive Legal Department, 1165 Eastlake Avenue E., Seattle, WA 98109.

For users of the Data Subject Request Form, you must provide the information requested at the prompt. This information may change depending on the jurisdiction in which you reside, who you are, and the nature of your request.

Authorized agents may initiate a request on behalf of another individual online using our webform; authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

As noted above, where we collect more than strictly necessary cookies, you may exercise your right to opt out by clicking the “Do Not Sell and Share My Info” link in the footer of relevant websites.

For more information about our privacy practices, you may contact us as set forth in Section 16 Contact Us above.