

ASTRIN BIOSCIENCES, INC.

# Marketing & Communications Consent

*Please read this carefully before creating your account.*

## What is this form?

This form is separate from your HIPAA and medical privacy notice. This consent covers how Astrin Biosciences may contact you for marketing purposes and use certain information about your activity on our website and app to improve our products. You are not required to agree to marketing to use our test. Your medical results and test-related communications are not covered by this form - those are governed by your separate medical and privacy consent.

## Your Consents - Please Review and Check Below

*Each checkbox below links to the full text of that consent on a separate page. Please click each link, read the full text, then return here to check the box. Checking a box confirms you have read and understood the linked terms, and that you are 18 years of age or older.*

### Part 1 - Marketing & Communications Consent [\[Link to Part 1\]](#)

*I agree that Astrin Biosciences may send me marketing emails, push notifications, and direct mail, and may use my activity data to improve products, develop new products, and serve me targeted advertising through platforms like Meta and Google. I understand my data will not be sold to third parties but may be shared with advertising platforms as described in Part 1. This election is voluntary, and declining does not affect your test or medical care.*

### Part 2 - SMS / Text Message Marketing Consent [\[Link to Part 2\]](#)

*I agree to receive recurring marketing text messages (SMS/MMS) from Astrin Biosciences, Inc. at the mobile number I provide. Short code: [\[INSERT SHORT CODE\]](#). Message frequency varies. Message and data rates may apply. Reply STOP to opt out at any time. Reply HELP for help. Consent is not a condition of purchase or test access. A confirmation text will be sent- you must reply YES to complete enrollment. Medical and results texts are sent on a separate number and are unaffected by this election.*

Phone number for marketing texts:

### Part 3 - Washington Residents Only: Washington State Health Data Authorization [\[Link to Part 3\]](#)

*Required for Washington State residents under the My Health MY Data Act (MHMDA). I authorize Astrin Biosciences to collect, use, and share my consumer health data (including the fact of purchasing a cancer screening test and related activity data) for the marketing purposes described in Part 3. Washington residents must complete this in addition to Part 1.*

**Part 4 – California Residents Only: CCPA/CPRA Disclosures [Link to Part 4]**

*Required for California residents under the California Consumer Privacy Act (CCPA/CPRA) disclosures in Part 4, including my rights to know, delete, correct, and opt out of the sale or sharing of my personal information and sensitive personal information.*

**FULL CONSENT TEXT - Parts 1 through 4 follow below. Each Part is also accessible via its individual link above.**

## **PART 1 - Marketing & Communications Consent | All Users**

### **1. Who We Are**

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Astrin Biosciences, Inc. makes at-home blood tests for early cancer screening. We work with licensed physicians to review and approve your test and results. When this consent says "we," "us," or "Astrin," it means Astrin Biosciences, Inc.

### **2. What This Consent Covers**

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This consent covers the following activities ONLY. It does not cover your medical care, your test results, or any communications required by law or by your physician.

- a. Marketing and promotional messages about Astrin products and services
- b. Emails, text messages (SMS), push notifications, and direct mail we send you for marketing purposes
- c. Use of information about how you use our website and app to improve our products and develop new ones
- d. Sharing of certain activity data with advertising platforms (like Meta and Google) so we can show relevant ads to people like you
- e. Internal analysis to understand how our products are used

### **3. What We Will Never Do**

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We want to be clear about what this consent does NOT allow:

- We will not sell your personal information or health data to any third party.
- We will not share your health data with advertisers or data brokers for their own use.
- We will not send you marketing texts on the same channel as your medical results. Those are separate.
- We will not use your data for marketing in a way that violates HIPAA, applicable state law, or your medical privacy consent.

## 4. How We Use Your Information for Marketing

When you use our website, app, or purchase a test, we collect certain information about your activity - like what pages you visit, what you click on, and what you buy. Here is how we use that:

How We Use It	What It Means for You
<b>Send you marketing emails</b>	News about our products, promotions, and health tips.
<b>Send you marketing texts (SMS)</b>	Promotional messages. These are separate from your medical result texts. You must opt in separately below.
<b>Send push notifications</b>	Reminders and promotional alerts via our app, if you have it installed.
<b>Send direct mail</b>	Occasional physical mail about our products.
<b>Improve our products</b>	We analyze how people use our test and website to make improvements and build new products, for the benefit of you and other customers. This may involve aggregated and de-identified data, as well as identifiable activity data linked to your account.
<b>Advertising on third-party platforms</b>	We use a HIPAA compliant third-party service to route certain activity data (like page visits and purchases) to advertising platforms like Meta (Facebook/Instagram) and Google. This helps us reach people who may be interested in our products. Your click ID (a code that connects an ad you clicked to your account) may be included in this data. See Section 5 for more details.
<b>Develop new products</b>	Data about how you use our test may inform new products we build, for the benefit of you and other customers. You will not receive payment or other remuneration for this use.

## 5. Third-Party Advertising Platforms & Tracking Technology

We want to be transparent about how our advertising technology works, because it involves your data.

When you visit our website or app, small pieces of code called "tracking scripts" or "pixels" may collect information about what you do - for example, which pages you visited or that you purchased a test. This information is sent to a HIPAA compliant third-party vendor who forwards certain data to advertising platforms like Meta (Facebook/Instagram) and Google based on how we have configured the system.

Important things to know:

- The vendor is contractually required to handle your data securely, although no system or process is 100% free of risk of a breach.
- We control what data is sent to sites like Meta and Google. Your advertising click ID (a code like "fbclid" from a Facebook ad or "gclid" from a Google ad) may be included in data forwarded to those platforms. This is how advertisers confirm that an ad led to a purchase.
- The data sent to sites like Meta and Google is used to measure ad performance, find similar potential customers, and optimize our advertising. These platforms have their own privacy policies that govern what they do with this data once they receive it.
- This data flow occurs both before and after you log in to your account.

By agreeing to this consent, you are specifically agreeing to this data flow, including the possibility that the fact of your purchasing a cancer screening test may be associated with your advertising profile on platforms like Meta or Google.

#### **Your right to opt out of advertising tracking**

You may opt out of this specific use at any time by contacting us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com) or by adjusting your account settings. Opting out of advertising tracking will not affect your ability to use our test or receive your results.

## **6. No Payment for Your Data**

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We may use information about your use of our products to develop and improve our tests and to build new products. You will not receive any payment, credit, or other remuneration for this use. If you do not wish your data to be used in this way, you may request deletion of your data by contacting us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com).

## **7. How Long We Keep Your Information**

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We keep your marketing data for as long as your account is active or as needed to provide services to you, comply with legal obligations, resolve disputes, and enforce our agreements. You may request deletion at any time (see Section 9).

## **8. No Minors**

Our products and services are intended for adults 18 years of age and older. We do not knowingly collect personal information from anyone under 18. If you believe a minor has provided us with personal information, please contact us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com).

## 9. Your Rights & How to Contact Us

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You have the right to:

- Withdraw this marketing consent at any time without affecting your medical care or test access
- Opt out of marketing emails at any time using the unsubscribe link in any email
- Opt out of marketing texts at any time by replying STOP to any marketing text
- Request a copy of the personal information we hold about you
- Request deletion of your personal information (subject to legal retention requirements)
- Request correction of inaccurate personal information
- Opt out of the sale of your personal data. We do not sell personal information. However, if any data-sharing arrangement with advertising platforms is ever determined to constitute a sale under applicable state law (including Oregon's OCPA or Texas's TDPSA), you have the right to opt out at any time by contacting us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com) or adjusting your account settings.
- Opt out of targeted advertising. You may direct us to stop using your personal information to serve you targeted ads based on your activity, regardless of which U.S. state you live in. Contact us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com) or [adjust your account settings](#).

To exercise any of these rights, contact us at:

Astrin Biosciences, Inc. - Privacy Office  
1000 Westgate Dr., Suite 1009, St. Paul, MN 55114  
Email: [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com)  
Website: [\[LINK TO PRIVACY POLICY\]](#)

## 10. Changes to This Consent

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We may update this consent from time to time. [We will make reasonable efforts to notify you of material changes- such as changes to the types of data we collect, the third parties we share data with, or the purposes for which we use your data- before they take effect](#). Continued use of our services after that communication means you accept the updated consent. You may always withdraw consent at the contact information above.

## PART 2 - Text Message (SMS) Marketing Consent | All Users

You do not have to sign up for marketing texts to use our service or receive your results. Your medical and results texts are sent separately and are not covered by this part. Consent to marketing texts is not required to use the Astrin test or receive your results.

### How Our Text Messages Work

If you agree below, Astrin Biosciences may send you marketing text messages to the mobile phone number you provide. These texts may include:

- News about our cancer screening products
- Promotions, offers, and discounts
- Information about new Astrin products and services
- Reminders to reorder or retest

Message frequency will vary. Standard message and data rates may apply.

<b>To opt out:</b>	Reply STOP to any marketing text at any time.
<b>For help:</b>	Reply HELP or contact <a href="mailto:certitude.inquiries@astrinbio.com">certitude.inquiries@astrinbio.com</a> .
<b>Sender:</b>	Astrin Biosciences, Inc. - Short Code: [INSERT SHORT CODE]
<b>Medical texts:</b>	Results, physician messages, and test updates are sent on a separate number and are not affected by opting out of marketing texts.

#### Double opt-in confirmation

After checking this box and creating your account, you will receive a one-time confirmation text to the number you provided. You must reply YES to that text to complete your SMS enrollment. You will not receive marketing texts until you confirm.

## PART 3 - Washington State Residents Only | My Health MY Data Act (MHMDA)

#### This section applies to you if you are a Washington State resident.

Washington's My Health MY Data Act gives you additional rights over your health data. This part provides additional required disclosures and a separate authorization.

## What Is "Consumer Health Data" Under Washington Law?

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Washington's My Health MY Data Act (MHMDA) defines "consumer health data" broadly. In our case, this may include:

- The fact that you purchased or used a cancer screening test
- Website or app activity that could reveal a health condition or concern
- Data about your body or health derived from your use of our services

Washington law requires us to get your separate, specific consent before we collect, use, or share this type of data for purposes beyond your direct medical care.

## How We Use Your Consumer Health Data for Marketing

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In addition to the uses described in Part 1, we want to be specifically clear for Washington residents that:

- The fact that you purchased a cancer screening test is "consumer health data" under Washington law.
- When we share activity data with advertising platforms like Meta and Google (described in Section 5 of Part 1), this may include data that qualifies as consumer health data under Washington law.
- We use this data to serve you relevant ads, measure advertising performance, and identify similar potential customers.
- You can withdraw this authorization at any time by contacting us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com). Withdrawal will not affect your access to medical care or test results.

## Your Additional Rights as a Washington Resident

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Under the MHMDA, you have the right to:

- Confirm whether we hold consumer health data about you
- Access a copy of your consumer health data
- Withdraw consent for collection or sharing of your consumer health data
- Have your consumer health data deleted (subject to legal exceptions)
- Appeal our decisions about your rights requests

To exercise these rights, email us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com) with "Washington Health Data Request" in the subject line. We will respond within 45 days as required by law.

You also have the right to bring a private legal action under Washington law if we violate the MHMDA. This is a right that other states do not currently provide.

## PART 4 - California Residents | CCPA/CPRA Disclosures | All Users

### About This Section

Part 4 applies to all users. California residents are required to acknowledge these disclosures. Users in all other states may check this box voluntarily.

## California Consumer Privacy Act (CCPA/CPRA) Disclosures

This section applies if you are a California resident and Astrin Biosciences is subject to the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA).

## Categories of Personal Information We Collect

We collect the following categories of personal information for the marketing purposes described in this consent:

- Identifiers: name, email address, phone number, IP address, device identifiers
- Commercial information: products purchased, purchase history, purchasing preferences
- Internet or other electronic network activity: browsing history on our site, search history on our site, interaction with our website or app
- Health and medical information: the fact of purchasing a cancer screening test (sensitive personal information under CPRA)
- Inferences: profiles about your preferences or characteristics derived from the above

## Your California Rights

As a California resident, you have the right to:

- Know what personal information we collect, use, disclose, and sell
- Delete personal information we have collected
- Correct inaccurate personal information
- Opt out of the sale or sharing of your personal information (Note: we do not sell personal information, but our use of advertising pixels may constitute "sharing" under CPRA)
- Limit use and disclosure of sensitive personal information (including health data) to necessary purposes
- Non-discrimination for exercising your privacy rights

To exercise these rights, submit a verifiable consumer request to [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com) or call [TOLL-FREE NUMBER].

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## Sensitive Personal Information

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The fact that you have purchased a cancer screening test may constitute sensitive personal information under CPRA. We use this data for the marketing and advertising purposes described in Part 1 of this consent. You have the right to direct us to limit our use of your sensitive personal information to that which is necessary to perform the services you requested.

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## "Do Not Sell or Share" / Opt-Out of Targeted Advertising

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We do not sell personal information. However, our sharing of certain activity data with advertising platforms like Meta and Google may constitute "sharing" personal information under CPRA for cross-context behavioral advertising purposes. You have the right to opt out of this sharing at any time by:

- Contacting us at [certitude.inquiries@astrinbio.com](mailto:certitude.inquiries@astrinbio.com)
- Adjusting your account settings
- Using a browser or device opt-out signal (such as Global Privacy Control)

### **Notice: Medical & Test-Related Communications**

This consent does not govern - and your agreement or disagreement with it does not affect - any of the following communications:

- Delivery of your cancer screening test results
- Communications from or on behalf of your reviewing physician (Open Loop)
- Notifications required by law (such as data breach notices)
- Service communications about your account, order, or test kit
- Safety-related communications

These communications are authorized under your separate HIPAA and medical privacy consent and are sent regardless of your marketing preferences. They do not require additional consent under this document.