

The Broad Institute, Inc.

gnomAD

Privacy Policy

Last Updated: DRAFT as of August 5th, 2022

The Broad Institute, Inc. (“**Broad**,” “**we**,” “**us**,” or “**our**”) values your privacy. This Privacy Policy (“**Policy**”) provides important information about how Broad collects and uses your Personal Information when you access or use the gnomAD Browser (“**Browser**”) at <https://gnomad.broadinstitute.org>. Any access to or use of the Browser is governed by the Browser Terms of Use, which are incorporated into and made part of this Policy. The Terms of Use are located here: <https://gnomad.broadinstitute.org/policies>. By accessing or using the Browser, you consent to our collection, use, and disclosure of your information in accordance with this Policy and Terms of Use. If you do not agree to our Policy or Terms of Use, you may not use the Browser.

This Privacy Policy also describes how Broad collects, uses, and discloses personal information of users.

Information We Collect

We collect information (including Personal Information) about you in two ways. The first is information you voluntarily provide to us when you choose to do any of the following, none of which is required:

- Communicate with us (e.g., by email), or
- Respond to surveys we may make available to you through avenues such as our Browser or other public venues.

The second way we collect information is through certain automated technologies that are used when you access our Browser. An example is a “cookie,” which is a small piece of computer code that is placed on your computer or other device that can be used for various purposes, such as to recognize a user or to track their activities on a website. We describe automated technologies in more detail below. We collect various information through these automated technologies, including your Device Information as described below, along with how you use our Browser, such as the web pages you view, the links you click, the length of time you visit our Browser, and the web page or web site that led you to our Browser. This information is useful in many ways including to help us document use of our website for obtaining funding as well as to learn how users are interacting with our website to improve its function.

What kind of information might we collect?

We may collect various types of information:

- “**Personal Information**” is information that alone or in combination with other information may be used to readily identify, contact, or locate you. For example, your name and email address are Personal Information we may collect through your voluntary communications with us.

- **“Device Information”** is information that relates to a particular computer, mobile device, or other device (e.g., iPad) that you use to access the Browser. Device Information includes such things as an IP address (which is a number assigned by an internet service provider to the computer you use to access the Internet), a device ID (which is a number assigned to a mobile phone by the device manufacturer), or the type of operating system or web browser used to access the Platform.
- **Other information you choose to provide**, such as when you participate in a survey or when you request technical or customer support.

Do we use cookies and other tracking technologies?

Yes. We use cookies for various purposes, such as to allow us to track your activities on our Platform. There are two types of cookies: session and persistent cookies.

- **Session Cookies**. Session Cookies exist only during a session. They disappear from your computer or device when you close your browser or turn off your computer or device. We do not currently use any session cookies.
- **Persistent Cookies**. Persistent Cookies remain on your computer or device after you have closed your browser or turned off your computer or mobile device. We use Persistent Cookies to track aggregate and statistical information about user activity on our Browser (see **“Tracking Technologies”** below).

Disabling Cookies. 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. Visitors to our Browser who disable cookies may not be able to use the Browser.

Tracking Technologies. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Browser. We also may use other analytic means to evaluate our Browser. We use these tools to help us improve our Browser, performance, and user experiences.

Do you respond to Do Not Track signals?

Do Not Track (“DNT”) is a privacy preference that users can set in their web browsers. When users turn on DNT, their browser sends a message to websites requesting that they do not track the user. However, our Browser does not change its information collection in response to DNT browser settings or signals while we await better standards for how websites should change practices in response to DNT. For information about DNT, visit www.allaboutdnt.org.

How do we use your information?

We use your information, including your Personal Information, to improve and develop our Browser. We use your information to ensure our Browser is working as intended, to better understand how users access and use our Browser, both on an aggregated and individualized basis, to make improvements to our Browser, to develop new features and applications, and for other research and analytical purposes.

With whom do we share your information?

We may need to share your information, including your Personal Information, with third parties. The following are the categories of third parties with whom we may share your Personal Information:

- **Vendors and Service Providers.** We use various third-party vendors and service providers that assist us in providing the Platform. For example, when we send email communications. We may share your information with these vendors and service providers to enable them to provide these services to us. These service providers and vendors are required to only use your information to provide their services to us and in a manner consistent with this Policy.
- **As Required By Law.** We may be required, by law, to disclose your Personal Information to third parties, such as in the following situations:
 - In response to a request by law enforcement;
 - In response to legal process, such as a subpoena, a request for discovery in a civil proceeding, or in response to a court order.
- **Enforce Our Terms and Protect You, Us, and Others.** We may access, preserve, and disclose your Personal Information to enforce the Terms of Use for the Browser and protect your, our, or others' rights, property, or safety.
- **Merger, Sale, or Other Corporate Transactions.** A legal entity, such as Broad, may be involved in a business transaction where its ownership or assets are sold or transferred to another legal entity. This can happen in a merger with another legal entity, an acquisition by another legal entity, a corporate reorganization, or a legal proceeding (*e.g.*, bankruptcy or receivership) where a trustee or other takes over control of the entity. In each of these situations, your information, including your Personal Information, may be sold or transferred as part of such a transaction as permitted by law and/or contract.
- **With Your Consent.** We may ask you from time to time to give us permission to share your information with other third parties not described in this section. In each case, we will describe that third party and the purpose for sharing your information.
- **Aggregate and De-Identified Information.** We may share aggregate or de-identified information about users and their use of the Browser with third parties and publicly for marketing, advertising, research, or similar purposes such as obtaining funding from third parties to support gnomAD, or to encourage use of the browser. This information will not identify you personally.

What rights do I have with respect to my information?

We will respond to any user request as soon as we reasonably can, and within the time and in the manner required by law. We may request additional information from you to verify the request. We may not be able to accommodate all requests; for example, we may be unable to accommodate a modification or deletion request if we are required to maintain information under law or a legal obligation.

What kind of security does the Browser use to protect my information?

We seek to use reasonable physical, technical, and administrative measures designed to protect personal information within our organization. Unfortunately, no data transmission, processing, or storage system can be guaranteed to be 100% secure. If you have reason to believe that your use of the Browser is no longer secure, please immediately notify us in accordance with the “Contacting Us” section below.

Links to Third-Party Websites

Our Browser may reference or provide links to third-party websites. Other websites may also reference or link to our Browser. Because these websites are not controlled by Broad, we are not responsible for the third-party websites. We encourage our users to be aware when they leave our Browser to review the privacy policies posted on each and every website that collects personally identifiable information. Please be aware that Broad does not control, endorse, screen or approve, nor are we responsible for, the privacy policies or information practices of third parties or their websites or mobile applications. Visiting these other websites is at your own risk.

Whom do I contact if I have a question or a complaint?

You may contact us at the addresses below if you have any questions or complaints about information practices or this Policy:

By email to: gnomad@broadinstitute.org

Will you update or change this Policy?

Yes, we may need to update or change this Policy for various reasons, such as to comply with changes in the law or to cover new features provided through the Browser. If we update or change this Policy we will post the changes to the Policy on the Browser.

To make sure you are aware of any updates or changes, you should review this Policy periodically. We will post the effective date of any new policy.