

MyHeritage Privacy Policy

This Privacy Policy was last updated on September 8, 2020.
If you have not reviewed it since that date, please do so now.

PRIVACY POLICY SUMMARY

Who Are We?

MyHeritage is a direct-to-consumer company headquartered in Israel. MyHeritage develops services for family history research, DNA testing, and genetic health testing.

Our Key Privacy Principles

MyHeritage was founded in 2003 and has enjoyed the trust of its users for 17 years. MyHeritage cares deeply about the privacy of its users and the privacy of their data and its top priority is to honor their trust.

MyHeritage has never sold or licensed personal data (like customer names, email addresses, residence addresses and family trees) and will never do so in the future. MyHeritage has never sold or licensed genetic data or health data, and will never do so in the future without a customer's explicit informed consent. MyHeritage will never provide data to insurance companies under any circumstances. MyHeritage prohibits law enforcement use of its DNA Services.

Users can delete their data from MyHeritage at any time. Deletion is permanent and irreversible.

If anything material ever changes in this privacy policy, we will notify you by email.

What Information Do We Collect About You?

We collect information we believe is necessary for our legitimate business interests, to provide you with our Service (as defined in our [Terms and Conditions](#)), as described below:

Information you share directly with us. For example, information that you enter when you sign up for the Service, create a family tree or do your family history research using the Service, communicate with our customer support staff, fill in a questionnaire or survey on our Website, and so on.

Information from Public and Historical Records. We digitize such records ourselves or license them from archives and other sources, to create content needed by genealogists. These records may include public information about you.

Information from our DNA Services. If you purchase our DNA test or upload your DNA data to our Website, we extract your DNA from your DNA sample or use your uploaded DNA Results, process them and conduct genetic analysis in order to provide you with our DNA Services.

Information we receive when you use our Service. We collect web-behavior information using automated means of data collection technologies (like cookies) to enhance your experience of

visiting the Website and understand how our Services are being used. See our [Cookie Policy](#) for more information.

How Do We Use Your Personal Information?

To provide our Service to you. This includes displaying your family tree, comparing your family tree to other family trees to serve you Smart Matches™, comparing your family tree to historical records to serve you Record Matches, comparing your DNA data to other users to serve you DNA Matches, providing you with DNA Reports, and so on.

To communicate with you about the Service.

To market the Service to you, from which you can opt-out at any time.

For internal business purposes, to improve and develop new products and services, perform internal data analysis, analyze the use of the Website to improve the customer experience or assess our promotional campaigns.

For internal or external research, with your consent. If you voluntarily choose to participate in our research and agree to our DNA Informed Consent Agreement.

Will MyHeritage Disclose any of Your Personal Information to Third Parties?

Personal information provided by you is never sold or licensed. We will never sell or license DNA information or health information to any third parties without your explicit informed consent. We will never sell or license any information to insurance companies under any circumstances.

We will not provide information to law enforcement unless required by a valid court order or subpoena for genetic information.

We will not disclose any of your personal information to any third party except in the following very limited circumstances:

(a) with our service providers (e.g. payment platforms Adyen, Stripe, BlueSnap and PayPal) under the protection of appropriate agreements - to provide you with our Service; (b) with your DNA Matches (if enabled); (c) with your Smart Matches (if enabled); (d) when required of us by law or to protect our rights or property of other users; (e) to enforce our Terms and Conditions or Privacy Policy; and (f) In the scope of an acquisition of our business.

Security of Your Personal Information

We have implemented technical, physical and administrative security measures to protect against the loss, misuse, unauthorized access, alteration or disclosure of users' personal information under our control. For example: we periodically review and enhance our security and privacy practices as necessary, we commission periodic penetration tests to test the robustness of the security of our Service, only authorized personnel have access to personal information, and we only work with labs and third parties who meet and commit to our security standards.

Managing Your Privacy

We give you the ability to share information in a variety of ways. You can choose when and with whom you share your information outside of the Service. You can disable DNA Matching or Smart Matching™, opt out of viewing results for certain incurable conditions within the DNA Health Reports, give or decline consent for research, manage cookies using your browser controls, request to destroy your DNA sample/s, and delete your account and data, at any time.

FULL PRIVACY POLICY

In this document (the "**Privacy Policy**") we provide information on what personal information is collected and why, as well as how we use the personal information to provide you with a personalized, user-friendly experience on the Website. We also explain how you can view this personal information, control the way it is shared, or delete it.

By using this Website and the Service you are accepting the practices described in this Privacy Policy and the processing (including collecting, using, disclosing, retaining or disposing) of your information under the terms of this Privacy Policy. This Privacy Policy should be read in conjunction with the **[Terms and Conditions](#)**. Capitalized terms used and not defined here, have the meanings ascribed to them in the Terms and Conditions.

CHANGES TO THIS PRIVACY POLICY

If we decide to modify our Privacy Policy, we will issue an updated version of this Privacy Policy with an updated date legend and if the changes are material, we will also notify you via email. If you do not consent to the Privacy Policy or to any changes in it and as a result you would like us to cease using or storing your information in accordance with the revised policy, then delete your account or contact us at **privacy@myheritage.com** and ask us to do it for you.

Whenever this Privacy Policy is modified in substance, the label "**updated**" will be displayed prominently next to the "Privacy Policy" link in the footer of the Website pages. The "updated" label will be removed after 30 days or when you visit the updated Privacy Policy to read it, whichever comes sooner. Use of the Website or the Service following any changes constitutes your acceptance of the revised Privacy Policy then in effect. **If you do not agree to this Privacy Policy, please do not use the Website or the Service and delete your account.**

WHAT PERSONAL INFORMATION IS COLLECTED FROM YOU OR ABOUT YOU?

We only collect information we believe is necessary for our legitimate business interests, to provide you with the Service. The amount of other personal information you decide to submit to MyHeritage is up to you.

Here are the types of personal information we request, collect or you provide:

1) Name, Contact Information and Payment Details: When you sign up for the Service, we ask for your name, gender and email address, as well as birth year and country. The birth year is collected to ensure that you comply with the **[Terms and Conditions](#)** with regards to underage and minor users. If you purchase a subscription or another product, we will need to know your postal address, phone number and payment details to facilitate payment and fulfillment.

2) Information on Your Family and Others: You may also enter additional personal information about yourself and others in the course of building your family tree or doing your family research on the Website, e.g., names, relationships, dates and places of birth and death, contact information such as email address, and photos.

If you choose to invite a family member or another person to view or edit your family tree, we will ask you for the individual's email address and name. You must first make certain that you have obtained their consent to pass on their details to MyHeritage, before you invite them.

When building a family tree, you decide which relatives to add to the family tree, whether to add deceased relatives, living relatives or both, and which information to include about them. Adding living relatives to the family tree requires you to obtain their prior consent. Before adding living relatives below legal age to the family tree, you must obtain the consent of their parent or guardian.

3) Information from Public and Historical Records: We digitize, license and procure records from various sources, including birth, marriage and death certificates, census records, immigration lists, newspapers and other records. Such records may contain personal information relating to you.

4) DNA Information: DNA-related information is generated and stored when you use our DNA Services, i.e., when you purchase our DNA test kit, or upload your DNA data that was generated by another DNA testing service. Our DNA Services will extract your DNA from your DNA sample or use your uploaded DNA Results, process them and conduct genetic analysis in order to provide you with our DNA Reports.

5) Your Comments and Opinions: If you post messages or comments on our blogs or Facebook accounts, or our message boards, we may capture that information.

6) Your Use of the Service: While you use our Service, we may collect information based on your interaction with our Website or from the devices or computers you use to access the Website, to enhance your experience of visiting the Website and understand how our Services are being used. This may include web log information, "clickstream" data (for example, the type of computer and browser you use, the address of the web site from which you linked to the Website), page views and IP addresses.

7) Your Communications: Your communications with other users through the Service's features (e.g. MyHeritage Inbox), as well as information you provide us in communications with our customer support team (e.g. support tickets) or other representatives, will be collected by us.

8) Your Survey Answers: If you voluntarily participate in any Surveys or questionnaires on the Service, we will collect the information you provide.

9) Your Health Questionnaire Information: Before providing you with the DNA Health Reports, we collect certain self-reported family health history information from you, about you and your family members using a questionnaire (the "Health Questionnaire Information" and the "Health Questionnaire", respectively). In the USA, we are obligated to collect this information to comply with health regulations. Outside the USA, we are not obligated but we collect it for data consistency.

10) Third Party Account Authentication Services: You may link an account from Facebook or Google to your account on our Service, for authentication. This will allow you to use your credentials from the other service to create a MyHeritage account or to sign in to MyHeritage, without having to enter details manually such as your email address. If you choose to do so, we will collect and use the information you authorized to share with us via that service, (for example, the email address for a connected Facebook or Google account), in accordance with this Privacy Policy.

11) Information from Integration with Genealogy Partners: Our genealogy partners such as Roots Magic and Family Historian (the "**Genealogy Partners**") may pass genealogical information from family trees of their users to us via an integration for matching with our family trees and records. We do not receive a license to this information sent by Genealogy Partners, it is not collected by us, and it is deleted automatically after matches are calculated.

HOW DO WE USE YOUR PERSONAL INFORMATION?

1) *To provide the Service to You:* We primarily use your personal information to fulfill the purposes for which you provided the personal information to us. These include displaying your family tree, re-running family history searches made to find more records for you, processing your subscription and providing you with customer support. We also use your personal information to serve you Smart Matches™ and Record Matches for your family tree, or to enable you and other members of the MyHeritage community to contact each other, and so on.

If you are using our DNA Services: We will process and store your DNA samples, conduct genetic analysis and provide you with the DNA Results and DNA Reports. If DNA Matching is enabled, we will compare your DNA data to other users to serve you DNA Matches. If you are interested in the DNA Health Reports, the Health Questionnaire Information will allow us to determine your eligibility to receive them. For U.S. customers, the DNA Health Reports are provided pursuant to a physician's order. We may add new DNA Health Reports for you as they become available.

2) *To communicate with you:* We may communicate with you for the purpose of informing you of updates or additions to the Service, or to seek feedback from you about the Service. Our communications with you will be conducted primarily via email, but may also be made via telephone, direct mail or another method of communication in some circumstances. If you do not want to continue to receive emails from us, you may opt out at any time by using the unsubscribe link listed in the email or by setting your Email Preferences. If you wish to opt out of other methods of communication, please contact us at privacy@myheritage.com.

3) *To market our services:* By signing up to the Service, you agree that we may use your contact information as well as information about your use of the Service, to offer you complementary MyHeritage products or services. Such promotional offers may be made via email, telephone or direct mail. We will never send you promotional offers by Text Message (SMS); The only Text Messages (SMS) you may receive from us are messages about upcoming birthdays and wedding anniversaries of close family members in your family if you opted-in to that specific feature.

If you do not want to receive marketing offers via emails, you may opt out at any time by using the unsubscribe link listed in the email or by setting your Email and Communication Preferences. See the section on Email Preferences below. If you do not want to receive marketing offers via telephone, you can also do that via the Email and Communication Preferences. You can also instruct us to stop communicating with you by contacting us at privacy@myheritage.com or request this whenever you are speaking with any representative of MyHeritage.

The aggregated information gathered from you and other users through the Surveys may be used in our marketing, and such emails or promotional offers may be presented to you.

4) *For internal business purposes:* In order to improve the Service and to develop new products and services, we may use your personal information for internal data analysis, for studying how the Website is used, to help us diagnose problems and secure the Service, identifying usage trends and determining the effectiveness of promotional campaigns. For example, we may examine how much time visitors spend on each page of the Website and how they navigate through the Website. We will only use this information to improve the Website.

We use your IP address to deliver the Website and our Service to you and to help diagnose problems with our servers. Your IP address is also used to gather broad demographic information such as geographic distribution of our members. When you visit the Service for the

first time, we use your IP address to suggest the Service to you in the language deemed most appropriate for the geographical region from which it originates.

5) *To perform research:* If you voluntarily agreed to the DNA Informed Consent Agreement, we may use your information (such as Survey Research information, DNA Results and other DNA information) for the purposes of research as specified in the Informed Consent. Your Informed Consent may be revoked at any time through the Website. Your identity and the identity of your family members will never be disclosed by us in any publication of any research results.

LEGAL GROUNDS FOR THE PROCESSING OF PERSONAL INFORMATION

Under EU data protection law, ("GDPR"), and Brazil's data protection law, the Lei Geral de Proteção de Dados ("LGPD"), all processing of personal information is justified by a "condition" for processing. In the majority of cases, any processing will be justified on the basis that:

- you have consented to the processing
- the processing is necessary to perform a contract with you (e.g. processing your payments or creating your user account)
- the processing is necessary to comply with a relevant legal obligation; or
- the processing is in our legitimate commercial interests, subject to your interests and fundamental rights

In addition, the processing of "special category data" or "sensitive personal data" is only permitted where a relevant exemption exists. Special category data includes genetic information, which we process as part of the DNA Services, any information about your ethnic origin or the Health Questionnaire Information. In these cases, the special category data or sensitive personal data is processed on the basis of your explicit consent. Where the basis of processing is your consent, you have the right to withdraw your consent, and therefore prevent that processing, at any time.

WILL MYHERITAGE DISCLOSE ANY OF YOUR PERSONAL INFORMATION TO THIRD PARTIES?

Personal information provided by you is never sold or licensed. We will never sell or license DNA information or health information to any third parties without your explicit informed consent. We will never sell or license DNA information or health information belonging to users from Russia, Norway or Sweden under any circumstances (even if they provide explicit informed consent). We will never sell or license any information to insurance companies under any circumstances. These protections cover everything related to DNA, including DNA samples, DNA Results, DNA Reports, DNA Health Reports, and so on.

We will not provide information to law enforcement unless required by a valid court order or subpoena for genetic information.

MyHeritage will not disclose any of your personal information to any third party except in the limited circumstances listed below:

1) *In an acquisition of MyHeritage:* in the event that MyHeritage, or substantially all of its assets or stock are acquired, personal information will as a matter of course be one of the transferred assets. In such event, your information would remain subject to the promises made in the pre-existing Privacy Policy prior to the event. Note that this situation is not unique to MyHeritage and applies to most companies.

2) *In legal or privacy circumstances:* (a) if required by law; (b) if required to protect our rights, privacy or reputation, or the property of other users; (c) to enforce our Terms and Conditions or Privacy Policy, or to prevent fraud or cybercrime; or (d) to permit us to pursue available remedies or limit the damages that we may sustain.

3) *To our service providers:* We use several reputable third parties to perform various tasks for us, under the protection of appropriate agreements. For example, we use leading third party platforms to process payments from you (mainly Adyen, Stripe, BlueSnap and PayPal), to provide us with cloud storage services (mainly Amazon and Google Cloud), to assist us in marketing and advertising, consumer research analytics, fraud prevention, security and the processing of customer support requests. In the case of DNA Services, we use DNA test shipping companies (mainly Dotcom and Ingram) as well as the specialized DNA lab Gene by Gene, located in Texas, USA to process, extract and store DNA samples. These third-parties are only given access to the minimal information needed to perform their auxiliary functions and are prohibited from using it for other purposes.

For processing orders for MyHeritage DNA Health kits and Heath Upgrades from customers residing in the United States, we work with an independent network of fully licensed, board certified physicians and genetic counselors, PWNHealth, LLC (www.pwnhealth.com) ("**PWNHealth**"). PWNHealth provides physician oversight and genetic counselling, as required for compliance. For the purpose of PWNHealth's review by a physician and genetic counselor, your personal information, including the Health Questionnaire Information, the DNA Results and the DNA Health Reports will be confidentially shared with PWNHealth.

For processing of customer support requests, we utilize, in addition to our own employees, also the customer support firm Telus International which operates customer support teams on our behalf in Ireland (as of November 2017) and in Guatemala (as of January 2020).

With respect to processors outside the European Economic Area, we attempt to ensure adequate safeguards for your personal information, as required by applicable law.

4) *To your Smart Matches™ and DNA Matches:*

Smart Matches™ is a technology developed and owned by MyHeritage to find matches between family trees, by looking for individuals that they have in common. Smart Matches™ are very useful in that they facilitate discoveries of unknown relatives and reuniting families whose ties have been disconnected over time. Other MyHeritage users may receive notifications regarding Smart Matches™ between individuals in their family tree and individuals in your family tree. Smart Matches™ may also be found on living individuals in your tree. If you are concerned about the privacy of your family tree, to the extent that you do not wish to allow potential relatives to find and view parts of it, you can disable Smart Matches™ for your family tree(s). By default, Smart Matches™ are enabled.

DNA Matches are a key feature of our DNA Services, across MyHeritage DNA kits, DNA data uploads, and MyHeritage DNA Health kits. By default, DNA Matches are enabled.

If you use our DNA Services, when DNA Matches are enabled, your DNA Results will be matched with other users and may be linked to your profile page, and the DNA Genealogy Reports will include a list of your potential relatives, based on DNA. Each one of the people who match your DNA will be able to see the amount of DNA they have in common with you, the predicted family relationship between you, and some of your personal information such as your display name, your country of residence, your ethnic estimate and other profile information, depending on your privacy settings (but none of your DNA Matches will be able to see your DNA Health Reports). If a DNA Match is found between you (or any other person of which you are the DNA manager), and another individual whose DNA Results are stored in our database, both you and such individual will be notified of the match, provided, that, both of you have DNA Matching

enabled in your privacy settings. DNA Matches may have significant personal implications because they may reveal unexpected family connections. This may expose relationships that are not supported by DNA, or DNA may indicate relationships that contradict existing relationships in your family tree. If you use the DNA Services and are concerned about the implications of DNA Matches, you can disable DNA Matches for your profile and for any other profile of which you are the DNA manager. When DNA Matches are disabled, your DNA will not be matched with other people, no DNA Matches will be found, and any DNA Matches found previously will be deleted. If you are unable or unwilling to contend with the consequences and any possible negative impact of such inferences you should not submit DNA samples and/or DNA Results to us, and you should delete your DNA Results and DNA Reports.

5) *To our Genealogy Partners:* Users of our Genealogy Partners may receive Smart Matches (family tree matches) with our users, but such matches are not bi-directional: our users will not receive Smart Matches with the users of our Genealogy Partners and will not be able to see their data.

6) *To a DNA Manager of an Individual:* with respect solely to the DNA Genealogy Services, in case a user uploaded DNA Results or submitted a DNA sample on another individual's behalf (in compliance with our Terms and Conditions), such user is deemed the "DNA manager" and can access, view and manage the individual's DNA Results and DNA Genealogy Reports.

7) *For Research,* in case you agreed to the Informed Consent, for the research purposes indicated therein, your information may be shared with our research collaborators, always without identifying information such as your name, email address, etc.

HOW DO YOU DELETE INFORMATION ABOUT YOURSELF OR YOUR FAMILY, OR REPORT IT TO US?

Deleting your account: [See instructions for deleting your account](#). This will irreversibly delete not only your account and the personal data you've entered but also your family sites, family trees, DNA data and health data.

Deleting your DNA Results and DNA Reports, and Destroying your DNA sample: Your DNA Results and DNA Reports is controlled by you and can be deleted by you at any time by using the delete function from the "Manage DNA kits" page on the Website. You can also request our Customer Support to do this for you. We will, if requested by you, destroy the DNA sample provided by you or your DNA sample which was provided to us by another person with your permission, at any time. To request destruction of your DNA sample, contact us at privacy@myheritage.com.

Deleting your Health Questionnaire Information: you may delete your Health Questionnaire Information by deleting your account or contacting our Customer Support.

Deleting or amending information that others have posted about you or your family: If the information was posted in a family site where you are a member, you may delete it. Otherwise, if you are not able to delete or amend such information posted by another member, contact us at privacy@myheritage.com. We will then correspond with you to understand the specific information that you want to have deleted and will then proceed to delete it for you and resolve the matter promptly.

For disputes or issues with other personal information on the Website about you: You may contact us at privacy@myheritage.com. If you are a registered member of the Website, and you contact us with a request pertaining to information that you entered into the Website, we ask

that you communicate to us from the same email address that you used to register to the Website. Otherwise, we may need to verify your identity before considering your request.

In case you need extra assistance, you may email us at privacy@myheritage.com to request us to help delete any information that you wish to have deleted, and your request shall be carried out promptly by our staff unless it is examined and believed to be illegitimate.

COOKIES AND NON-PERSONAL INFORMATION

Cookies

We make use of browser cookies and similar automated means of data collection technologies to enhance your experience of visiting the website, for example, to avoid displaying certain messages to you more than once, to save your login details so you won't need to re-enter them each time you wish to log in, or to remember the display language you previously selected so you won't need to select it each time you visit the website. You can disable or delete cookies from your computer if you wish, but certain parts of our service may not work correctly or at all if you do so. For more information about our use of cookies and similar automated means of data collection, and how you can choose to disable or delete cookies, please see our Cookie Policy. Our [Cookie Policy](#) is considered a part of, and incorporated into, this Privacy Policy, and this Privacy Policy should be read in conjunction with our Cookie Policy. For more information about cookies including how to set your internet browser to reject cookies please go to www.allaboutcookies.org

Other non-personal information

When you visit our Website, we may automatically collect non-personal information about you, such as the website from which you have come to our Website, your computer type, screen resolution, Operating System version, mobile device details (if applicable) and Internet browser. We may also collect non-personal information such as demographic data, for example your geographic area. Non-personal information also includes personal information that has been aggregated in a manner such that the end-product does not personally identify you or any other user of the Website, for example, by using personal information to calculate the percentage of our users from a particular country or who are female. Because non-personal information does not personally identify you, we may use such non-personal information for any purpose. In addition, we reserve the right to share such non-personal information.

Some web browsers and devices permit you to broadcast a preference that you not be "tracked" online. We do not modify your online experience based upon whether such a signal is broadcast.

SECURITY AND TRANSFER OF INFORMATION

When you provide us with any personal information, that personal information may be transferred to and stored by us in our secure data centers which may provide a different level of protection for personal information than in your country of residence. By providing us with personal or genetic information, you acknowledge and consent to its transfer to our data centers, located in the United States, and to the processing of such information and its storage in them. You accept that the DNA samples will be stored in the United States as provided in the [Terms and Conditions](#).

MyHeritage takes appropriate steps to ensure that transfers of personal information are done in accordance with applicable law and carefully managed to protect your privacy rights and interests. Accordingly, transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights, such as an intra-group transfer agreement. You have a right to contact us for more information about the safeguards we have put in place.

You acknowledge that you provide your personal information at your own risk.

You acknowledge that in the event that you download your DNA Results: 1) such download will create a copy that is not protected by MyHeritage's security and privacy settings; 2) such download and the storage of your DNA Results after you have downloaded it, shall all be made at your own risk; and 3) MyHeritage will not have any control over the downloaded DNA Results and shall not be liable to you or to any third party in connection with such download and/or storage.

We implement and maintain reasonable security, appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. We are committed to developing, implementing, maintaining, monitoring, and updating a reasonable information security program, but no such program can be perfect; in other words, all risks cannot reasonably be eliminated. Data security incidents and breaches can occur due to vulnerabilities, criminal exploits or other factors that cannot reasonably be prevented. Accordingly, while our reasonable security program is designed to manage data security risks and thus help prevent data security incidents and breaches, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security.

You are responsible for keeping your password for the Service confidential. MyHeritage requires you to not share your password with anyone. MyHeritage requires you to not use the same password that you use on MyHeritage on any other service.

MyHeritage will comply with applicable laws in the event of any breach of the security, confidentiality, or integrity of your personal information and, where we consider appropriate or where required by applicable law, notify you via email, in the most expedient time possible and without unreasonable delay, insofar as it is consistent with any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

DATA RETENTION

We will retain your personal information only for as long as necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws. This means that we store your personal information for as long as it is required to deliver our services, except where we have a lawful basis for saving it for an extended period of time (for instance, after your subscription expires, we may still have a legitimate interest in using your contact details for marketing our service to you). We also retain the personal information we need for the execution of pending tasks and to realize our legal rights and our claims, as well as retain certain personal information that we must store for a legally mandatory period of time (in that latter case, the processing of such information by us is limited). If you agreed to the Informed Consent, we may retain the information provided thereunder for as long as we determine required for the research purposes disclosed therein.

In some cases, where you or we delete your content, copies of that information may remain viewable elsewhere to the extent any such copy has been shared with others, was otherwise distributed pursuant to your privacy settings, or was copied or stored by other users. For example, a part of your family tree may have been copied by other users into their own family tree. Removed and deleted information may persist in backup copies for a limited time for our internal business purposes, but it will not be available to you or other users.

DNA Sample Retention

All DNA samples are stored at our testing lab in the United States. A DNA sample may be kept

by us unless or until circumstances require us to destroy the DNA sample, which you can request at any time by contacting us using the contact details below, or it is no longer suitable for testing purposes. We may store the DNA samples for a period of ten years for additional genetic testing, always subject to obtaining your explicit approval in advance for such additional testing.

MANAGING YOUR PRIVACY

You can control how you share personal information by changing your privacy settings in the following areas:

- **Email Preferences:** this allows you to control what marketing emails and other emails we may send you. All non-transactional emails sent to you by MyHeritage have a footer link that leads directly to the Email Preferences page in which you can conveniently turn off any particular email type you do not wish to receive any longer, or re-enable some emails that you have turned off in the past. Family site emails have a link at their footer to the site preferences page which allows you to unsubscribe from or re-subscribe to event reminder emails and family site activity newsletter emails.

MyHeritage typically refrains from sending commercial offers originating from partners, affiliates and third parties. To the extent that MyHeritage sends an offer, it is most likely about a service owned and operated by MyHeritage or integrated into the Service or the MyHeritage Website Group.

- **Privacy Preferences:** this allows you to control the information that others can see about you and your personal information. [See extended details about Privacy Preferences.](#)

YOUR RIGHTS

You may revise your personal information by adjusting your account settings. You also have the right to ask MyHeritage to amend any personal information it holds about you if it is inaccurate or misleading as to any matter of fact. MyHeritage has instituted a process for verifying that the person making a request is the customer about whom we have collected information. We may ask you to provide identifying information to compare it to the personal information already maintained by us. We may require a more stringent verification process depending on the sensitivity of the personal information involved. Any request to amend personal information in MyHeritage's records should be in writing and addressed by email to privacy@myheritage.com.

DATA SUBJECT RIGHTS

MyHeritage members residing in the European Union, the European Economic Area, Andorra, Argentina, Australia, Brazil, California, Canada, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Switzerland, Uruguay, and other jurisdictions have certain data subject rights. These rights vary, but they may include the following rights, which may be subject to certain exemptions: 1.1 The right to access information held about you. This right can normally be exercised free of charge. However, we reserve the right to charge an appropriate administrative fee where permitted by applicable law. 1.2 The right to object to processing which has our legitimate interests as its lawful basis (see "Legal Grounds for the Processing of Personal Information" section above). 1.3 The right to obtain a portable copy of personal information which is processed on the basis of your consent, or which is necessary for the performance of a contract between us (see "Legal Grounds for the Processing of Personal Information" section above). 1.4 The right to request details of the basis

on which your personal information is transferred outside of the European Economic Area. Any request should be in writing and addressed to MyHeritage by email at privacy@myheritage.com or through customer support. MyHeritage will use reasonable efforts to supply personal information about you on its files. MyHeritage shall endeavor to respond as soon as practicably possible.

GDPR

MyHeritage has taken steps to ensure compliance with all applicable privacy laws, including the general data protection regulation (GDPR).

CALIFORNIA PRIVACY RIGHTS AND DISCLOSURES NOTICE

This California Privacy Rights and Disclosure section addresses legal obligations and rights laid out in the California Consumer Privacy Act (CCPA). These obligations and rights apply to businesses doing business in California and to California residents. They apply to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with California consumers or households.

Your Right to Request Disclosure of Information We Collect and Share About You

If you are a California resident, the CCPA grants you the right to request certain information about our practices with respect to your personal information. In particular, you have the right to request that we disclose the following information to you about our processing of your personal information over the past 12 months:

- The categories and specific pieces of your personal information that we've collected
- The categories of sources from which we collected personal information
- The business or commercial purposes for which we collected personal information
- The categories of third parties with which we shared personal information
- The categories of personal information that we've shared with third parties for business or commercial purposes

Your Right to Ask Us Not to Sell Your Personal Information

In the past 12 months, we have not sold your Personal Information to any other entity; and we do not and will not sell Personal Information to third parties.

Your Right To Request The Deletion Of Personal Information We Have Collected From You

Upon your request, we will delete the personal information we have collected about you, except for situations when that information is necessary for us to: provide you with a product or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; comply with or exercise rights provided by the law; or use the information internally in ways that are compatible with the context in which you provided the information to us, or that are reasonably aligned with your expectations based on your relationship with us.

Children's Personal Information

The CCPA has specific rules regarding the use of personal information from consumers under 16 years of age. Our Services are not directed to minors under the age of 16 and we do not sell the Personal Information of minors under 16.

Other California Privacy Rights

California residents are entitled to ask us for a notice describing what categories of personal customer information we share with third parties or corporate affiliates for those third parties or

corporate affiliates' direct marketing purposes. **We do not share your personal information with third parties or corporate affiliates for their direct marketing purposes.**

Exercising Your Rights

To exercise any of the rights described in this Notice, please email privacy@myheritage.com, call us at +1800-987-9000 (toll-free number in the USA) or complete [this form for the right to request deletion](#) or [this form for the right to request disclosure](#). All requesters will be required to authenticate themselves before we respond to their request. You may designate an agent to submit requests on your behalf. If you do so, we will require your written authorization to release your Personal Information to your agent.

If you have an account with us, you will be asked to log in to your account. If you do not have an account with us, you may be asked to provide us with personal information to be matched with information we already have. The number and scope of such personal information will depend on the sensitivity of personal information involved and the risk of harm due to any unlawful disclosure or deletion of such personal information. If we do not have a reasonable method by which we can verify your identity to the degree of certainty required, then your request may be denied.

If you wish to receive further information on our CCPA compliance or have any questions or concerns, please email us at privacy@myheritage.com.

Right to Non-Discrimination

If you exercise any of the rights explained in this Privacy Policy, we will continue to treat you fairly. Consumers who exercise their rights under this Notice will not be denied or charged different prices or rates for goods or services, or provided a different level or quality of goods or services than other Consumers.

NEVADA RESIDENTS

Pursuant to Nevada law, you may direct a commercial operator of a website not to sell certain personal information a business has collected or will collect about you. MyHeritage does not sell personal information as it is described in Nevada law. For more information about how we handle and share your personal information or your rights under Nevada law, contact us at privacy@myheritage.com.

BRAZIL'S DATA PROTECTION LAW

This section addresses the legal obligations and rights laid out in the Lei Geral De Proteção De Dados ("LGPD"), which are applicable if:

- The processing operation is carried out in Brazil
- The purpose of the processing activity is to offer or provide goods or services, or the processing of data of individuals located in Brazil
- The personal data was collected in Brazil

Under the foregoing circumstances, you have the following rights:

- Confirmation of the existence of processing;
- Access to your personal information;
- Correction of incomplete, inaccurate or out-of-date information;
- Portability your personal information;
- Deletion of your personal information;
- Information about third parties with whom personal information is shared;

- Access to this Privacy Policy and the Terms and Conditions;
- To revoke your consent.

All these rights can be exercised free of charge.

To exercise any of the rights described above, please email privacy@myheritage.com.

CHILDREN

Our Services are not directed or targeted to children under the age of 13, and MyHeritage does not knowingly collect personally identifiable information from children under 13. If MyHeritage learns that a child under the age of 13 has provided personally identifiable information to the Website, we will use reasonable efforts to remove such information from our files. If you provide information about a child, you, as parent or legal guardian, consent to the processing and use of such information by us in accordance with this Privacy Policy.

CONTACTING US ABOUT PRIVACY

If you have any questions about this Privacy Policy, the practices of this Website, or your dealings with this Website, you can contact our Data Protection Officer (DPO) via email at dpo@myheritage.com. You can also contact the DPO if you wish to request access to or receive information about the personal information that we maintain about you, and have such information deleted. If you have legitimate reason, you can oppose the processing that was carried out with your personal information. Note that the right to access certain personal information may be limited in some circumstances.