



Dear Sir/Madam,

We are writing regarding your genetic databases. In order to ensure global privacy of sensitive genetic information, we are seeking clarification on your data sharing policies.

We note from your website that Phosphorus complies with the Privacy Shield Policy that makes the company subject to disclosing personal information to public authorities including national security and law enforcement inquiries. I thus seek further information regarding whether or not such information will also be shared with immigration authorities.

We note from your website that de-identified information may be shared with third parties. We thus further seek clarification on data sharing policies with other commercial third parties. This should include, though not be limited to, insurance companies, pharmaceutical companies, other commercial companies, research institutes, and government institutions. Please provide information on any such transfers/ transactions that have taken place. We finally request clarification on what protections are in place to prevent access to identifiable genetic (including re-identifiable) information by third parties, including what policies are in place to prevent data breaches by your organisation or third party collaborators.

Finally, we would like information on compliance under GDPR with regard to data transfer between the US and the EU, United Kingdom, Lichtenstein, Norway, or Iceland. We note that the Privacy Shield Policy is not in compliance with these regulations. As such we seek clarification on what data is transferred between the U.S. and these countries.

The information that is provided, or not provided to us, will be shared with the public in order to promote transparency and to inform on the privacy implications of growing genetic databases. We thus thank you for any information that you can share with us to facilitate this process.

Yours sincerely,

Dr [REDACTED]

Policy Officer

Email: [REDACTED]

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