

## **1 Introduction**

This Data Protection Policy (hereinafter referred to as “Policy”) explains the relevant processing of Personal Data and the relevant data protection rights.

## 2 Definitions

<b>Associates</b>	Directors, officers, managers and employees of CENTOGENE.
<b>CENTOGENE</b>	CENTOGENE N.V.
<b>Consent</b>	Any freely given, specific, informed and withdrawable agreement of an Individual to the processing of his/her Personal Data.
<b>Cookies</b>	Small text files that are stored in the Individual's local browser cache.
<b>Data Processors</b>	External service providers we may use to process Personal Data.
<b>De-facto anonymized or in de-facto anonymized form</b>	The data available at CENTOGENE is reduced to a level, even removing any pseudonyms, which makes re-identification of you as a person for any further recipient of the data practically impossible.
<b>EEA</b>	The European Economic Area (which includes the EU).
<b>EU</b>	The European Union.
<b>GDPR or General Data Protection Regulation</b>	Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
<b>Individual</b>	The natural person to whom the Personal Data relates, this can be a Patient, a Physician, a Healthcare Service Provider or any other person.
<b>Individual's Request</b>	Any request from an Individual to exercise its rights described in Art. 15 – 21 GDPR.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person.
<b>Pseudonymize or Pseudonymization</b>	Processing of data in such a manner that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures. In this case your name and other personal identifiers will be replaced by a particular code (Pseudonym) in the following format: CGXXXXXXXX. Pseudonymized data is still considered to be Personal Data.
<b>Shareholder</b>	A natural or legal person holding or owning shares in CENTOGENE.
<b>TDDDG or Telekommunikation-Digitale-Dienste-Datenschutz-Gesetz</b>	Law on Data Protection and the Protection of Privacy in Telecommunications and Digital Services.
<b>Third Country</b>	Any country outside the EEA.
<b>Third Party</b>	Any person, including a legal entity, that is neither CENTOGENE, an Associate, a Data Processor nor the Individual him- or herself.
<b>Website</b>	<a href="https://investors.centogene.com/">https://investors.centogene.com/</a>

Reference is made to further definitions set forth in Art. 4 GDPR.

## 3 Mandatory information under the GDPR

### 3.1 Responsible controller and contact details

Data controller and responsible entity for the processing of Personal Data is

**CENTOGENE N.V.**  
**Am Strande 7**

**18055 Rostock  
Germany**

("CENTOGENE", "we" or "us") represented by the Executive Board members as listed on our website.

You can reach our data protection officer under the same address with the addition "Attn: Data Protection Officer" or by email under [dataprivacy@centogene.com](mailto:dataprivacy@centogene.com).

### **3.2 Processing of Personal Data**

CENTOGENE processes and stores different kinds of your Personal Data as listed below.

#### **3.2.1 Shareholder**

We collect and process Personal Data of Shareholders, including the following details:

- First and last name, title
- Date of birth,
- Nationality,
- Contact details (e.g. address, e-mail address),
- Share-related data (e.g. class of shares, type of share ownership, number of shares), and
- Other data that arise in the context of the preparation and organisation of the Annual General Meeting (e.g. authorisations, requests for information, motions, election proposals, statements, video messages, speeches by way of video communication, objections, questions for the minutes).

Such Personal Data of a Shareholder will be processed to host and administrate (including voting arrangements) the Annual General Meeting (AGM), Extraordinary General Meeting (EGM) or other statutory meetings, to facilitate shareholder voting at such meetings, to dispatch invitations to shareholders, to respond to your questions before the AGM, process your objections against resolutions or other instructions, related to the AGM or other company meetings. We process your personal data also to comply with our legal obligations, such as regulatory requirements and retention obligations under stock corporation, securities, tax and commercial law.

The legal basis for the data processing is Art. 6 para. 1 (c) and Art. 6 para. 1 (f).

#### **3.2.2 Contact via email or via contact form**

If we are addressed by email or via the contact form we collect and process Personal Data, including the following details:

- personal details (including first name, last name, title),
- date of birth,
- email address,
- phone number,
- country,
- professional title, and
- other (optional) Personal Data (insofar as provided).

Such Personal Data will be processed to answer the respective request. The legal basis for the processing is Art. 6 para. 1 (b) and Art. 6 para. 1 (f) GDPR.

### 3.2.3 Technical data

In general, visitors are able to visit our Website without revealing their identity, except as their identity is necessary to provide a product or service. However, any web browser automatically sends certain technical data, each time our Website is visited. This technical data may include IP address, date and time of the request, access status/ HTTP status code, browser, operating system, language and browser version. Such technical data will be processed to enable the use of our Website, to ensure the permanent functionality and security of our systems, including fraud prevention and internal quality control. Some of this technical data is saved in internal logfiles and will be automatically evaluated solely for statistical, performance and security purposes. The technical data saved in the logfiles allows no direct conclusion to be drawn about the visitor; in particular we store the IP address only in truncated form. The legal basis for the processing is Art. 6 para. 1 (b) and Art. 6 para. 1 (f) GDPR based on our overriding legitimate interest mentioned above.

Any technical data collected on our Website will be stored only for a period of 4 weeks, unless otherwise stated in Annex 1, the technical data is necessary to manage the user account or storage is necessary to comply with applicable laws.

### 3.2.4 Cookies and comparable technologies

We use Cookies and comparable technologies (e.g. web beacons) on our Website.

You can manage your cookie settings under <https://www.centogene.com/#cookie-settings>. Cookies already stored on your device, can be deleted at any time, using the browser functionality. Non acceptance of Cookies, however, can lead to functional restrictions.

A detailed overview of the Cookies used on our Website and their storage period can be found in Annex 1 hereto.

#### a) *Required Cookies and comparable technologies ("Required Cookies")*

Required Cookies are used to enable basic website functionalities such as page navigation, to verify if a visitor has read the cookie notification, and to save visitor's cookie settings. Therefore, we use our own Cookies. Required Cookies cannot be disabled, otherwise our Website would not function correctly. The legal basis for the processing is Art. 6 para. 1 (f) GDPR and Art. 25 para. 2 TDDDG.

#### b) *Statistical Cookies and comparable technologies ("Statistical Cookies")*

Statistical Cookies are used to analyse and improve our Website on the basis of general usage patterns. The legal basis for the processing is Art. 6 para. 1 (a) GDPR.

Our Website uses Statistical Cookies of the following external partners:

##### i. *Google Analytics*

Google Analytics is a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). The technical data generated about the use of the Website will be transmitted to and stored by Google on servers in the United States of America ("USA"). The IP-address will be truncated within the EU or EEA using "anonymizeIP". Based on this technical data, Google evaluates Website usage, compiles reports on website activity and provides us further services relating to website activity and internet usage. Should Personal Data be transmitted to the USA, we have concluded so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries. Further information can be found in Google's Privacy Policy (<https://policies.google.com/privacy>).

*ii. Hotjar*

Hotjar is a web analytics service provided by Hotjar Ltd., Elia Zammit Street 3, St Julians STJ 1000, Malta ("Hotjar"). Hotjar creates so-called heat maps. Heat maps display statistics on mouse movements and clicks on our Website in graphic form. Hotjar collects certain technical data, including the IP address (captured and stored only in pseudonymized form), screen size, type of device (unique device identifiers), browser information, geographic location (country only) and preferred language. Hotjar stores this technical data in a pseudonymized usage profile. Further information can be found in Hotjar's Privacy Policy (<https://www.hotjar.com/legal/policies/privacy/>).

*c) Marketing Cookies and comparable technologies ("Marketing Cookies")*

Marketing Cookies are used to provide relevant content on our products and services. The legal basis for the processing is Art. 6 para. 1 (a) GDPR.

Our Website uses Marketing Cookies of the following external partners:

*i. Facebook Pixel / Facebook Custom Audience*

Facebook Pixel provided by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland ("Facebook") is a tool to generate a Facebook customer list ("Custom Audience") and enables us to display individualised advertising messages and analyse customer behaviour. When someone visits our Website and takes an action, the Facebook Pixel is triggered and reports this action. This way, we know when a customer took an action after seeing our Facebook ad. Furthermore, we are able to reach this customer again by using such Custom Audience. Any data is locally hashed before it is transmitted to Facebook. Should Personal Data be transmitted to the USA, we have concluded so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries. We are joint controllers with Facebook for the processing of Personal Data as part of this process. You can find the joint controller agreement under [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). Further information on data processing can be found in Facebook's Data Policy (<https://mbasic.facebook.com/privacy/policy/printable/>).

*ii. Google AdWords conversion tracking and remarketing*

AdWords conversion tracking and AdWords is a remarketing services of Google. AdWords conversion tracking captures specific customer actions (such as clicking on an advertisement, page call-ups, downloads) and analyses them. AdWords remarketing is used to display individualised advertising messages to website visitors. Should Personal Data be transmitted to the USA, we have concluded so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries. Further information can be found in Google's Privacy Policy (<https://policies.google.com/privacy>).

*iii. Google Double Click*

DoubleClick by Google uses cookies and similar technologies to show advertisements which might be interesting for Website visitors. The use of DoubleClick enables Google and its partner websites to insert advertisements on the basis of previous visits to our or other websites on the internet. Should Personal Data be transmitted to the USA, we have concluded so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries. Further information can be found in Google's Privacy Policy (<https://policies.google.com/privacy>).

*iv. LinkedIn Insight Tag*

LinkedIn Insight Tag provided by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA ("LinkedIn"), enables the collection of technical data regarding LinkedIn members' visits to our Website, including the URL, referrer, IP address, device and browser characteristics (User Agent), and timestamp. The IP addresses

are truncated or (when used for reaching members across devices (<https://www.linkedin.com/help/lms/answer/a1445770>)) hashed, and LinkedIn members' direct identifiers are removed within seven days in order to make the data pseudonymous. This remaining pseudonymized data is then deleted within 180 days. LinkedIn does not share the Personal Data with us. LinkedIn only provides reports (which do not identify the LinkedIn member) about the website audience and ad performance. LinkedIn also provides retargeting for website visitors (up to 90 days after the visit), enabling us to show personalized ads off our website. We use technical data that does not identify an Individual to improve ad relevance and reach members (<https://www.linkedin.com/help/lms/answer/a1445770>).

LinkedIn members can control the use of their Personal Data for advertising purposes through their account settings. Should Personal Data be transmitted to the USA, we have concluded so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries. Further information can be found in LinkedIn's Privacy Policy (<https://www.linkedin.com/legal/privacy-policy>).

v. *YouTube*

YouTube is a video platform provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google collects certain technical data, every time a user watches a video. This technical data enables Google to keep statistics of which videos from YouTube a user has watched. Should Personal Data be transmitted to the USA, we have concluded so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries. Further information can be found in Google's Privacy Policy (<https://policies.google.com/privacy>).

vi. *Pardot Marketing Automation System*

Pardot Marketing Automation System ("Pardot MAS") is a service provided by salesforce.com, inc., 415 Mission Street, San Francisco, CA 94105, USA ("Salesforce"). Pardot MAS gathers and evaluates technical data about website usage. Once our Website are visited, Pardot MAS records the click path and creates a pseudonymized usage profile. Based on this technical data, we can provide relevant content about our products and services. Should Personal Data be transmitted to the USA, we have concluded so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries Further information can be found in Salesforce's Privacy Policy (<https://www.salesforce.com/company/privacy/>).

### **3.2.5 Recipients**

Transfer of Personal Data to a Third Party only takes place with either explicit Consent, in order to fulfill a legal obligation or if such transfer is otherwise permitted by law. In this regard, please be informed as follows: In principle, we process Personal Data ourselves. However, we use Data Processors, e.g. IT-service providers that maintain our systems as well as data centers which host such systems. These third-party services are then considered as Data Processors under GDPR. Such Data Processors have been carefully selected, are contractually bound to comply with data protection laws, are subject to our instructions and to regular monitoring and are only allowed to use Personal Data to fulfil their contractual obligations.

### **3.2.6 International transfer**

In principle, we process Personal Data within Germany, the EU or the EEA. In certain cases, however, we may be required to transfer Personal Data to a Third Country, where GDPR provisions do not apply, e.g. if one of our Data Processor is located in a Third Country.

However, such transfer shall only take place (i) with either explicit Consent, (ii) if the European Commission has decided that such Third Country already provides an adequate level of protection or (iii) if we establish appropriate safeguards with our contractual partner; e.g. by concluding so called EU Standard Contractual Clauses for data transfers between EU and non-EU countries with the Third Country recipient, which are

compliant with GDPR requirements. In such case you have a right to request a copy of the EU Standard Contractual Clauses. To do so please contact us via the contact details provided under 3.1 Responsible controller and contact details.

### **3.2.7 Retention period**

Unless otherwise stated in this Policy we store Personal Data only for as long as necessary to fulfil our contractual obligations. However, we are required to store certain Personal Data longer for statutory reasons. In particular we are obliged to store certain Personal Data for a mandatory period up to 10 years under applicable law. Furthermore, we may process and store certain Personal Data for the purpose of evidence in civil claims.

In case we received consent for the data processing, we store the data until consent is withdrawn and/or the data is necessary to fulfil the purposes of the respective data processing, unless we are required to store certain Personal Data longer for statutory reasons as described above.

### **3.3 Data Protection Rights**

You have the following data protection rights, which you can exercise at any time at the address mentioned at “3.1 Responsible data controller and contact details” with the addition “Attn: Data Protection Officer” or by email at [dataprivacy@centogene.com](mailto:dataprivacy@centogene.com).

#### **3.3.1 Right of access**

You have the right to know if and which Personal Data of yours is processed and stored. Furthermore, you can request a copy of your Personal Data free of charge.

#### **3.3.2 Right to data portability**

You have the right to receive your Personal Data, which you have provided to the Study Site and/or CENTOGENE, in a structured, commonly used and machine-readable format. Furthermore, you may have your Personal Data transferred to another legal entity. E.g. you can ask for an excerpt of the Personal Data you have provided to the Study Site and/ CENTOGENE in a PDF file.

#### **3.3.3 Right to rectification**

You have the right to obtain rectification of your inaccurate Personal Data, and the right to have your incomplete Personal Data completed. E.g. if your name is spelled wrong, you can ask to correct it.

#### **3.3.4 Right to erasure**

You have the right to have your Personal Data deleted. However, we may be required by applicable laws to store certain Personal Data after receiving a request to delete such data though. Further information can be found under 3.2.9 Retention period.

#### **3.3.5 Right to restriction of processing**

You have the right to obtain restriction of the processing of your Personal Data.

#### **3.3.6 Right to object**

**You have the right to object to the processing of your Personal Data, if the processing is based on CENTOGENE’s legitimate interest or if your Personal Data are processed for direct marketing purposes.**

### **3.3.7 Right to lodge a complaint**

You have the right to file a complaint with the competent supervisory authority. In Rostock, the responsible supervisory authority is "**Der Landesbeauftragte für Datenschutz und Informationsfreiheit Mecklenburg-Vorpommern**", **Werderstraße 74a, 19055 Schwerin**, <https://www.datenschutz-mv.de>. You can also contact the supervisory authority of your place of residence, place of work or at the place where the alleged infringement occurred.

### **3.3.8 Right to withdraw a consent**

Insofar as the processing of your Personal Data is based on your Consent, you have the right to withdraw your Consent at any time with effect for the future.

### **3.3.9 Applicable national laws**

Any further or modified rights under applicable national laws remain unaffected by the rights set forth herein.

### **3.3.10 Procedure**

In general, CENTOGENE will respond to Individuals without undue delay and no later than one (1) month after receiving an Individual's Request. In exceptional cases, CENTOGENE may extend this period by two (2) further months with prior notice. If an Individual's Request does not contain sufficient detail, CENTOGENE reserves the right to request additional information. CENTOGENE will provide the Individual with an explanation for any denied Individual's Request.

## **4 Changes to this Policy**

CENTOGENE is dedicated to the highest standards and to continuously improve its services. Therefore, we may change our services from time to time. Such changes may affect the Processing of Personal Data. We reserve the right to amend this Policy at any time. The current version is available at [www.centogene.com](http://www.centogene.com). We advise you to inform yourself in regular intervals about the current status of this Policy.

This version of this Policy is effective from March 2025.

**Annex 1 – Overview of Cookies**

www.investors.centogene.com

Cookie Type	Provided by	Name	Purpose	Lifespan
Required	Centogene	PHPSESSID	This is a general-purpose identifier used to maintain user session variables.	Duration of the session: the cookie is deleted when the browser is closed.
Required	Centogene	fe_typo_user	Preserves user states across page requests.	Duration of the session: the cookie is deleted when the browser is closed.
Required	Centogene	cookieNotificationVisited	To check, if visitor read cookie notification	1 year
Required	Centogene	PermissionCookie	To check, if visitor allowed to use cookies	1 year
Required	Centogene	PermissionCookieVersion	To check if the user has seen the latest version of the cookie notification	1 year
Statistical	Google	_ga	Google Analytics Cookie tracks site visits.	10 min
Statistical	Google	_gat	Google Tag Manager Cookie	10 min
Statistical	Google	_gid	Google Analytics Cookie for storing randomly generated ids about the user.	Duration of the session: the cookie is deleted when the browser is closed.
Statistical	Hotjar	_hjIncludedInSample	Hotjar cookie: Determines if the user's navigation should be registered in a certain statistical place holder. This is a general-purpose identifier used to maintain user session variables.	Duration of the session: the cookie is deleted when the browser is closed.
Statistical	Hotjar	_hjid	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	1 year
Marketing	Facebook	fr	Facebook uses the 'fr' cookie to deliver, measure and improve the relevancy of ads.	3 months
Marketing	Facebook	tr	Used by Facebook to show various kinds of advertising, for example real-time offers from third party advertisers.	Session
Marketing	Google	ads/ga-audiences	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behavior across websites.	Session
Marketing	Google	NID	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads.	6 months
Marketing	Google	IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the	1 year

			advertiser's ads with the purpose of measuring the efficiency of an ad and to present targeted ads to the user.	
<b>Marketing</b>	LinkedIn	UserMatchHistory	LinkedIn Ads ID syncing	30 days
<b>Marketing</b>	LinkedIn	li_sugr	Browser Identifier	3 months
<b>Marketing</b>	LinkedIn	li-oatml	Member indirect identifier for conversion tracking, retargeting, analytics	1 month
<b>Marketing</b>	Various, first party domain	li_fat_id	Member indirect identifier for conversion tracking, retargeting, analytics	1 month
<b>Marketing</b>	.adsymptomatic.com	U	Browser Identifier	3 months
<b>Marketing</b>	YouTube	GPS	Registers a unique ID on mobile devices to enable tracking based on geographical GPS location	1 day
<b>Marketing</b>	YouTube	YSC	Registers a unique ID to keep statistics of which videos from YouTube a user has watched	Duration of the session: the cookie is deleted when the browser is closed.
<b>Marketing</b>	Salesforce	pardot	Used to identify the visitor across visits and devices.	Session
<b>Marketing</b>	Salesforce	visitor_id486591	Pardot cookie: tracks site visits.	1 year
<b>Marketing</b>	Salesforce	visitor_id486591-hash	Pardot cookie: tracks site visits	1 year