Privacy Policy

1 Introduction and Scope

Proscia, Inc. ("Proscia," "we," "our," or "us") is a United States–headquartered technology company that manufactures and operates an FDA 510(k)-cleared, Health Canada–licensed, and CE-marked AI-enabled digital pathology platform. Proscia's Concentriq® platform is used by pathologists, laboratory professionals, and life sciences researchers worldwide to digitize, manage, analyze, and share pathology data.

This Privacy Policy describes how Proscia, Inc. and its European Union affiliate, Proscia Ireland (collectively, "Proscia"), collect, use, disclose, and protect personal data in connection with:

- the Proscia website located at www.proscia.com (the "Website");
- the Concentriq digital pathology platform and related services (the "Platform"); and
- any other interactions you may have with us, including inquiries, job applications, and data subject rights requests.

This Privacy Policy applies to individuals located in the United States, the European Union, the United Kingdom, and other jurisdictions where Proscia operates. Where applicable legal requirements differ between jurisdictions, we have included jurisdiction-specific provisions within the relevant sections of this Policy.

1.1 What This Policy Does Not Cover

This Privacy Policy does not apply to:

- **Protected health information (PHI) governed by HIPAA.** This Privacy Policy does not govern the processing of protected health information (PHI) received through the Platform to the extent such processing is regulated exclusively under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations. Proscia's obligations with respect to PHI received from laboratory customers are governed by the applicable Business Associate Agreement between Proscia and the laboratory. This Privacy Policy does, however, describe the security measures and organizational safeguards that apply to all data processed by Proscia, including PHI.
- **Third-party websites and services.** Our Website may contain links to third-party websites, applications, or services. Proscia is not responsible for the privacy practices of those third parties. We encourage you to review their privacy policies before providing any personal data.

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2 Identity and Contact Details of the Data Controllers

Depending on where you are located and how you interact with Proscia, one or both of the following entities may act as the controller of your personal data:

	Proscia, Inc. (U.S.)	Proscia Ireland
Role	Data controller for U.S. data processing and global Website operations	Data controller for EU/UK/EEA data processing in connection with laboratory Platform services
Address	Philadelphia, Pennsylvania, USA	Ireland
Data Protection Officer	Coleman Stavish	Coleman Stavish
Contact Email	privacy@proscia.com	privacy@proscia.com

For EU and UK data subjects, Coleman Stavish serves as the designated Data Protection Officer (DPO) and may be contacted at privacy@proscia.com for any questions or concerns regarding the processing of personal data.

3 Information We Collect and How We Use It

Proscia collects and processes personal data in the following contexts. The types of data collected and the purposes for which it is used vary depending on the nature of your interaction with us.

3.1 Website Data

When you visit the Website, submit a "Contact Us" form, sign up for our newsletter, request a product demonstration, or register for a webinar, we may collect the following personal data:

- Name
- Email address
- Phone number
- Employer or organization name
- Job title
- Any additional information you choose to include in your inquiry

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Purpose: We use this data to respond to your inquiry, provide information about our products and services, send you communications you have requested, and for internal business development and marketing analytics.

3.2 Recruitment Data

When you apply for a position at Proscia through the Website or other channels, we may collect:

- Name and contact details (address, telephone number, email)
- Employment history and references
- Education history and qualifications
- Right-to-work documentation
- Any other information you choose to include in your application materials

Purpose: We use this data to evaluate your application, manage the recruitment process, comply with applicable employment laws, and, where permitted, to contact you about future opportunities.

3.3 Data Subject Rights Request Data

When you submit a data subject access request (DSAR) or exercise any other data protection right, we collect:

- Name and contact information
- Information necessary to verify your identity
- Details of your request

Purpose: We use this data to verify your identity, process your request in accordance with applicable data protection laws (including the GDPR, UK GDPR, and U.S. federal requirements), and maintain records of our compliance activities.

3.4 Platform Services Data

Proscia's Concentriq digital pathology platform processes data received from clinical laboratory customers in the course of providing our digital pathology platform. Depending on the laboratory's configuration and applicable regulations, this data may include protected health information (PHI) as defined under HIPAA, such as:

- Patient names
- Case names and case identifiers

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- Dates of service
- Laboratory and referring physician information
- Other information related to diagnosis

The Platform also processes digitized whole-slide images, associated metadata, and algorithmic analysis results. In some configurations, laboratory customers may de-identify or pseudonymize data before uploading it to the Platform, in which case the data will no longer constitute PHI. Proscia's laboratory customers determine the scope of data uploaded and are responsible for ensuring compliance with their own regulatory obligations, including HIPAA, prior to transmission.

To the extent that Proscia processes PHI on behalf of a laboratory customer, Proscia acts as a Business Associate under HIPAA and processes such data in accordance with an executed Business Associate Agreement (BAA). Proscia does not use or disclose PHI except as permitted by the BAA and applicable law.

> ***Important:*** Proscia does not collect, receive, or process PHI through its Website (www.proscia.com). The Website collects only the categories of personal data described in Sections 3.1 through 3.3 of this Policy (website inquiries, recruitment data, and data subject rights requests). PHI is processed exclusively through the Concentriq Platform in connection with services provided to laboratory customers under a BAA.

3.5 Life Sciences Services

In connection with its life sciences services, Proscia may sublicense de-identified or pseudonymized pathology data to third-party pharmaceutical and life sciences companies for scientific research purposes, including the development and validation of diagnostic algorithms and computational pathology models.

No re-identification. The data sublicensed to life sciences companies does not contain any directly identifiable patient information. Proscia contractually prohibits sublicensees from attempting to re-identify any individual from the data. Proscia does not share, sell, or otherwise disclose identifiable personal data to life sciences companies.

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3.6 Third-Party AI Assistant Integrations (MCP)

Authorized Platform users can connect a third-party AI assistant, such as Claude or ChatGPT, to the Platform using the Model Context Protocol ("MCP"). When they do, we collect the user's identity from their organization's sign-in (email address and account identifiers), the requests the assistant makes on the user's behalf, and the Platform data returned in response, such as slide images, metadata, annotations, and analysis results. Access is limited to the user's existing Platform permissions. We use this data to verify the user's identity, respond to the assistant's requests, and keep the service secure and working properly. Data accessed through MCP integrations is retained as described for Platform data in Section 5.

4 Lawful Bases for Processing (GDPR / UK GDPR)

Under the GDPR (EU) and UK GDPR, we are required to identify a lawful basis for each category of personal data processing. The table below sets out the lawful bases on which we rely.

Processing Activity	Lawful Basis	Explanation
Website inquiries and marketing communications	Legitimate interests (Art. 6(1)(f))	Responding to inquiries, providing requested information, and conducting business development. You may opt out of marketing communications at any time.
Recruitment and job applications	Contractual necessity (Art. 6(1)(b)); Legal obligation (Art. 6(1)(c))	Taking pre-contractual steps at the applicant's request and complying with applicable employment and immigration laws.
Data subject rights requests (DSARs)	Legal obligation (Art. 6(1)(c))	Fulfilling our obligations under the GDPR, UK GDPR, and other applicable data protection laws to respond to data subject rights requests.
Platform services (pathology data, including PHI where applicable)	Legitimate interests (Art. 6(1)(f))	Providing digital pathology services to laboratory customers, improving diagnostic accuracy, and advancing the quality of patient care. To the extent the Platform processes PHI of U.S. individuals, such processing is governed by HIPAA and the applicable Business Associate Agreement. A legitimate interest assessment has been conducted and is available upon request.

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Processing Activity	Lawful Basis	Explanation
Life sciences sublicensing (de-identified and pseudonymized data)	Legitimate interests (Art. 6(1)(f))	Advancing medical and scientific research by enabling life sciences companies to develop and validate diagnostic tools and computational pathology models using de-identified data.
Cookies and website analytics	Consent (Art. 6(1)(a))	For EU/UK visitors, we obtain affirmative consent through our cookie consent banner before placing non-essential cookies, consistent with the ePrivacy Directive. For U.S. visitors, non-essential performance and functional cookies may be placed upon page load, with the option to opt out at any time. Targeting cookies require affirmative consent in all jurisdictions.

Where we rely on legitimate interests, we have conducted a balancing test to ensure that our interests are not overridden by your fundamental rights and freedoms. You may request a copy of our legitimate interest assessments by contacting us at privacy@proscia.com.

Where we rely on consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

5 Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required or permitted by applicable law. The following table sets out our standard retention periods:

Data Category	Retention Period	Notes
Website inquiry data	24 months from last interaction	Deleted or anonymized after expiry unless a continuing business relationship exists.
Recruitment data	12 months after hiring decision	May be retained longer where required by applicable employment law or with the applicant's consent.
DSAR records	3 years from resolution of the request	Retained to demonstrate compliance with data protection obligations.

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Data Category	Retention Period	Notes
Platform data (including PHI where applicable)	As defined by customer agreements	Retention governed by the applicable service agreement or Business Associate Agreement between Proscia and the laboratory customer, and by applicable HIPAA retention requirements where PHI is involved.
Session cookies	Duration of browser session	Deleted when the browser is closed.
Persistent cookies	Up to 13 months	Consent choices retained for a maximum of 13 months, consistent with CNIL and EDPB guidance.

When personal data is no longer required, it is securely deleted or anonymized in accordance with our data retention and destruction procedures. For more information about our retention practices, please contact us at privacy@proscia.com.

6 Data Sharing and Recipients

Proscia does not sell your personal data to third parties. We may share personal data with the following categories of recipients, in each case only to the extent necessary for the purposes described in this Policy:

6.1 Cloud Hosting Providers

Proscia uses Amazon Web Services (AWS) to host its Platform and store data. EU/UK personal data is stored exclusively on AWS servers located in Ireland. U.S. data is stored on AWS servers in the United States.

6.2 IT and Security Service Providers

We engage third-party service providers to assist with information technology, cybersecurity, and infrastructure management. These providers process personal data only on our instructions and are bound by contractual data processing agreements.

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6.3 Life Sciences Services

As described in Section 3.5, Proscia may sublicense de-identified or pseudonymized pathology data to pharmaceutical and life sciences companies for research purposes. No PHI or other identifiable personal data is shared with these parties. Data sublicensed for research purposes is de-identified or pseudonymized before it is made available to any sublicensee.

6.4 Professional Advisors

We may share personal data with our legal, accounting, and professional advisory firms as necessary to obtain professional advice and manage legal proceedings or regulatory inquiries.

6.5 Regulatory and Law Enforcement Authorities

We may disclose personal data to governmental, regulatory, or law enforcement authorities where required by applicable law, regulation, court order, or governmental request, or where necessary to protect our legal rights.

6.6 Corporate Transactions

In connection with any merger, acquisition, reorganization, sale of assets, or similar transaction, personal data may be transferred as part of the business assets, subject to applicable data protection requirements.

6.7 No Sale of Personal Data

Proscia does not sell personal data to third parties, and does not share personal data with third parties for their own direct marketing purposes.

6.8 AI Assistants Chosen by Customers

When an authorized user connects a third-party AI assistant to the Platform, data the user requests through that assistant is sent to its provider at the user's direction, including where that provider is located outside the EEA or UK. The customer's agreement with that provider governs how the data is handled. Such transfers are made by the customer and are not onward transfers by Proscia.

7 International Data Transfers and Data Localization

Proscia maintains a data localization architecture designed to ensure that personal data is processed and stored in accordance with the data protection requirements of the jurisdiction in which it originates.

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7.1 EU/UK Data Localization

EU and UK personal data is stored exclusively on AWS servers located in Ireland. This data is not transferred to the United States or any other jurisdiction outside the European Economic Area or the United Kingdom.

Proscia maintains full data segmentation by region, meaning that EU/UK personal data is logically and physically separated from data originating in other jurisdictions. This architecture is supported by the following technical and organizational safeguards:

- Data is encrypted at rest and in transit using industry-standard encryption protocols.
- Access controls are implemented to ensure that only authorized personnel with a legitimate business need may access the data.
- Proscia maintains SOC 2 Type II, ISO 27001, and ISO 13485 certifications, reflecting its commitment to information security and quality management standards.
- Regular security assessments, vulnerability testing, and monitoring are conducted to ensure the ongoing integrity and confidentiality of the data.

7.2 U.S. Website Data

Personal data collected through the Website (e.g., contact form submissions from U.S.-based individuals) may be processed and stored on servers located in the United States. Where personal data of EU/UK residents is collected through the Website and processed in the United States, Proscia relies on appropriate safeguards, including:

- The EU-U.S. Data Privacy Framework (DPF), as applicable; and/or
- Standard Contractual Clauses (SCCs) approved by the European Commission.

You may request a copy of the applicable transfer safeguards by contacting us at privacy@proscia.com.

7.3 No Onward Transfers of EU/UK Platform Data

Proscia does not make onward transfers of EU/UK personal data processed through its Platform to any third country. All Platform services for EU/UK laboratory customers are delivered from infrastructure located within Ireland.

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8 Data Security

Proscia is committed to protecting the personal data entrusted to it. We implement and maintain appropriate technical and organizational measures to safeguard personal data against unauthorized access, loss, misuse, alteration, and destruction. These measures include, but are not limited to:

- **Encryption:** All personal data is encrypted at rest using AES-256 encryption and in transit using TLS 1.2 or higher.
- **Access controls:** Role-based access controls and the principle of least privilege ensure that only authorized personnel with a demonstrated business need can access personal data.
- **Certifications:** Proscia maintains SOC 2 Type II, ISO 27001, and ISO 13485 certifications, independently audited on a regular basis.
- **Monitoring and logging:** Continuous monitoring, intrusion detection, and audit logging are employed to detect and respond to potential security incidents.
- **Incident response:** Proscia maintains a documented incident response plan and will notify affected individuals and relevant supervisory authorities of a personal data breach in accordance with applicable law.
- **Vendor management:** Third-party service providers are subject to due diligence review and are contractually required to maintain appropriate security measures.
- **Infrastructure:** The Platform is hosted on AWS infrastructure with a 99.95% uptime SLA and built-in redundancy across regions.

While we strive to protect your personal data, no method of transmission over the Internet or method of electronic storage is completely secure. We cannot guarantee the absolute security of your data, but we are committed to implementing industry-leading safeguards.

9 Cookies and Tracking Technologies

9.1 What Are Cookies?

Cookies are small text files that are placed on your device when you visit a website. Cookies allow the website to recognize your device and store certain information about your preferences or past actions. Proscia uses cookies and similar tracking technologies on the Website to enhance your experience and collect analytics data.

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9.2 Categories of Cookies

The following table describes the categories of cookies used on the Website:

Category	Purpose	Examples	Duration
Strictly Necessary	Essential for the Website to function. These cookies enable core functionality such as security, session management, and accessibility. They cannot be switched off.	Session management, CSRF protection	Session
Performance & Analytics	Collect information about how visitors use the Website, including which pages are visited most often and whether visitors encounter error messages. All information is aggregated and anonymized.	Google Analytics	Up to 13 months
Functional	Enable the Website to provide enhanced functionality and personalization, such as remembering your preferences or pre-filling forms.	Language, region, form auto-fill	Up to 12 months
Targeting & Marketing	Used to deliver advertisements relevant to you and your interests, and to measure the effectiveness of marketing campaigns.	Pardot, Salesforce	Up to 13 months

9.3 Consent and Opt-Out Mechanisms

Proscia's approach to cookies varies by jurisdiction. The consent and opt-out mechanisms that apply to you depend on where you access the Website and the applicable legal framework.

For visitors accessing the Website from the European Union or the United Kingdom, the GDPR, UK GDPR, and the ePrivacy Directive (Directive 2002/58/EC, as amended) require Proscia to obtain affirmative, informed consent before placing non-essential cookies (performance, functional, and targeting cookies) on a visitor's device. EU/UK visitors are presented with a cookie consent banner on their first visit that clearly identifies each category of cookie and allows granular opt-in or opt-out. No non-essential cookies are placed until the visitor provides affirmative consent. Consent preferences are stored for up to 13 months, consistent with CNIL and EDPB guidance, after which re-consent is requested. Visitors may modify their preferences at any time via the "Cookie Settings" link in the Website footer.

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For visitors accessing the Website from the United States, where no comprehensive federal cookie consent law currently imposes an opt-in requirement, Proscia may place performance and functional cookies upon page load to support Website functionality and analytics. U.S. visitors may opt out of non-essential cookies at any time through the “Cookie Settings” link in the Website footer or by adjusting their browser settings. Targeting and marketing cookies are activated only with the visitor’s affirmative consent, regardless of jurisdiction.

Strictly necessary cookies do not require consent as they are essential for the Website to function. This exemption applies uniformly across all jurisdictions because these cookies are essential to Website functionality and do not require consent under either EU/UK or U.S. frameworks.

9.4 Managing Your Cookie Preferences

Regardless of your location, you may manage cookies through your browser settings. Most web browsers allow you to block, delete, or disable cookies. EU/UK visitors may also modify their granular cookie preferences at any time through the cookie consent banner. U.S. visitors may use the “Cookie Settings” link in the Website footer or browser-level controls to opt out of non-essential cookies. Disabling cookies may affect the functionality of certain parts of the Website. For more information about managing cookies, visit www.allaboutcookies.org.

9.5 Do Not Track

The Website does not currently respond to "Do Not Track" (DNT) browser signals. There is no uniform standard for how DNT signals should be interpreted, and accordingly, we do not alter our data collection or use practices in response to DNT signals at this time.

9.6 Usage Data /Analytics:

The parties acknowledge and agree that Proscia may monitor, collect, use, and store data relating to the Company’s and Authorized Users’ use of the software and/or services, excluding Company Data (“Usage Data”). The Company hereby grants to Proscia an irrevocable, non-exclusive, royalty-free, worldwide, perpetual license to the Usage Data for any lawful business purpose, including, without limitation, enhancing and improving the software and services and their components, developing new features and functionality, and supporting business intelligence, analytics, and operational initiatives.

Proscia may utilize embedded or integrated tools and technologies within the software or services to facilitate the collection and analysis of Usage Data and related product analytics regarding Authorized Users’ interactions with the software. Such tools may be operated by or on behalf of Proscia and shall not be deemed “third parties” for purposes of this Section.

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Proscia shall not disclose Usage Data to any third parties external to Proscia, except in aggregated or anonymized form that does not identify the Company.

10 Your Data Protection Rights

Depending on your location and the applicable data protection law, you may have the following rights with respect to your personal data:

- **Right of access:** You have the right to request a copy of the personal data we hold about you, together with information about how we process it.
- **Right to rectification:** You have the right to request correction of any inaccurate or incomplete personal data.
- **Right to erasure ("right to be forgotten"):** You have the right to request deletion of your personal data, subject to certain legal exceptions.
- **Right to restriction of processing:** You have the right to request that we limit the processing of your personal data in certain circumstances.
- **Right to data portability:** Where processing is based on consent or a contract and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to object:** You have the right to object to the processing of your personal data where we rely on legitimate interests as our lawful basis. We will cease processing unless we can demonstrate compelling legitimate grounds.
- **Rights related to automated decision-making:** You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or similarly significantly affects you. Proscia does not currently engage in solely automated decision-making with respect to personal data covered by this Policy.
- **Right to withdraw consent:** Where processing is based on your consent, you have the right to withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

10.1 How to Exercise Your Rights

To exercise any of the rights described above, please submit a request by emailing privacy@proscia.com. We will verify your identity before processing your request.

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10.2 Response Timeframe

We will respond to your request without undue delay and in any event within one (1) month of receipt. If your request is particularly complex or we receive a large number of requests, we may extend this period by up to two (2) additional months. We will inform you of any such extension within the initial one-month period, together with the reasons for the delay.

10.3 Right to Lodge a Complaint

If you believe that our processing of your personal data infringes applicable data protection law, you have the right to lodge a complaint with a supervisory authority. See Section 11 for the relevant supervisory authorities.

11 Additional Information for EU and UK Residents

This section provides additional disclosures required under the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the UK General Data Protection Regulation ("UK GDPR").

11.1 Lead Supervisory Authority (EU)

For EU data subjects, the lead supervisory authority for Proscia Ireland is the Irish Data Protection Commission (DPC).

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

Website: https://www.dataprotection.ie

Email: info@dataprotection.ie

11.2 UK Supervisory Authority

For UK data subjects, the relevant supervisory authority is the Information Commissioner's Office (ICO).

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, United Kingdom

Helpline: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

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11.3 GDPR / UK GDPR Specific Provisions

The following provisions apply specifically to the processing of personal data of individuals located in the EU or UK:

- **Controller identification:** Proscia Ireland acts as the data controller for personal data processed in connection with Platform services delivered to EU/UK laboratory customers. Proscia, Inc. acts as the data controller for personal data collected through the Website.
- **Data localization:** As described in Section 7, EU/UK personal data processed through the Platform is stored exclusively on AWS servers in Ireland and is not transferred to any third country.
- **Lawful bases:** The lawful bases for each processing activity are set out in Section 4.
- **Automated decision-making:** Proscia does not engage in solely automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you.
- **Provision of data:** Providing personal data through the Website (e.g., via contact forms) is voluntary. However, failure to provide certain data may prevent us from responding to your inquiry or processing your application.

12 Children's Privacy

The Website and Platform are not directed at children. Proscia does not knowingly collect personal data from children under the age of sixteen (16) in the EU and UK, or under the age of thirteen (13) in the United States. If we become aware that we have collected personal data from a child below the applicable age threshold without verifiable parental consent, we will take steps to delete such data promptly. If you believe that we may have collected personal data from a child, please contact us at privacy@proscia.com.

13 Third-Party Links

The Website may contain links to websites operated by third parties. Proscia does not control and is not responsible for the privacy practices or content of those third-party websites. We encourage you to review the privacy policies of any third-party website you visit before providing any personal data.

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14 Changes to This Privacy Policy

Proscia reserves the right to update or modify this Privacy Policy at any time. When we make material changes, we will:

- Update the "Effective Date" and "Version" at the top of this document.
- Post the updated Privacy Policy on the Website.
- Where required by applicable law, provide notice of material changes through a prominent banner on the Website, by email, or through other appropriate communication channels.

We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your personal data.

15 Contact Information

If you have any questions, comments, or concerns about this Privacy Policy or our data processing practices, please contact us:

Data Protection Officer: Coleman Stavish

Email: privacy@proscia.com

Website: www.proscia.com

We welcome your feedback and will endeavor to respond to all inquiries within a reasonable timeframe.

16 Version History

Version	Date	Description
1.0	November 23, 2026	Initial publication of this updated Proscia, Inc. Privacy Policy.

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