

IPA Investigator Privacy Notice of the QIAGEN Group

1. What is this Privacy Notice about?

The QIAGEN Group («QIAGEN», «we», «us») is committed to protecting the personal data it collects and processes about you and other individuals. We use «data» here interchangeably with «personal data». In this Privacy Notice, we describe what we do with your data when you use and interact with IPA Investigator («IPA Investigator»), an AI-powered chatbot made available in connection with QIAGEN Ingenuity Pathway Analysis («IPA»).

IPA Investigator is designed to support authorized IPA users by providing conversational assistance relating to IPA functionality, IPA-related documentation, QIAGEN content and other information made available to it in connection with IPA. When you use IPA Investigator, you are interacting with an artificial intelligence system. Responses are generated automatically by AI and may not always be accurate, complete, or up to date.

IPA Investigator is intended for adults and for authorized professional IPA users. It is not directed at children, and we do not knowingly collect personal data from individuals under the age of 16 (or, where local law requires a higher age threshold, the applicable minimum age). If you become aware that a child has provided personal data through IPA Investigator, please contact us using the details in Section 2.

For the collection and processing of personal data beyond this scope and unrelated to IPA Investigator, please consult our general Privacy Policy available at:

<https://www.qiagen.com/us/privacy/privacy-policy>.

If you disclose data to us about other individuals (for example colleagues), you are responsible for ensuring that you are authorized to do so and that those individuals have been informed about this Privacy Notice. You must not submit patient-identifiable information, protected health information, human genetic information, health data, biometric data or other sensitive information in prompts to IPA Investigator. IPA Investigator is not authorized or designed to receive such information, and QIAGEN does not represent IPA Investigator as HIPAA-compliant for protected health information.

This Privacy Notice is aligned with the EU General Data Protection Regulation («GDPR»), UK General Data Protection Regulation («UK GDPR»), the Swiss Data Protection Act («Swiss DPA»), and applicable Canadian privacy laws. Where IPA Investigator is accessible to residents of US states with comprehensive privacy laws (such as California under the CCPA/CPRA), additional disclosures and rights described in Section 10 may apply.

Certain additional disclosures or rights may apply depending on your location. The application of these laws depends on each individual case. Where local data protection

laws and other mandatory laws in other jurisdictions impose stricter or additional requirements, those local laws shall prevail.

2. Who is the controller for processing your data?

QIAGEN GmbH, QIAGEN Str. 1, 40724 Hilden, Germany («QIAGEN GmbH»), is the main controller with respect to the account, technical, usage, feedback and security data described in Section 3, which are collected and processed through or in connection with IPA Investigator and related systems insofar as operated for QIAGEN, except for query content, for which the roles are set out below. To the extent QIAGEN processes customer content in IPA on behalf of a customer, including data that may be contained in IPA analyses or outputs, QIAGEN acts as processor or service provider under the applicable agreement and data processing terms, and the customer remains responsible for the underlying legal basis and notices for such content.

Where you access IPA Investigator through IPA that is licensed to your organization, the content of your queries constitutes customer content. In that case QIAGEN acts as processor or service provider for such query content, processing it on your organization's documented instructions and under the data processing terms agreed with it, while your organization remains responsible for the applicable legal basis and notices. QIAGEN acts as controller for the account, technical, usage, feedback and security data described in Section 3, which it processes to provide, secure and improve IPA Investigator. Your primary point of contact for data protection concerns and to exercise your rights under Section 10 is as follows:

QIAGEN GmbH
QIAGEN Str. 1
40724 Hilden
Germany
Tel.: +492103290
E-mail: dataprotection@qiagen.com
Contact Data Protection Officer: dataprotectionofficer@qiagen.com

3. What data do we process?

We process various categories of data about you in connection with IPA Investigator, including current but also previous versions where information changes over time. The main categories of data are the following:

- **Agent Queries:** Queries that you submit to IPA Investigator are automatically processed by AI to generate IPA Investigator's responses. IPA Investigator is not designed to be used for entering personal data, patient-identifiable information, protected health information, human genetic information, health data, biometric data or other sensitive information in your queries, and you must not submit such information. When generating a response, IPA Investigator provides the AI service with the text of your query and relevant IPA-related context needed to answer it,

but not your account identity, user ID or persistent conversation history. From the AI service's perspective, you are not identified as an individual user. Your queries are processed to generate a response during your session and are not retained as a persistent conversation history after the session ends. When a new question or session starts, IPA Investigator does not make prior conversations available to the AI service. QIAGEN may retain limited overall usage statistics, such as the number of queries submitted or tokens processed, as described under Usage data below, but such usage statistics do not include the text of your prompts or IPA Investigator's responses.

- **Technical data:** When you use IPA Investigator, through IPA, IPA processes account, authentication and session-related data necessary to manage access, maintain the session, ensure security and keep appropriate audit records. Once you are authenticated, IPA creates a unique session identifier that associates activity during that session with the session identifier until you log out or the session times out, for example after a period of inactivity. IPA also retains records of user logins and audit logs of key user actions independently of IPA Investigator. IPA Investigator does not use cookies or device identifiers for this purpose. Any IPA Investigator-specific technical or usage logging is limited to what is necessary to operate, secure and troubleshoot the service and does not include the text of your prompts or IPA Investigator's responses, unless separately stated in this Privacy Notice. Technical, session, and audit data are retained in accordance with IPA's applicable retention periods.
- **Registration data:** IPA Investigator is made available to authorized IPA users and requires IPA access rights. Access to IPA Investigator is managed through the IPA account and authentication framework. Registration and account data are processed as part of IPA access management and are not transmitted to the AI service for the purpose of generating IPA Investigator's responses. For more information on how we collect and process registration and account data, please see the relevant section in our general Privacy Policy <https://www.qiagen.com/us/privacy/privacy-policy>.
- **Usage data:** We collect limited overall usage statistics relating to IPA Investigator, such as the number of queries submitted, tokens processed, features used, timestamps and acknowledgement of the IPA Investigator disclaimer. Usage data does not include the text of your prompts or IPA Investigator's responses. This data helps us to understand usage behavior, ensure functionality and security, optimize product development, and improve IPA Investigator's functionality and user experience. Usage data is retained for up to 12 months from the date of collection.
- **Feedback data:** If you provide feedback or participate in surveys, we collect the information you submit to improve our offering. Feedback data is typically not linked to your identity unless you voluntarily provide contact details. We generally retain feedback data for 12 months from the last interaction.

- **Other data:** We may also collect additional data in specific situations related to your use of IPA Investigator. For example, we may process data necessary to comply with administrative or legal obligations, such as maintaining documentation for regulatory compliance. If you contact our support team or participate in user research, we may collect and process your communications, feedback, or survey responses, which may include personal data. For the purposes of system security and integrity, we may process log and audit data, such as records of access, error logs, and security events, to the extent such data is generated by IPA or IPA Investigator-related systems. In rare cases, we may process data as necessary to respond to legal requests from authorities or to protect our rights and interests. The retention period for this data depends on its purpose and is limited to what is necessary: typically, compliance documentation is kept for up to 5 years, support and communication data for 12 months after resolution, and log and audit data for 12 months. Data processed for legal obligations may be retained as required by law or until the relevant matter is resolved.

Much of the data described in this Section 3 is provided to us directly by you, for example when you access IPA Investigator through IPA, submit a query, or interact with our support services. You are generally not obliged to disclose data to us, except in specific cases where legal obligations require it. However, if you wish to use IPA Investigator, you will need to provide IPA account, authentication and session-related data necessary to provide and secure access. The processing of certain technical, session, and security data is unavoidable when using IPA Investigator to ensure its functionality and security. If you contact support or participate in user research, you may also provide us with communications or feedback data.

4. How and for what purposes do we process your data?

We process your data to provide, maintain, secure, and improve IPA Investigator and its features. This includes communicating with you, for example, responding to your inquiries, providing support, and assisting you in exercising your rights (see Section 10). For these purposes, we use communication and registration data (if applicable), which we retain to document our interactions, ensure quality assurance, and manage follow-up requests. We also process technical, session, and usage data to ensure the functionality, security, and optimization of IPA Investigator, to record disclaimer acknowledgement, and to monitor misuse or technical issues. Additionally, we use limited overall usage statistics on an aggregated basis for internal statistical analysis and service development to further enhance IPA Investigator. Data may also be processed to comply with legal obligations, orders and requests, and recommendations from authorities, to fulfill internal administrative requirements, and to protect our rights and interests. Where required, we process your data for security and access control purposes. When you submit a query, the query and relevant IPA-related context are processed for the purpose of generating IPA Investigator's response, but QIAGEN does not use the text of your prompts or IPA Investigator's responses for general usage analytics, user profiling or AI training.

IPA Investigator is built on large language model (LLM) technology. The information below is intended to explain how AI processing is used in IPA Investigator and how this may affect you.

How IPA Investigator works: When you submit a query, the text of your query, together with relevant contextual information (relevant IPA-related context needed to answer it), is processed for the sole purpose of generating a response. IPA Investigator is designed so that your account identity is not transmitted to the LLM service as part of generating a response. The LLM service does not receive a persistent conversation history across separate sessions or questions. Any personal data that you choose to include in a query will, however, be sent to and processed by the LLM service as part of that query in order to generate the response. You are informed at the start of each IPA Investigator interaction that you are interacting with an AI system. In line with applicable transparency requirements, including the EU AI Act, QIAGEN is implementing technical measures to mark IPA Investigator's AI-generated content in a machine-readable format and to make it detectable as artificially generated.

Profiling and automated decision-making: IPA Investigator is not designed to profile users for marketing, eligibility, pricing, access or similar purposes. IPA Investigator does not make solely automated decisions producing legal or similarly significant effects within the meaning of Article 22(1) GDPR. IPA Investigator outputs remain subject to human review and independent verification.

Use of data for AI training: QIAGEN has contractually restricted its AI service providers, currently including Microsoft Azure OpenAI Service, from using your queries or the content of your interactions with IPA Investigator to train their general-purpose AI models. QIAGEN does not use your prompts, IPA Investigator responses or customer content submitted through IPA Investigator to train or fine-tune any AI model, whether a general-purpose model or a model specific to IPA Investigator, and does not use them to create training datasets, embeddings or retrieval indexes for such purposes. Any configuration, improvement, monitoring or adjustment of AI services performed for QIAGEN is subject to contractual safeguards, access controls and applicable data protection requirements.

Human oversight and your rights: IPA Investigator is designed to support, not replace, human interaction, independent scientific judgment, professional review, validation or decision-making. You may contact a human QIAGEN representative using the channels listed in Section 2 if you are dissatisfied with a response generated by IPA Investigator, if you wish to obtain clarification, or if you would like human review of an output. You also have the right to express your point of view and to contest any output generated by IPA Investigator. There is a button provided in the IPA Investigator panel in the IPA user interface to submit feedback about the agent that you may use if desired.

Limitations of AI output: AI-generated responses may contain errors, omissions, or outdated information. IPA Investigator is intended as an IPA-related research and support tool only. IPA Investigator is intended for Research Use Only. Not for use in diagnostic procedures. IPA Investigator does not provide professional, legal, medical, diagnostic,

clinical, regulatory, financial or other expert advice, does not interpret clinical test results, and does not replace independent professional review, validation or decision-making. You should independently verify any critical information using authoritative sources, such as official QIAGEN documentation, product labelling, peer-reviewed literature, or QIAGEN technical support.

5. On what basis do we process your data?

We process your personal data in accordance with applicable data protection laws. The specific legal basis for processing depends on the context and purpose of the processing activity, and the legal framework in your jurisdiction:

- **Consent:** Where we ask for your consent for a specific optional processing activity, we will inform you separately about the relevant processing purpose and how you may withdraw your consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent prior to its withdrawal.
- **Legitimate Interest:** Where consent is not required and we do not ask for your consent, the processing of your personal data relies on the basis of processing on our or a third-party legitimate interest in the particular processing operation, particularly to pursue the objectives and purposes set out in Section 4 and to implement related measures. This includes our interest in providing, maintaining, securing, and improving IPA Investigator and its features, as well as ensuring the functionality, security and optimization of IPA Investigator, conducting internal statistical analysis, and service and product development to further enhance IPA Investigator. This also includes complying with legal regulations where compliance is not a legal basis under applicable data protection laws (e.g., the laws in the European Economic Area [EEA], the United Kingdom, and Switzerland). You have the right to object to processing based on legitimate interests at any time on grounds relating to your particular situation (see Section 10). On request, we will provide further information about our balancing assessment. The legitimate interest basis described in this section applies to the account, technical, usage, feedback and security data for which QIAGEN acts as controller. Query content is processed as set out in Section 2.
- **Initiation or Performance of a Contract:** Where you access IPA Investigator through IPA or enter into a contract with us, to the extent permitted by applicable law, we process your personal data on the basis of the necessity for the performance of a contract or to take steps at the request of the user prior to entering into a contract, particularly to communicate with you (e.g., responding to your inquiries, providing support) and perform our contract with you or the customer organization through which you access IPA.
- **Legal Obligation:** We may also process your data to comply with legal or regulatory requirements, such as responding to lawful requests from authorities or fulfilling internal administrative or compliance obligations.

6. In the context of IPA Investigator and related processes, we may disclose your personal data to third parties, in particular to the following categories of recipients:

- **QIAGEN group entities:** When you use IPA Investigator and its related services, depending on the circumstances, we share your registration data, usage data, feedback data and other data with other QIAGEN group entities where necessary for service operation, administration, security, support, compliance or customer management. A list of our group entities can be found here: <https://www.qiagen.com/us/about-us/our-global-presence>. The QIAGEN group entities may process your data for the same purposes as provided in Section 4 of this Privacy Notice.
- **Service Providers:** We work with service providers in the EEA, the United Kingdom, Switzerland, the USA and other countries who process your data on our behalf or otherwise support the operation, security and availability of IPA and IPA Investigator. The service providers used for IPA Investigator include Microsoft Azure OpenAI Service and may include other cloud, hosting, security, logging, monitoring, diagnostics and support providers used to operate, secure or support IPA and IPA Investigator. When you submit a query, the query text and relevant IPA-related context are processed by the AI service provider for the purpose of generating IPA Investigator's response. QIAGEN does not collect or share the text of your prompts or IPA Investigator's responses as usage statistics, analytics datasets or AI training data. Where human access is necessary, for example for support requested by a user, troubleshooting, security review, legal compliance or incident response, access is restricted to authorized personnel on a need-to-know basis and subject to confidentiality and security controls.
- **Authorities:** We may disclose personal data to agencies, courts and other authorities in the EEA, the UK, Switzerland and other countries if we are legally obliged or entitled to make such disclosures or if it appears necessary to protect our or third-party interests.
- **Legal advisors:** We may also disclose personal data to lawyers and legal advisors in order to obtain advice and legal services.
- **Other persons:** This refers to cases where interactions with third parties follow from the purposes set out in Section 4. Where these other persons determine the purposes and means of the processing and process your data for their own purposes, they act as separate controllers.

All these categories of recipients may involve third parties, so that your data may also be disclosed to them. We can restrict the processing by certain third parties (for example, service providers), but not by others (for example, public authorities).

7. Is your personal data disclosed abroad?

As explained in Section 6, we disclose data to third parties. Not all of these parties are located in the EEA, the UK, Canada or Switzerland. Therefore, your data may be processed in Europe and in the USA, and in principle, in the additional locations of the service providers we use. Accordingly, your personal data may be subject to the law of foreign jurisdictions, including any law permitting or requiring disclosure of the data to the government, government agencies, courts and law enforcement in that jurisdiction.

If a recipient is located in a country without adequate statutory data protection, we take steps to ensure the information will receive adequate protection. This may include requiring the recipient to undertake to comply with data protection, for this purpose we use the European Commission's Standard Contractual Clauses with local adaptations where necessary, supported where appropriate by transfer impact assessments and supplementary measures. Where a recipient is certified under the EU-US Data Privacy Framework (DPF), the UK Extension to the EU-US DPF or the Swiss-US DPF, we may also rely on that certification where applicable, but we do not treat such certification as the only transfer mechanism where additional safeguards are required or appropriate. For transfers from the UK, we rely on UK adequacy regulations or UK International Data Transfer Agreements (IDTAs) or the UK Addendum to EU Standard Contractual Clauses.

In some jurisdictions, local laws may restrict or prohibit the cross-border transfer of certain categories of personal data. Where such restrictions apply, you should ensure that you do not provide personal data, patient-identifiable information, protected health information, human genetic information, health data, biometric data or other sensitive information through IPA Investigator unless the applicable legal requirements for such transfer and processing have been met.

Please note that data exchanged via the internet is often routed through third countries. Your data may therefore be sent abroad even if the sender and recipient are in the same country.

8. How long do we process your data?

We process your data for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence require it or storage is a technical requirement. You will find further information on the respective storage and processing periods for the individual data categories in Section 3. If there are no contrary legal or contractual obligations, we will delete or anonymize (where permitted) your data once the storage or processing period has expired as part of our usual processes.

9. How do we protect your data?

We take appropriate security measures in order to maintain the required security of your personal data and ensure its confidentiality, integrity and availability, and to protect it

against unauthorized or unlawful processing, and to mitigate the risk of loss, accidental alteration, unauthorized disclosure or access.

Depending on the processing activity and the sensitivity of the data, our technical and organizational security measures may include encryption, pseudonymization where appropriate, logging, access restrictions, role-based access controls, tenant or customer data separation, instructions to our employees, confidentiality agreements, and monitoring. Specifically, we take appropriate organizational measures to ensure that our employees have access to your data on a need-to-know basis, to the extent necessary for the purposes described in this Privacy Notice and the activities of the employees concerned. Our employees act in accordance with our instructions and are bound to confidentiality and discretion when processing your data.

Although we take steps to protect personal data transmitted electronically, please be aware that the transmission of information via the internet is not completely secure, and despite our efforts to protect your personal data, we cannot guarantee absolute security of data transmitted through IPA Investigator or over the internet. Any such transmission is at your own risk.

10. What are your rights?

To help you control the processing of your personal data, you have the following rights in relation to our data processing, depending on the applicable data protection law:

- The right to request information from us as to whether and what data we process from you, and how that information has been used and disclosed;
- The right to obtain access to your personal data under our control;
- The right to have us correct data if it is inaccurate;
- The right to request erasure of data;
- The right to restriction of processing in defined circumstances;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- The right to withdraw consent, where our processing is based on your consent;
- The right to receive, upon request, further information that is helpful for the exercise of these rights;
- The right to object to processing based on legitimate interests on grounds relating to your particular situation;
- You also have these rights with respect to other parties that cooperate with us as separate controllers. We may ask you to contact them directly if you wish to exercise your rights in relation with their processing. Where your request relates to customer content for which QIAGEN acts as processor, we may ask you to contact the relevant customer organization directly or may refer the request to that customer. You will find information on our service providers in Section 6.

Additional or different rights may apply under your local law. For example, residents of California (CCPA/CPRA), Virginia, Colorado, Connecticut, and other US states with

comprehensive privacy laws may have rights to: (i) know/access; (ii) delete; (iii) correct; (iv) opt out of the sale or sharing of personal information; (v) opt out of targeted advertising; (vi) limit the use of sensitive personal information; (vii) appeal a denial of a rights request; and (viii) non-discrimination for exercising rights. QIAGEN does not sell your personal information, as sale is defined under the CCPA, and does not share it for cross-context behavioral advertising. Where required by applicable law, we honor Global Privacy Control (GPC) signals as a valid opt-out request.

Please note that conditions, exceptions or restrictions apply to these rights under applicable data protection law (for example to protect third parties). We will inform you accordingly where applicable.

If you do not agree with the way we handle your rights or with our data protection practices, please let us know. If you are located in the EEA, the United Kingdom or in Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority within in your country.

- You can find a list of authorities in the EEA here:
https://edpb.europa.eu/about-edpb/board/members_en
- You can reach the UK supervisory authority here:
<https://ico.org.uk/global/contact-us/>
- You can find the appropriate authorities in Canada here:
https://www.priv.gc.ca/en/report-a-concern/leg_info_201405/
- You can reach the Swiss supervisory authority here:
<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

11. Technical and session-related processing

IPA Investigator is made available through IPA, and access to IPA Investigator is managed through IPA's account, authentication and session framework. IPA may process session-related information necessary to authenticate users, maintain an active session, record disclaimer acknowledgement, ensure security, and maintain appropriate audit records. These session-related processes are technically necessary for IPA Investigator to function.

12. Can we update this Privacy Notice?

We can change this Privacy Notice at any time. The version published or made available for IPA Investigator is the current version. Where required by law, we will notify you of changes to this Privacy Notice or seek your renewed consent to process your personal data.

Last updated: 24.07.2026