

Privacy standards and compliance with Illumina Connected Software

Frequently asked questions



What does Illumina do to make sure its software complies with the General Data Protection Regulation (GDPR)?

The GDPR does not prohibit the use of the cloud-based services for the processing of health data, but it imposes certain requirements. The Illumina Connected Software portfolio is designed to meet these requirements with features such as:

- An internal privacy program designed to make sure that the principles of the GDPR are followed
- A [data processing addendum](#) for customers that is aligned with the GDPR mandatory requirements
- Industry standard technical and organizational measures designed to protect personal data from unauthorized processing in accordance with GDPR requirements

What security and privacy standards and measures does Illumina have in place for Connected Software?

Illumina applies industry-standard security measures, such as maintaining an ISO 27001 (security) and ISO 27701 (privacy) compliance program. In practice, this entails applying access controls, encryption, and physical security controls, among other measures.

- ISO 27001 certifies the Illumina information security management system (ISMS). The standard specifies the requirements for establishing, implementing, operating, monitoring, reviewing, maintaining, and improving a documented ISMS within the context of the organization's overall business risks.
- ISO 27701 is a global privacy standard that requires the documentation of policies, procedures, and protocols demonstrating that a company applies high standards of data protection to personally identifiable information (PII) through its privacy information management system (PIMS).



Illumina ISO 27001 and 27701 certifications can be accessed [here](#).

I want to keep my data stored in my jurisdiction. How can I control where my data is stored in the cloud?

Customers can choose the data center in which their data will be processed, enabling them to designate a specific region in which their data is hosted and maintained, eg, within the European Union (EU). Data center availability is product-specific and dependent upon customer request. Refer to relevant cloud-based product data sheets and security briefs for more information.

Does Illumina provide support services from an outside country (ie, outside of the EU)?

When providing technical support, in limited circumstances (eg, escalations that can only be handled by specific teams or in cases of out-of-hours support), Illumina may need to access personal data stored within a particular region from another country to make sure that high levels of performance and security can be continuously maintained. The full list of sub-processors for Technical Support and Maintenance Services can be found [here](#).

How does Illumina ensure any international transfers of personal data from the EU and UK to other jurisdictions are lawful?


Illumina offers customers the Standard Contractual Clauses and the United Kingdom (UK) international data transfer agreement (IDTA), which are approved by the EU Commission and UK Information Commissioner, respectively. These terms are incorporated by reference into the data processing addendum that governs the provision of Illumina Cloud Services to customers. As part of our commitment to privacy, Illumina has also submitted an application to have "Binding Corporate Rules" that, once approved, would provide a further basis for the transfer of personal data by Illumina from the EU to other jurisdictions.

What has Illumina done to comply with the Schrems II ruling?

In response to the decision made by the Court of Justice of the European Union (CJEU) as part of the Schrems II case, which declared that the EU-US Privacy Shield Decision was invalid, Illumina has carried out assessments of the laws and practices in the countries where it processes personal data and has determined that transferring data to those countries does not undermine the level of protection set out in the Standard Contractual Clauses.

Is Illumina certified under the EU-US Data Privacy Framework (EU-US DPF)?

Yes, Illumina has also certified to the US Department of Commerce that it complies with the EU-US DPF, and adheres to the EU-US DPF Principles with regards to the collection, use, and retention of personal data transferred from the European Union to the United States.

 To learn more about the Data Privacy Framework, and to view our certification, visit [here](#) (search "Illumina" to access full profile).

What subprocessors are used to provide Illumina software solutions on the cloud? How does Illumina manage its relationship with its subprocessors?

Illumina engages with various strategic partners to support Cloud Services, including cloud providers such as Amazon Web Services (AWS). Subprocessors are heavily vetted, routed through an internal due diligence process, and subject to contractual obligations that are substantially similar to those set out in the Illumina [data processing addendum](#). The full list of sub-processors for Cloud Services can be found [here](#).

Does Illumina disclose genomic information to U.S. and international law enforcement agencies?

Under U.S. law (in particular the CLOUD Act), any cloud service provider, whether based in the U.S. or otherwise, can be subject to U.S. jurisdiction and be required to comply with U.S. law enforcement requests. The GDPR does not prevent this - there are provisions of the GDPR that permit compliance with the CLOUD Act. Nevertheless, Illumina publishes an annual Transparency Report, which discloses the number of requests for genomic information that Illumina has received from U.S. and international law enforcement agencies each year. Since our first Transparency Report in 2020 until our most recent report in 2022 (covering the fiscal year ending January 3, 2023 and available [here](#)), Illumina has not reported a law enforcement request for such data.

Illumina has a Public Authority Data Access Procedure that sets out the Illumina procedure for responding to:

- A request from a law enforcement, regulatory, judicial, or other government or public authority (a "Public Authority") to disclose any personal information; or
- Any request or attempt by a Public Authority to gain direct access to any personal information.

Learn more

[Illumina Connected Software](#)

[Privacy standards and compliance with Illumina Connected Software technical note](#)



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