



APERTURE RESEARCH
WORKS

INDEPENDENT PUBLIC-SOURCE CASE STUDY | NOT A CLIENT ENGAGEMENT

23andMe: What Did the Privacy Promise Actually Support?

Quick Evidence Check | Complete Case Pack

Evidence cut-off: 21 August 2026

Complete case-pack production: V1.0 | 23 August 2026

Package status: APPROVED FINAL PUBLIC EDITION

Human-approved for public release by Paul Hattingh on 23 August 2026. Evidence limitations and future review triggers remain controlling.

APPROVED FINAL PUBLIC EDITION

Aperture Research Works did not act for the subject or any other party in this public-source demonstration. The work is designed to show how evidence is tested before reliance. Proprietary internal prompts, scoring logic, QA architecture and protected working records are not published.

REALITY BEFORE RELIANCE.
VERIFICATION BEFORE INTERPRETATION.
EVIDENCE BEFORE NARRATIVE.

Document control and reliance boundary

Public brand	Aperture Research Works
Document	Complete Case Pack (CCP)
Product / capability	Quick Evidence Check
Operating mode	Independent Public-Source Case Study - Not a Client Engagement
Governing master	PHW Research AI v11.0
Evidence cut-off	21 August 2026
Research status	Research Complete / Approved
Public edition status	APPROVED FINAL PUBLIC EDITION
Professional boundary	Not legal advice and not a full investigation of the 2023 cybersecurity incident or every customer right.
Document version	1.0
PDF production date	23 August 2026
Human approval of exact PDF	Paul Hattingh 23 August 2026 Approved for public release
Release-date current-status check	Release-date current-status check completed 23 August 2026. The bankruptcy matter remains active administratively, with a claims hearing scheduled for 25 August 2026, but no material official development was identified that changes the narrow privacy-transfer finding or Source Freeze SF1.

PACKAGE CONTENTS

1. Document 1 - Principal Investigative Dossier
2. Document 2 - Claims-and-Evidence Matrix
3. Document 3 - Master Chronology
4. Document 4 - Source and Evidence Register
5. Document 5 - Public Portfolio Edition
6. Document 6 - Final Delivery Manifest

The combined case pack follows the controlled document sequence. A Specialist Appendix is omitted unless it adds a distinct professional function and the required competence boundary can be stated accurately.



DOCUMENT 1

PRINCIPAL INVESTIGATIVE DOSSIER

23andMe: What Did the Privacy Promise Actually Support? | Quick Evidence Check

Quick Evidence Check

Illustrative product level: US\$750 fixed

Matter reference: APERTURE-SAMPLE-2026-001

Evidence Cut-off: 21 August 2026

Source Freeze: SF1, 21 August 2026

Research status: Research Complete / Approved

Text version: 1.1

INDEPENDENT PUBLIC-SOURCE CASE STUDY - NOT A CLIENT ENGAGEMENT

Aperture Research Works did not represent 23andMe, TTAM Research Institute, any customer, creditor, regulator, state authority or other party. Aperture did not have access to confidential evidence. This assessment is limited to lawfully available public sources reviewed through the stated Evidence Cut-off.

Source IDs in square brackets refer to the Short Source Schedule.

MATTER OVERVIEW

23andMe entered Chapter 11 proceedings in March 2025 while holding highly sensitive customer information, including genetic information. The bankruptcy created a practical reliance question that could not responsibly be answered by headlines alone: what did 23andMe's own privacy wording actually support if customer information changed hands through a sale of the business? [S01][S02]

This Quick Evidence Check examines one narrow representation and the principal official evidence needed to test it. It does not reconstruct the entire bankruptcy, determine every customer's legal rights, assess the separate 2023 cybersecurity

incident, or provide a legal opinion. Its purpose is to show what a tightly defined evidence-assurance product can establish, what qualification remains material, and when a broader review would be required.

MATTER AT A GLANCE

Subject: 23andMe privacy representation in the 2025 bankruptcy-sale context

Primary period: March to July 2025

Historical context: Privacy-policy wording from 2007 where necessary to test the 2025 representation

Current-status check: Through 21 August 2026

Primary forum: U.S. Bankruptcy Court for the Eastern District of Missouri, with relevant state privacy objections noted

Product: Quick Evidence Check

Client-facing finding: **SUPPORTED WITH MATERIAL QUALIFICATION**

Factual Status: **CORROBORATED**

Evidential Confidence: **HIGH**

Reliance Status: **LIMITED RELIANCE ONLY**

Overall conclusion classification: **STRONGLY SUPPORTED** within the defined limited scope

CENTRAL QUESTION

Did 23andMe's Privacy Statement in force when it entered bankruptcy provide sufficient factual support for a customer to conclude that existing privacy protections would continue to bind a purchaser if customer data changed ownership through bankruptcy, and what material qualification remained?

DECISION OR RELIANCE QUESTION

Could a reasonable user of the public record responsibly rely on the petition-date Privacy Statement alone to understand what would happen to personal and genetic information in a bankruptcy sale, or was additional verification materially necessary?

SCOPE

This check examined:

- the petition-date privacy representation concerning bankruptcy and change-of-control transfer;
- the Bankruptcy Court's treatment of the relevant policy wording and its historical development;
- the Federal Trade Commission's public position on continuity of privacy promises;
- material state objections relevant to customer consent and genetic-data protections;
- transaction-specific privacy safeguards associated with the TTAM sale; and
- limited current evidence showing how the successor organisation addressed transfer wording and privacy governance after the transaction.

This check did **not** examine:

- the merits of the 2023 data breach, except where necessary to distinguish it from the bankruptcy question;
- individual customer consent histories;
- the full legal effect of California or other state genetic-privacy statutes;
- scientific or medical issues;
- cybersecurity architecture or digital-forensic evidence;
- the complete Chapter 11 restructuring;
- valuation, investment merit or securities advice; or
- whether every later safeguard was operationally effective in practice.

LIMITED-SCOPE CONTROL RECORD

Research period: 21 August 2026, including the final pre-approval current-status check on that date.

Restricted source set: The core public-facing analysis relies on S01-S08, selected because they directly address the Central Question. Two additional current-context sources in the frozen internal register were not used to expand the Central Question. No paid database, confidential evidence, customer-level genetic or medical data, or complete appellate docket review formed part of this Quick Evidence Check.

Work not performed: No full Chapter 11 reconstruction, customer-specific consent analysis, state-by-state privacy-law opinion, cybersecurity forensic examination, valuation, investment analysis, scientific review or operational audit of all successor safeguards was performed.

Registers not created for this limited product: No separate full source-dependence register, entity-relationship register, calculations register, exhibits register or right-of-reply register was created. Material qualification and contrary evidence were instead controlled in the frozen Claims Matrix, Source Register, Evidence Gaps record and Controlled Research Record.

External reviews not performed: No external Legal Review, Specialist Review or Independent Review was performed because none is required to state the narrow factual finding. Such review would be required if the scope were expanded to customer-specific rights, statutory compliance, enforceability or litigation strategy.

Permitted use: Public portfolio demonstration of a Quick Evidence Check and limited factual understanding of the defined representation. It is not a substitute for matter-specific advice or a broader engagement.

Reliance restriction: Limited Reliance Only, within the Central Question, Evidence Cut-off and stated exclusions.

WHAT 23ANDME'S PRIVACY WORDING SUPPORTED

The petition-date Privacy Statement expressly contemplated that personal information could be accessed, sold or transferred as part of a bankruptcy, merger, acquisition, reorganisation or sale of assets. It also stated that the Privacy Statement would continue to apply to transferred personal information. [S01][S02]

That was not merely a position developed after Chapter 11 began. The Bankruptcy Court examined earlier versions of the company's privacy wording and recorded that, since 2007, every version had contained language alerting customers that personal information could transfer in connection with a merger, acquisition or asset sale, with the Privacy Statement applying to the successor or purchaser. The Court also concluded that the 2022 addition of the word "bankruptcy" did not materially enhance 23andMe's rights or impair customer rights. [S01, pp. 3 and 15]

On that narrow factual issue, the representation had real documentary support.

WHY THE CLAUSE WAS NOT THE WHOLE ANSWER

The existence of supporting language did not eliminate the need for further verification.

The Federal Trade Commission emphasised that 23andMe's privacy promises remained material in any bankruptcy-related transfer and stated that a purchaser should be bound by the relevant privacy policies and applicable law. [S02, pp. 1-3]

The court-appointed Consumer Privacy Ombudsman and objecting states raised additional issues concerning historical privacy policies, notice, consent, state-specific protections and the treatment of genetic information. The Ombudsman was unable to conclude with certainty that the proposed sale was consistent with the full privacy-policy record and identified state genetic-privacy laws requiring express consent in some circumstances. A multistate objection separately argued that customer genetic information should not transfer without the required consent. [S01, pp. 6-7][S05]

The Bankruptcy Court ultimately approved the transaction and rejected the principal objections within the bankruptcy framework. That judicial outcome is material. Equally material is the fact that the transaction included additional privacy safeguards rather than relying only on the existing Privacy Statement. [S01, pp. 5-7 and 37]

Those safeguards included continuing deletion and research opt-out rights, customer notice, restrictions on future transfers of genetic information, privacy procedures and reporting, identity-theft monitoring and establishment of a Privacy Advisory Board. [S01, pp. 5-6][S04]

THE MATERIAL QUALIFICATION

The strongest evidence does **not** support a finding that 23andMe's bankruptcy-transfer representation was false. [S01][S02]

It supports a narrower and more useful conclusion: the representation was genuine, but the clause alone did not resolve the entire privacy position for every customer. [S01]

A reader relying only on the sentence that privacy protections would continue after a transfer could miss material issues concerning:

- which historical policy version applied to a particular customer;
- how changes to the policy had been notified;
- whether additional consent requirements arose under particular state laws;
- the distinction between a policy representation and a complete legal conclusion;
- additional conditions negotiated into the transaction; and
- unresolved appellate or state-law questions outside the narrow factual issue examined here. [S01][S05][S06]

This distinction matters because a statement may be accurate without being sufficient for the decision a person intends to make from it.

CURRENT IMPLEMENTATION INDICATORS

The current 23andMe Privacy Statement, last updated 19 May 2026, retains the change-of-ownership clause. It also states that genetic data will not be sold or transferred in a future merger, acquisition, bankruptcy, reorganisation or asset sale unless the recipient falls within specified U.S. recipient categories, satisfies the stated legal requirements and agrees to adopt the Privacy Statement. [S07, Data Sharing section]

23andMe Research Institute publicly announced formation of a Privacy Advisory Board on 30 October 2025, and the Board remains identified in the organisation's current governance material. [S08]

These are observable implementation indicators. They do not establish that every promised safeguard has been independently audited or that every customer-specific legal issue has been resolved.

California's Attorney General described the State's separate challenge to the bankruptcy sale as pending in its 28 May 2026 public statement. A fresh official-status search through the Evidence Cut-off identified no later official California source resolving that challenge. The unresolved status is therefore retained as a caveat, not treated as proof that the challenge will succeed. [S06]

APERTURE FINDING

SUPPORTED WITH MATERIAL QUALIFICATION

Factual Status: CORROBORATED

Evidential Confidence: HIGH

Reliance Status: LIMITED RELIANCE ONLY

The petition-date Privacy Statement provided genuine documentary support for the proposition that personal information could transfer in a bankruptcy or other change-of-control transaction while remaining subject to the Privacy Statement. [S01][S02]

However, responsible reliance on that clause alone was insufficient to establish the complete privacy position for every customer. Historical policy wording, notice and consent, state-specific protections, official objections and transaction-specific safeguards were material to the decision context. [S01][S05]

The evidence therefore supports the representation in its narrow factual sense, but does not support treating it as a complete answer to all customer-consent or state-law questions.

RELIANCE ASSESSMENT

Reliance Status: LIMITED RELIANCE ONLY.

This public portfolio sample is not advice and should not substitute for a matter-specific engagement. Within the defined question, the evidence supports limited factual reliance on the following propositions:

1. the petition-date Privacy Statement contemplated transfer in bankruptcy or change of control; [S01][S02]
2. it stated that the Privacy Statement would continue to apply to transferred information; [S01][S02]
3. the Bankruptcy Court treated the historical policy record as consistent with that transfer concept and approved the transaction; [S01]
4. material privacy qualifications and additional safeguards remained relevant. [S01][S04][S05]

This check does **not** support a conclusion that:

- every individual customer's consent rights were identical;
- every historical policy amendment was legally effective for every customer;
- the transfer complied with every potentially applicable state genetic-privacy statute;
- every TTAM privacy safeguard was fully implemented and effective; or
- all appeals or related state-law challenges have been finally resolved.

LARGEST EVIDENCE GAP

The largest gap is the absence of a publicly determinable customer-by-customer record showing which historical policy version, notice mechanism and consent history applied to every pre-2022 customer. [S01]

That gap does not defeat the limited factual finding in this Quick Evidence Check. It would become material if the decision required a legal conclusion concerning a particular customer or class of customers.

A second current-status limitation remains: a final merits disposition of California's bankruptcy-sale challenge was not identified in the official public sources reviewed through the Evidence Cut-off. [S06]

WHAT COULD CHANGE THE CONCLUSION

The limited conclusion should be reassessed if any of the following occurs:

- a later appellate or controlling ruling materially reverses or limits the Bankruptcy Court's interpretation;
- primary evidence establishes that the petition-date policy did not govern a material customer category;
- evidence shows that a safeguard material to the narrow finding was rescinded or not implemented; or
- a controlling legal ruling determines that the relevant transfer clause was ineffective for the customer group under consideration.

RECOMMENDED NEXT STEP

Where the decision requires only a narrow factual check of what the public representation supported, this Quick Evidence Check provides a defined, source-traceable answer within the stated reliance limits.

Where the decision concerns a particular customer's rights, litigation strategy, regulatory compliance, a transaction involving genetic-data obligations, or another high-consequence legal use, the appropriate next step is a broader evidence review together with qualified legal review in the relevant jurisdiction.



PROFESSIONAL BOUNDARY

This product is an evidence-assurance assessment. It is not legal advice, legal representation, a privacy-law opinion, a cybersecurity forensic examination, a statutory audit, an investment recommendation or a medical opinion. No conclusion is expressed on the legal rights of any specific customer.

SHORT SOURCE SCHEDULE

S01. U.S. Bankruptcy Court, Eastern District of Missouri, 27 June 2025.

In re 23andMe Holding Co., Case No. 25-40976-357, Memorandum Opinion.

Principal locators: pp. 3-7, 15 and 37. Used for policy history, petition-date wording, Ombudsman and state objections, TTAM safeguards, the Court's interpretation and transaction approval. The opinion is not treated as a universal state-law privacy opinion.

S02. Federal Trade Commission, 31 March 2025.

Chairman Andrew N. Ferguson letter regarding the 23andMe bankruptcy.

Principal locators: pp. 1-3, particularly pp. 2-3. Used for the FTC's official position on the continuity of privacy promises and purchaser adherence. It is a regulator position, not an adjudication of customer-specific state-law rights.

S03. 23andMe Holding Co., 26 March 2025.

Company statement that potential buyers would be required to comply with the privacy policy and applicable law. Used only as a primary-party representation, not independent corroboration.

S04. 23andMe Holding Co., 13 June 2025.

23andMe Reaches Agreement for Sale of Business to TTAM Research Institute Following Final Round of Bidding in Court-Approved Sale Process.

Principal locator: numbered privacy safeguards 1-7. Used for the announced \$305 million transaction and additional privacy commitments. Read together with S01 because it is an interested-party source.

S05. Multistate Attorneys General, 9 June 2025.

Objection to the Debtors' Proposed Sale of Customers' Assets, In re 23andMe Holding Co., Docket 687. Used as material contrary evidence concerning consent and state-law protections. It is a legal position, not a final merits finding.

S06. California Attorney General, 28 May 2026.

Attorney General Bonta Sues Chrome Holding Co., Formerly Known as 23andMe, Over 2023 Data Breach.

Used only for the official current-status statement that California's separate challenge to the bankruptcy sale was pending. The data-breach allegations in that release are outside this Central Question.

S07. 23andMe Research Institute, Privacy Statement, last updated 19 May 2026.

Principal locator: Data Sharing section, change-of-ownership paragraphs. Used for current successor wording concerning future transfer of personal and genetic information. The policy does not independently prove operational effectiveness.

S08. 23andMe Research Institute, 30 October 2025.

23andMe Research Institute Appoints Privacy Advisory Board.

Used as an observable implementation indicator. Board formation is not treated as proof that oversight effectiveness has been independently audited.

PRODUCT STATUS

Research status: Research Complete / Approved

Text version: 1.1

Evidence basis: Source Freeze SF1

Evidence Cut-off: 21 August 2026

Public demonstration status: V104 Public Demonstration Dossier produced and integrated by express instruction on 22 August 2026.

Professional boundary: This public demonstration is not legal advice or regulated certification.

Reality before reliance.

RELEASE-DATE CURRENT-STATUS CHECK

Release-date current-status check completed 23 August 2026. The bankruptcy matter remains active administratively, with a claims hearing scheduled for 25 August 2026, but no material official development was identified that changes the narrow privacy-transfer finding or Source Freeze SF1.

This release-date check does not silently extend the frozen evidence universe. A material new controlling source would require the matter to reopen under the v11.0 update trigger.

DOCUMENT 2

CLAIMS AND EVIDENCE MATRIX

Claim-level factual status, evidential confidence, reliance and qualification control

Claims-and-Evidence Matrix

ID	Claim / proposition	Principal support	Contrary / qualification	Factual status
C01	The petition-date Privacy Statement contemplated transfer of personal information in bankruptcy/change of ownership and continued application of the Privacy Statement after transfer	S01; S02; S03	Historical policies and state-specific notices created additional questions	SUPPORTED
C02	The addition of the word bankruptcy in 2022 materially expanded 23andMe's transfer rights	None established	S01 expressly rejected material change; earlier versions since 2007 contemplated merger/acquisition/asset-sale transfer	NOT SUPPORTED
C03	The petition-date clause alone fully resolved whether every customer's genetic information could lawfully transfer without further consent	Company/court supported transaction under bankruptcy framework	S01; S05; Ombudsman/state positions; customer-specific historical notice/consent unresolved	NOT SUFFICIENTLY SUPPORTED
C04	The court approved the TTAM transaction despite remaining state objections	S01	Appeal/challenges followed	SUPPORTED

ID	Claim / proposition	Principal support	Contrary / qualification	Factual status
C05	TTAM agreed to additional privacy safeguards beyond merely inheriting the existing policy	S01; S04	Effectiveness and state-by-state coverage vary	SUPPORTED
C06	The successor retained and strengthened future genetic-data transfer restrictions in its May 2026 Privacy Statement	S07	Does not prove every control's operational effectiveness	SUPPORTED
C07	A reasonable user could treat the original representation as false	None	S01 and S02 confirm genuine textual support; qualification concerns completeness, not falsity	NOT SUPPORTED

Control note: classifications are matter-specific and bounded by the Evidence Cut-off. A source ID refers to the Source and Evidence Register in Document 4.

DOCUMENT 3

MASTER CHRONOLOGY

Material events, dates, status and evidentiary significance

Controlled chronology

ID	Date	Event	Event / evidential status	Sources
MCH-001	2007-01-01	By 2007 and thereafter, Privacy Statement versions contained transfer language for merger/acquisition/asset-sale scenarios	Judicially described	S01
MCH-002	2022-01-01	23andMe added 'bankruptcy' to the transfer clause; exact date within 2022 not material to limited finding	Judicially described	S01
MCH-003	2025-03-23	23andMe filed Chapter 11 petitions	Established public/judicial fact	S01
MCH-004	2025-03-31	FTC Chairman warned that privacy promises should continue to bind in bankruptcy transfer	Official regulator position	S02
MCH-005	2025-06-09	Coalition of state attorneys general challenged transfer of genetic data without affirmative consent	Official adverse legal position	S05
MCH-006	2025-06-13	TTAM selected as winning bidder at \$305m with announced privacy safeguards	Established transaction event	S04; S01
MCH-007	2025-06-27	Bankruptcy Court issued Memorandum Opinion approving proposed transaction and rejecting principal objections	Judicial finding/order context	S01

ID	Date	Event	Event / evidential status	Sources
MCH-008	2025-07-14	TTAM acquisition completed	Established public transaction fact	Company/SEC record
MCH-009	2025-10-30	23andMe Research Institute announced Privacy Advisory Board	Implementation indicator	S08
MCH-010	2026-05-19	Successor Privacy Statement updated; retains transfer clause and adds future genetic-data transfer restrictions	Current primary source	S07
MCH-011	2026-05-28	California AG publicly described bankruptcy-sale challenge as pending	Official current-status statement	S06
MCH-012	2026-08-21	Evidence cut-off for Aperture Quick Evidence Check	Control date	Internal

Chronology control: event dates are distinguished from later publication, filing and current-status dates where material. The chronology does not convert allegations into findings.



DOCUMENT 4

SOURCE AND EVIDENCE REGISTER

Controlling public sources, exact web locators, material use and reliance limitations

Source-control method

Each material public source is tied to the propositions attributed to it in this case pack. A source is not used to establish a proposition beyond its authority, scope or recorded limitation. Where a public source link is available, the descriptive Source link below is clickable.

Material public-source register

S01 - In re 23andMe Holding Co., Case No. 25-40976-357, Memorandum Opinion

Authority / issuer	U.S. Bankruptcy Court, Eastern District of Missouri
Date	27 June 2025
Source type / tier	Primary judicial source
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	Policy history, petition-date wording, Privacy Ombudsman and state objections, TTAM safeguards, court interpretation and transaction approval.
Does not establish / limitations	Controlling within the bankruptcy matter; not a universal state-law privacy opinion.
Reliance grade	Very High for the propositions adjudicated or recorded by the court.

Public URL: [Open public source](#)

S02 - Chairman Andrew N. Ferguson letter regarding the 23andMe bankruptcy

Authority / issuer	Federal Trade Commission
Date	31 March 2025
Source type / tier	Primary regulator source
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	FTC position on continuity of privacy promises and purchaser adherence in a bankruptcy-related transfer.
Does not establish / limitations	Regulatory position, not adjudication of customer-specific state-law rights.
Reliance grade	High for the FTC position and quoted policy wording.

Public URL: [Open public source](#)

S03 - 23andMe Confirms All Potential Buyers Must Agree to Comply With Privacy Policy and Applicable Law

Authority / issuer	23andMe Holding Co.
Date	26 March 2025
Source type / tier	Primary-party source
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	Primary-party representation that bidders were required to comply with the privacy policy and applicable law.
Does not establish / limitations	Interested-party statement; not independent corroboration.
Reliance grade	High for what 23andMe publicly represented.

Public URL: [Open public source](#)

S04 - 23andMe Reaches Agreement for Sale of Business to TTAM Research Institute Following Final Round of Bidding in Court-Approved Sale Process

Authority / issuer	23andMe Holding Co.
Date	13 June 2025
Source type / tier	Primary-party transaction source
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	US\$305 million winning bid and announced transaction-specific privacy safeguards.
Does not establish / limitations	Interested-party source; read with S01 and not treated as independent proof of implementation.
Reliance grade	High for announced transaction terms.

Public URL: [Open public source](#)

S05 - Objection to the Debtors' Proposed Sale of Customers' Assets, In re 23andMe Holding Co., Docket 687

Authority / issuer	Multistate Attorneys General
Date	9 June 2025
Source type / tier	Primary adverse government filing
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	Material contrary position concerning consent and state genetic-privacy protections.
Does not establish / limitations	Legal position and objection, not a final merits finding.
Reliance grade	High for the existence and content of the objection.

Public URL: [Open public source](#)

S06 - Attorney General Bonta Sues Chrome Holding Co., Formerly Known as 23andMe, Over 2023 Data Breach

Authority / issuer	California Attorney General
Date	28 May 2026
Source type / tier	Primary government statement
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	Current-status statement that California's separate bankruptcy-sale challenge remained pending.
Does not establish / limitations	Separate breach allegations are outside this Central Question.
Reliance grade	High for the described current-status position at the evidence cut-off.

Public URL: [Open public source](#)

S07 - Privacy Statement

Authority / issuer	23andMe Research Institute
Date	Last updated 19 May 2026
Source type / tier	Current primary-party policy
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	Current successor wording for change of ownership and future transfer restrictions concerning genetic data.
Does not establish / limitations	Policy wording does not independently prove operational effectiveness or determine every customer-specific legal right.
Reliance grade	High for the current wording; conditional beyond that.

Public URL: [Open public source](#)

S08 - 23andMe Research Institute Appoints Privacy Advisory Board

Authority / issuer	23andMe Research Institute
Date	30 October 2025
Source type / tier	Current primary-party governance source
Precise locator	Exact public web source at the linked URL; proposition-specific use and limitations are recorded below and in the Principal Investigative Dossier.
Material propositions supported / use	Observable implementation indicator for the Privacy Advisory Board safeguard.
Does not establish / limitations	Formation does not prove independent effectiveness of the Board or all safeguards.
Reliance grade	High for board formation only.

Public URL: [Open public source](#)



DOCUMENT 5

PUBLIC PORTFOLIO EDITION

Decision-focused public summary of the controlled research record

Public Portfolio Edition

INDEPENDENT PUBLIC-SOURCE CASE STUDY - NOT A CLIENT ENGAGEMENT. This Public Portfolio Edition summarises the controlled evidence record. It is not a substitute for the complete case pack, specialist advice or a commissioned matter-specific engagement.

Central Question

Did 23andMe's Privacy Statement in force when it entered bankruptcy provide sufficient factual support for a customer to conclude that existing privacy protections would continue to bind a purchaser if customer data changed ownership through bankruptcy, and what material qualification remained?

Principal evidence-led assessment

23andMe entered Chapter 11 proceedings in March 2025 while holding highly sensitive customer information, including genetic information. The bankruptcy created a practical reliance question that could not responsibly be answered by headlines alone: what did 23andMe's own privacy wording actually support if customer information changed hands through a sale of the business? [S01][S02]

This Quick Evidence Check examines one narrow representation and the principal official evidence needed to test it. It does not reconstruct the entire bankruptcy, determine every customer's legal rights, assess the separate 2023 cybersecurity

incident, or provide a legal opinion. Its purpose is to show what a tightly defined evidence-assurance product can establish, what qualification remains material, and when a broader review would be required.

Reliance boundary

This public portfolio summary must be read with the full dossier, Claims-and-Evidence Matrix, Master Chronology and Source and Evidence Register. Evidence Cut-off: 21 August 2026. Status: APPROVED FINAL PUBLIC EDITION.

What the complete case pack demonstrates

The Quick Evidence Check demonstrates how Aperture Research Works separates claims, source authority, contrary evidence, unresolved gaps and the level of reliance the record can responsibly support. It does not imply that the subject commissioned or endorsed the work.

DOCUMENT 6

FINAL DELIVERY MANIFEST

File-level control, release status and technical production record

Final Delivery Manifest

Control	Recorded value
Public brand	Aperture Research Works
Matter	23andMe: What Did the Privacy Promise Actually Support?
Product / capability	Quick Evidence Check
Document	Complete Case Pack (CCP)
Document version	1.0
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Operating mode	Independent Public-Source Case Study - Not a Client Engagement
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Human approval of exact PDF	Paul Hattingh 23 August 2026 Human-approved for public release
Public-source links	8 clickable descriptive public-source links in the Source and Evidence Register
Output filename	APERTURE_23ANDME_CCP_APPROVED_FINAL_PUBLIC_V1.0.pdf

Control	Recorded value
Technical PDF preflight	PASS - final PDF opens correctly, is A4 throughout, text is searchable/selectable, no blank pages or out-of-bounds text blocks were detected, and final preflight was repeated after release metadata. Page count: 22.
Page-by-page render inspection	PASS - all 22 pages rendered at 200 DPI and visually inspected after final release metadata; no clipping, overlap, broken glyphs or unintended blank pages detected.
Font audit	PASS - only permitted embedded Carlito and Liberation Sans families detected; no silent font substitution detected.
Hyperlink audit	PASS - 10 hyperlink annotations detected, including 8 unique descriptive public-source URLs; links preserved in the final PDF.
External SHA-256	Recorded in companion V105 SHA-256 manifest after the final immutable PDF bytes are created.
Release restriction	Approved for public display as an independent public-source case study. This is not a client engagement, legal opinion, specialist certification or permanent-currentness guarantee.
Final page count	22
Authorised release status	APPROVED FINAL PUBLIC EDITION
Human approver	Paul Hattingh
Human approval date	23 August 2026
Scope of approval	Complete combined case-pack PDF, substantive findings and qualifications, public portfolio presentation, source register, release wording and publication status.
Corrections required by approver	None specified in the 23 August 2026 approval instruction; production-control corrections and release-state corrections implemented under v11.0.
Release-date current-status check	Release-date current-status check completed 23 August 2026. The bankruptcy matter remains active administratively, with a claims hearing scheduled for 25 August 2026, but no material official development was identified that changes the narrow privacy-transfer finding or Source Freeze SF1.
Bookmarks and navigation	PASS - 49 top-level/internal bookmark entries detected; document order and navigation checked.
Production Conformity	PASS for Approved Final Public Edition, subject to stated future update triggers.
Mandatory review status	Completed / Not Applicable as recorded for the approved public wording; future-trigger obligations remain controlling.
Final ZIP and hash audit	Performed at package level after the immutable PDF set is frozen; authoritative PDF and ZIP SHA-256 values are recorded in the companion V105 release manifest and QC report.
Included professional functions	Principal Investigative Dossier; Claims-and-Evidence Matrix; Master Chronology; Source and Evidence Register; Public Portfolio Edition; Final Delivery Manifest. The combined PDF is the complete public case pack.
Specialist Appendix status	Not created as a repetitive standalone component. Any genuine specialist-review requirement or technical limitation is disclosed in the relevant dossier and release-control sections.



END OF COMPLETE CASE PACK

23andMe: What Did the Privacy Promise Actually Support?

Approved Final Public Edition

**REALITY BEFORE RELIANCE.
VERIFICATION BEFORE INTERPRETATION.
EVIDENCE BEFORE NARRATIVE.**

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