

## **INNODEM NEUROSCIENCES Privacy Policy**

This Policy is a statement of our general privacy policy and practices governing the ways in which we collect, hold and use information about individual persons. This Policy applies to data gathered by us from our mobile applications and not from any other source. BY USING INNODEM'S MOBILE APPLICATIONS, YOU CONSENT TO THE COLLECTION AND USE OF INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. YOU ALSO ACKNOWLEDGE THAT INNODEM NEUROSCIENCES (INNODEM) MAY PERIODICALLY CHANGE, MODIFY, ADD OR REMOVE OR OTHERWISE UPDATE THIS PRIVACY POLICY AT ITS DISCRETION, WITHOUT PRIOR NOTIFICATION. It is our intention to post any such changes on this page so that you are fully informed concerning the types of information we are gathering, how we use it, and under what circumstances it may be disclosed.

Our Privacy Policy is easy to find as it is located on our homepage and is linked to any part of a site where personal data are requested. It is also available in each of our Mobile applications. At certain data collection points, further explanation may be provided, where appropriate, as to the purposes for which the data will be collected and used. This Policy, coupled with any supplementary explanation, will tell you how we will treat any data about yourself that you voluntarily submit in connection with your use of our Mobile applications.

### **1. Pledge on Privacy**

Innodem Neurosciences ("Innodem" or "we") respects and is committed to protecting privacy and safeguarding the personal data entrusted to us by the users of our Mobile applications. We pledge to fully comply with recognized standards of privacy protection, applicable law (including PIPEDA and HIPAA), and internal privacy guidelines and policies.

The term "personal data" as used in this Policy refers to information such as your age, gender, medical condition, imaging results, video of person's facial features that can be used to identify you. Information may cease to be personal data when it is stripped of all identifiers or aggregated with personal data collected from other individuals. Generally, we will not process your personal data without your consent as described in the "Information and Consent Form that you have initially signed. However, we reserve the right, in exceptional circumstances to conduct additional processing to the extent permitted or required by law or in support of any legal or criminal investigation.

The next sections explain how and when we collect personal data from you.

### **2. Intended use of Personal Data**

In the case of General Public Mobile applications available on App Stores, you may need to register and complete certain fields (some are required and some are optional), as well as choose a username and password. In these situations, if you choose to withhold any personal data requested by us, it may not be possible for you to gain access to certain parts of the websites and for us to respond to your query.

In the case of Innodem's Mobile applications used in the course of scientific research, the use of personal data will be described in an "Information and Consent Form" provided to the patients / users prior to the collection of these personal data.

Innodem processes personal data for the purposes which we inform you about when we ask you for information. Generally, when you voluntarily provide us with your personal data, we will assume you consent to our collection, use and disclosure of that information for the purposes identified at the time of

collection. Information you send to us is used only to help address your request and is otherwise kept confidential.

If, at any time, you decide you do not wish to receive communications or other services from us, you can let us know by contacting us using the contact information below.

### **3. Non-Disclosure of Information**

Innodem will not sell, share, or otherwise distribute your personal data to third parties except as provided in this Privacy Policy. We may disclose your personal data to a third party if we are required to do so because of an applicable law, court order or government regulation, or if such disclosure is otherwise necessary in support of any legal or criminal investigation. We may disclose your personal data to our Business Associates that agree to treat it in accordance with this Privacy Policy, but only in accordance with the terms of this Privacy Policy. Personal data may occasionally be transferred to third parties who act for or on behalf of Innodem, for further processing in accordance with the purpose(s) for which the data were originally collected, such as delivery services, evaluation or technical support. These third parties have contracted with Innodem that they will only use personal data for the agreed upon purpose, will not sell your personal information to third parties, and will not disclose it to third parties except with your consent, or as may be required by law or in support of any legal or criminal investigation.

Where such disclosure of personal data to a third party occurs, we will endeavor to ensure that the processing is performed in accordance with the purposes and within the limits under which the data were originally collected.

### **4. Right of Access**

You have the right to ensure that your personal data is always up-to-date. You have the legal right to require us to correct your personal data. In addition, you can always tell us to stop contacting you. If you wish to contact us regarding our use of your personal data, please e-mail us at [info@innodemneurosciences.com](mailto:info@innodemneurosciences.com).

Your requests will be dealt with in a prompt and proper manner. Requests to delete personal data will be subject to any applicable legal and ethical reporting or document filing or retention obligations imposed on Innodem. Innodem's response to all requests to ePHI access or correction are governed by its internal "Individual Access right to ePHI Policy and Procedures"

### **5. Security and Confidentiality**

To ensure the security and confidentiality of personal data that Innodem collects, Innodem uses best practices recognized by the industry, such as encryption, use of secured links, password protection and other security methods. Access to personal data is restricted to those employees who have a need to use the data and who have been trained to handle such data properly and observe strict standards of confidentiality. In the course of handling your personal data, we take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction. While we cannot guarantee against any loss, misuse, unauthorized access, disclosure or alteration to data, we try to prevent such unfortunate occurrences.

### **6. Data Transfer Abroad**

We are using Cloud services to store and process the collected data. We may transfer your data to one of the Innodem databases outside of your country of domicile. Even if laws in the country to which the data

is to be transferred does not require us to provide adequate protection for your data, we will nonetheless seek to ensure that data transfers to Innodem databases in that country are adequately protected.

## **7. Limitation on Retention of Personal Data**

Innodem keeps your personal data only for as long as is reasonably needed for the purposes for which such information was collected, and in accordance with any applicable legal or ethical reporting or documentation retention requirements.

## **8. Contact us**

If you have any queries or complaints about our compliance with this Privacy Policy and Industry standards such as HIPAA, PIPEDA, or if you would like to make any recommendations or comments to improve the quality of our Privacy Policy, please e-mail us at [info@innodemneurosciences.com](mailto:info@innodemneurosciences.com).

## **9. Additional information**

Our staff will be happy to answer any questions you may have about your personal information. If you would like more information about our policies, or you would like to see exactly what personal information we have about you in our records, or you wish to register a complaint, please contact:

Guy Charbonneau / VP Data Governance & Compliance

Address: 400 rue Montfort, C-0230, Montreal (Qc)

Phone: 438-880-8024

Email: [guy@innodemneurosciences.com](mailto:guy@innodemneurosciences.com)

You can also contact the Privacy Commissioner of Canada for assistance between the hours of 8:30 a.m. to 4:30 p.m. est, at:

Toll-free: 1-800-282-1376

Phone: (819)994-5444

Fax: (819)994-5424

TTY:(819)994-6591

or by mail at:

30 Victoria Street

Gatineau, Quebec

K1A 1H3

or on the web at:

<http://www.priv.gc.ca>

*This privacy policy is last updated on June 18, 2020. We aim to constantly improve the tools available to you to manage that data that you provide to us. Please refer to this page from time to time to review these and other new features.*