

iMD Health Global Corp.

## **PRIVACY POLICY**

**(updated: January 1, 2020)**

iMD Health Global Corp. is committed to maintaining the privacy and security of our customers' personal information. Through this privacy statement, iMD Health wants to assure you of our commitment to privacy and security. Our privacy philosophy is based on the concept of fair information practices. This means we provide our customers with notice of how we manage information so that they can have a more informed understanding of how we operate.

### **Notice**

If we collect information from or about you, we will tell you what information is being collected, how, by whom, and for what purposes.

### **Ownership of Personal Information**

Nothing in this Agreement provides iMD Health with any rights in or to, or control over Personal Information, other than the ability to access and use Personal Information as set out in this Agreement.

### **Use of Personal Information**

“Personal Information” means information about an identifiable individual including without limitation, his or her gender, address, telephone number, and email address to which iMD Health has access under the Agreement for the provision of the Services. iMD Health acknowledges and agrees that:

“Services” means collectively the products and services to be provided by iMD Health under the Agreement.

the Services facilitate User’s ordinary operations; and

it will be necessary for the purpose and in the course of providing the Services, for iMD Health to access, use, hold and store Personal Information.

### **Security**

We use recognized industry safeguards to protect personally identifiable information from unauthorized access or use. We will employ industry recognized security safeguards to protect the personally identifiable information that you have provided to us from loss, misuse and unauthorized alteration.

iMD Health shall:

except with the prior written approval of User, hold Personal Information in a password protected secure and segregate Personal Information from other data held by iMD Health. We use secure TLS 1.2. This is the highest level of encryption of commercial grade transport security available.

maintain appropriate access controls to facilities, equipment, applications and other software and systems used in connection with Personal Information;

periodically review and update where appropriate its security safeguards;

ensure that any permitted subcontractor it retains to assist it in providing the Services agrees to comply with these privacy terms and conditions;

take reasonable steps, including the application of appropriate sanctions, to ensure Authorized Personnel performs its service;

terminate Authorized Personnel access to Personal Information immediately upon termination of their employment or affiliation with iMD Health; and

not, and hereby forever waives any and all right to, withhold any Personal Information from User to enforce any dispute relating to the terms of the Agreement or any other matter between iMD Health and User.

### **Access**

You will have the opportunity to update your personal information that you have provided to us via an 'Account Settings' section within your User Profile. We will also take steps to make sure that any updates that are provided are processed in a timely and complete manner.

### **Cookies Tracking**

We capture the paths taken as you move from page to page (i.e., your "click stream" activity). Information we collect on imdhealth.com may be used to enhance your use of this Web site in ways like these:

- Arrange the Web site in the most user-friendly way
- Customize your browsing experience of this Web site
- Communicate special offers and featured items to you, if you choose to receive such notices

### **Respond to your question or suggestions**

Disclosure of personal information for legal purposes and protection of imdhealth.com and others: We reserve the right to share your personal information with third parties if required to do so by law or if we believe such action is necessary in order to: (a) conform with the requirements of the law or to comply with legal process served upon us; (b) protect or defend our legal rights or property, imdhealth.com, or our users; or (c) investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of the terms and conditions of using imdhealth.com.

### **Notice**

iMD Health shall give User written notice via email within 7 business days:

upon becoming aware of the loss, theft, or unauthorized access, use (including downloading, copying or manipulating), disclosure or destruction of Personal Information;

upon becoming aware of any breach or attempted breach of the security of its technology, equipment or facilities that impacted, could reasonably have impacted, or could impact the security and/or integrity of Personal Information;

if it receives any privacy-related requests or complaints in relation to the Services;

if it receives any subpoena or order relating to Personal Information; and

if it fails to comply or anticipates that it will be unable to comply with this Schedule, provide a description of its non-compliance or anticipated non-compliance and the steps it proposes to take to address the non-compliance or prevent the anticipated non-compliance.

### **Linking to Other Sites**

Please remember that when you use a link to go from imdhealth.com to another Web site, the imdhealth.com Terms of Use and this Privacy Policy are no longer in effect. Your browsing and interaction on any other Website, including any site that has a link on imdhealth.com, is subject to the rules and policies of that site. We encourage you to read the rules and policies of the sites you visit to further understand their procedures for collecting, using, and disclosing personal information.

### **Choice**

We will give you options about how the personal information that you provide us may be used. Before we use your personal information for any purpose, we will give you choices about whether or not to allow us to engage in that use. We will give you the opportunity to keep us from using or sharing the personal information that you have provided to us for purposes other than to fulfill your request. To exercise this choice, we will allow you to notify us of your preferences during the information collection process. If there are third parties that process iMD Health data, we will require them to hold all personally-identifiable information confidential, and to use our customer information only for the purpose of fulfilling their business obligation. iMD Health does not sell personally identifiable information to third party marketers.

### **Customer Service and Recourse**

We will tell you how you can contact us regarding our privacy statement and practices. If you have any questions about this privacy statement, our information handling practices, or any other aspects of your privacy and the security of information, please send an email to [support@imdhealth.com](mailto:support@imdhealth.com) or call us at 1-855-463-1463. Our mailing address is: iMD Health, 80 N Queen St., Suite 301. Toronto, Ontario. M8Z 2C9, ATTN: Privacy Officer.

We retain the flexibility to update this policy. iMD Health may periodically update this policy to describe how new Web features may affect our use of your information and to let you know of new controls and features that we may provide you. The date of the last update to this privacy statement is stated at the top of this document.