

# iHakeem Privacy Policy

Your privacy is important to us, so we have developed a Privacy Policy that covers how we collect, use, disclose, transfer, store and delete your personal information when you are using the ***iHakeem*** Application

You should review the entirety of this Privacy Policy and our Terms and Conditions before using the ***iHakeem*** application. If the processing of personal data as described in this Privacy Policy is not acceptable to you, do not use or continue using the **iHakeem** application and/or submit your personal information.

The Application is meant to give you access to a wide range of trained and licensed healthcare providers and schedule telehealth consultations using secure video and/or voice calls and text messaging. The Application facilitates virtual medical and other health-related consultations and, therefore, must, as is the case with standard healthcare visits, collect medical and other relevant personal information.

## **Collection and Use of Personal Information**

Personal information is data that can be used to identify or contact a single person. When using the Application and website, you may be asked to provide your personal information (pursuant to our Terms and Conditions). ***iHakeem*** and its affiliates may share this personal information and use it consistent with this Privacy Policy in providing you with our products and services. ***iHakeem*** and its affiliates may also combine it with other information to provide and improve our products, services, content, and advertising. You are not obligated to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Here are some examples of the types of personal information ***iHakeem*** may collect and how we may use it:

### **What personal information do we collect?**

When you create an account on the Application, download a software update, register to receive our newsletter, connect to our services, or contact us, we may collect a variety of information, including your name, date of birth, medical history, mailing and work addresses, phone number, email address, contact preferences, device identifiers, Internet Protocol (IP) address, location information, insurance information, credit card information, and profile information.

When you register a minor under your guardianship and thereby share another individual's personal information with us (which we will assume you have obtained permission or have the authority to do), **iHakeem** may collect the information you provide about those individuals such as their name, date of birth, mailing address, email address, medical history, and phone number. **iHakeem** will use such information to fulfil your requests, provide the relevant product or service, or for anti-fraud purposes.

We may ask for government-issued identification when you create an account on the **iHakeem** application, to verify your identity, or as required by law.

## How we use your personal information

With your consent, we may process your personal information to provide our products and services, for the purposes described in our Terms and Conditions of use and this Privacy Policy, for compliance with a legal obligation to which **iHakeem** is subject, and for the performance of a contract to which you are a party, to protect your vital interests, or when we have assessed it is necessary for the legitimate interests pursued by **iHakeem** or a third party to whom it may be necessary to disclose information. If you have questions about this legal basis, you can contact Customer Support.

The personal information we collect also allows us to keep you updated on our latest product announcements, software updates, and upcoming events. If you do not want to be on our mailing list, you may opt out at any time by modifying your account settings.

We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes. We may also use your personal information for account and network security purposes, including to protect our products and services for the benefit of all our users. We limit our uses of data for anti-fraud purposes to those which are strictly necessary and within our assessed legitimate interests to protect our customers and our services.

We may use your personal information, including your date of birth, to verify identity, assist with the identification of users, and determine appropriate products and services. For example, we may use the date of birth to determine the age of the **iHakeem** account holders.

From time to time, we may use your personal information to send important notices, such as communications about appointments made, prescriptions issued, purchases made, tests ordered, and changes made to our terms, conditions, and policies. Because this information is important to your interaction with **iHakeem**, you may not opt out of receiving these communications.

We may also use personal information for internal purposes such as auditing, data analysis, and research to improve **iHakeem** products, services, and customer communications.

## **Collection and Use of Non-Personal Information**

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we may collect and how we intend to use it:

We may collect information such as occupation, language, unique device identifier, referrer Uniform Resource Locators (URLs), and location where the ***iHakeem*** product is used so that we can better understand customer behavior and improve our products, services, and advertising.

We may collect information regarding customer activities on our application or website and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of the most interest. Aggregated data is considered non-personal information for this Privacy Policy.

We may collect and store details of how you use our products and services including search queries. This information may be used to improve the relevancy of results provided by our services. Except in limited instances to ensure the quality of our services over the Internet, such information will not be associated with your IP address.

With your explicit consent, we may collect data about how you use your device and our applications to help our application developers improve our applications and products.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

## **Cookies and Other Technologies**

The ***iHakeem*** application, website, services, online services and email messages may use “cookies” and other technology such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that IP addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for this Privacy Policy.

***iHakeem*** may engage with advertisers. However, ***iHakeem*** domains will not include any of your personal data in paid advertisements or will share your personal data with such parties without your consent.

The **iHakeem** domains may also use cookies and other technologies to remember personal information when you use our website, services, products, online services and applications. Our goal in these cases is to make your experience with **iHakeem** more convenient and personal. For example, knowing your contact information, hardware identifiers, and information about your computer or device helps us personalize your operating system and provide you with better customer service.

If you want to disable cookies, you may modify your browser settings. Please note that if you disable the cookies, you will alter your experience with our application and certain features of the website will not be available once cookies are disabled.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes IP addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date and time stamp, and clickstream data. We use this information to understand and analyze trends, administer the site, learn about user behavior on the site, improve our product and services, and gather demographic information about our user base. **iHakeem** may also use this information in our marketing and advertising services.

In some of our email messages, we use a “click-through URL” linked to content on the **iHakeem** website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages. Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

## Disclosure to Third Parties

**iHakeem** will, in certain circumstances, provide third parties with certain of your personal information to administer or provide the services that you are requesting, including scheduling consultations with healthcare professionals or purchasing other products and services, or to improve our services, or having products requested or ordered delivered to you. When we do, we require those third parties to handle it by relevant laws. Personal information will never be shared with third parties for their marketing purposes. For example, when you create an **iHakeem** account and request a consultation with a healthcare professional, you authorize **iHakeem** and such healthcare professional to exchange the information you provide during the **iHakeem** account activation process to provide the Service, including information about your device. If your request is accepted, your interaction will, among other things, be governed by **iHakeem** and the healthcare professional's respective privacy policies.

## **Service Providers**

***iHakeem*** shares personal information with individuals and companies who provide services such as providing medical and healthcare services, fulfilling customer orders, delivering products to you (under our Terms & Conditions), management and enhancement of customer data, processing of information processing, provision of customer service, assessment of customer interest in our products and services and conduct of customer research or satisfaction surveys. These companies are obligated to protect your information and may be located outside of Kuwait.

## **Payments**

Our services prices will vary according to services/consultations provided to our patients on **iHakeem**

## **Others**

Your medical EMR won't be disclosed to any party without your consent including your treatment provider.

## **Protection of Personal Information**

***iHakeem*** takes the security of your personal information very seriously. ***iHakeem*** online services such as the Application and website protect your personal information during transit using encryption and other data security measures that are Health Insurance Portability and Accountability Act (HIPAA) compliant. When your data is stored by ***iHakeem***, we use computer systems with limited access housed in facilities using physical security measures. The data we collect is stored in encrypted form including when we utilize third-party storage. It should however be remembered that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security and infallibility.

You are responsible for the personal information you choose to share or submit to others online or offline. ***iHakeem*** will not take responsibility for your decision to make any personal information public.

## **Integrity and Retention of Personal Information**

***iHakeem*** makes it possible for you to keep your personal information accurate, complete, and up-to-date. We will retain your personal information for the period necessary except for EMR & other medical and personal data after your consent, to fulfil the purposes it is collected for and as outlined in this Privacy Policy. When assessing this period, we carefully examine the reason such personal information was collected and if we establish a relevant need, we only retain it for the shortest possible period to realize the purpose of collection unless a longer retention period is required by law.

## Access to Personal Information

You can help ensure that your information is accurate, complete, and up-to-date at any time. For the personal information we hold, we will provide you with access, including a copy, for any purpose including to request that we correct the data if it is inaccurate or delete the data if ***iHakeem*** is not required to retain it by law or for legitimate business purposes.

We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. We may also decline aspects of deletion or access requests if we believe doing so would undermine our legitimate use of data for anti-fraud and security purposes as described earlier. Unless restricted by law or otherwise, you may request from us the deletion of your personal information. That information will be removed from our active database. However, ***iHakeem*** reserves the right to keep and use de-identified data as permitted under this Privacy Policy.

## Children

Individuals under the age of 21 are not permitted to create their ***iHakeem*** accounts unless their parent or guardian has provided verifiable consent, and such individuals must be placed under a parental account. In such case, the parent or guardian must review the Application and website Terms and Conditions and this Privacy Policy before they can begin the ***iHakeem*** account creation process for their child. If we learn that we have collected the personal information of an individual under 21 outside the above circumstances, we will take steps to delete the information as soon as possible.

## Location-Based Services

To provide location-based services on the Application where applicable, ***iHakeem*** and our partners and licensees, may collect, use, and share precise location data, including the real-time geographic location of your computer or device. Where available, location-based services may use GPS, Bluetooth, and your IP address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your device's approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used by ***iHakeem*** and our partners and licensees to provide and improve location-based products and services. For example, your device

may share its geographic location with the Application when you opt in to their location-based services. Some location-based services offered by **iHakeem** require your personal information for the feature to work.

### **Third-Party Sites and Services**

The **iHakeem** websites, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include your personal information is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties before engaging with them.

### **International Transfer of Information**

All the information you provide may be transferred to or accessed by other entities as described in this Privacy Policy. **iHakeem** will take all reasonable steps necessary to ensure that your information is treated securely and by this Privacy Policy and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

### **Our Commitment to Your Privacy**

To make sure your personal information is secure, we communicate our privacy and security guidelines to all employees and strictly enforce privacy safeguards within the institution, be assured that we won't sell or use your data for any purpose other than the declared medical purposes, we won't use your data in any of training, Marketing & sales purposes.

### **Privacy Questions**

If you have any questions or concerns about the **iHakeem** Privacy Policy or data processing, or if you would like to make a complaint about a possible breach of local privacy laws, please contact Customer Support.

All such substantive contacts receive a response within seven (7) business days wherever possible - providing a response on the issue raised, requesting additional information where necessary or indicating that a response will require additional time.

Where your complaint indicates an improvement could be made in our handling of privacy issues, we will take steps to make such a change at the earliest next reasonable opportunity. If a privacy issue has resulted in a negative impact on you or another person, we will take steps to address that with you or that other person.

***iHakeem*** may update its Privacy Policy from time to time and on an as-needed basis. When we change the policy, a notice will be posted on the Application and our website along with the updated Privacy Policy. We will also contact you via your contact information on file, for example by email, notification or some other equivalent method.