



PRIVACY POLICY - Clients/Patients

StaminaSys considers the confidentiality of your personal information to be a fundamental human right. The StaminaSys application is designed to centralize, minimize the collection and use of personal data, ensure transparency and control of therapist and client/patient information.

About this policy:

a) In this policy, personal information means any information or data that relates to an individual and allows, directly or indirectly, that individual to be identified.

b) The purpose of this policy is to inform you of the manner in which StaminaSys collects, processes, uses, protects and shares your personal information.

The StaminaSys application complies with the following standards regarding the protection of personal data and information:

- the confidentiality and information security standards defined by Canada Health Infoway ([confidentiality and security requirements and considerations for digital health solutions](#))
- Canada's [Personal Information Protection and Electronic Documents Act](#) (PIPEDA)
- the Quebec Act [respecting the protection of personal information in the private sector](#)
- the confidentiality and information security standards defined by the U.S. Health Insurance Portability and Accountability Act ([HIPAA](#))
- the European General Data Protection Regulation ([GDPR](#))

c) The person responsible for the protection of personal information and data controller of the StaminaSys application is Mr. Michel Dufresne, President of Innovation Intégrale Inc, owner of StaminaSys. He can be reached by telephone at 514.360.6440 or by e-mail at privacy@staminasys.com for any questions relating to this policy or to StaminaSys' privacy practices.

d) StaminaSys may be the controller or processor of your personal data that you have provided to us or that we collect from you when using this application, as described below. If you use the StaminaSys application, you agree to this policy and to the use and sharing of your personal data as described herein. You have the choice not to share your data, as described below, and to control how we use and share your data.

1. The information we collect about you

StaminaSys may collect or receive personal information about you, including username, password, first and last name, e-mail address, postal address, sex, gender identity, occupation, health history and interests.

You can choose what information you wish to enter into the StaminaSys application. However, if you choose not to disclose the personal data we have requested from you, you may not be able to exploit the full potential

of this application or its functionalities. We collect personal information about you at a number of different times, including the following:

- when we correspond with you as a user or potential user;
- when you use the StaminaSys application;
- when you register as a user of our service and an account is created for you;
- when you provide information, such as survey information;
- when you contact us for assistance;
- when StaminaSys sends us error reports or application analysis data;
- The StaminaSys application does not require you to provide sensitive information (for example, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data or data concerning sexual orientation). In the event that you provide the sensitive information listed above, you acknowledge that you have given us your explicit consent to collect such information.

2. Legal basis for processing

We will only collect and process your personal data if we have a lawful basis to do so. Our lawful basis includes consent (where you have given it), where processing is necessary for the performance of a contract with you and for the purposes of our legitimate interests or the legitimate interests of our third parties, provided that such interest does not override your rights and freedoms. Examples of legitimate interests include but are not limited to: (i) compliance with applicable law, (ii) protection against security or other threats, (iv) management of our business interests, including improvements to the application, and (iv) customer/user relationship issues.

3. Your rights: Access, Correction, Deletion

We retain the personal data you provide to us when registering for your StaminaSys account or any other information you voluntarily provide when using this application for (i) as long as your account is active or (ii) otherwise for a limited period of time, as long as necessary to fulfill the purposes for which we originally collected it, unless required by law. We retain all information provided as described in the **Use of Information** section below.

You have the right to request access to the information StaminaSys holds about you. You may do so by contacting us at privacy@staminasys.com. In order to respond to your request, we may need to verify your identity. If you believe the information we have on you is incorrect, you can contact us at privacy@staminasys.com and request a correction. Please note that any data that is no longer required for the purposes specified in point 1 above will be deleted.

As a client/patient you have the right to request the deletion of your personal data stored in our database by making a request to your therapist. Since laws and regulations require that a therapist has to keep a record for each customer/patient, they must first export your record in PDF format to keep for their records, and then contact us so that we can proceed with the deletion of your record from the StaminaSys database. Please note that StaminaSys may not be able to delete de-identified data, such as payments made for consultations. This data has been dissociated from your identity and is used for administrative purposes, quality improvement or application analysis. Once this data has been de-identified, it may no longer be possible to determine from

which user it originates. By using this application, you explicitly consent to your data being anonymized and used for the purposes described below.

4. How we use your information

a) Consent to share unidentified information. By using StaminaSys, all users agree and consent that StaminaSys may use any information they include in this application, provided that StaminaSys first de-identifies this information, which means that we will anonymize this information by removing the user's name and other personally identifying information. We may use this information for research and development and quality improvement for this application.

b) Consent to share personal information. StaminaSys may use the personal information we collect about you to:

- accomplish the services you have requested;
- manage your customer relationship and provide support;
- analyze your use of the application;
- communicate with you via e-mail, postal mail, telephone and/or mobile devices about products or services that may be of interest to you;
- manage our business;
- respond to an investigation, court order, legal process, or to investigate, prevent or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person, or as otherwise required by law; and
- perform functions as we describe at the time of collection.

StaminaSys sometimes uses other companies to provide services necessary for its activities. When providing these services, these companies will not have access to your Encryption-protected personal information. Should these companies have access to your personal information in order to provide their services, you accept and consent to such access. By contractual agreement, these companies must treat your information in accordance with this privacy policy and sign a confidentiality agreement. However, we will not be liable for any damages that may result from the misuse of your personal information by these companies.

5. How we share your information

a) Personally Identifiable Information.

StaminaSys will never sell your e-mail address or other personally identifiable information to any third party. We may store personally identifiable information in locations outside of StaminaSys' direct control (for example, on servers or databases hosted by hosting providers). Except as otherwise stated in this section, we will not disclose your personal information to third parties, other than consultants working on our behalf, without notifying you of our intention to share the information and giving you the opportunity to prevent the sharing of your information. From time to time, we may partner with companies based on the interests of our users. These partner companies will never see your e-mail address or any other information that could identify you or be used to contact you directly. Your information will never be shared directly with insurance companies or others who may use it to limit healthcare options to you or other customers for financial reasons.

b) Consent to share personal health information with other clinicians.

In the event that your clinician wants to share your personal and health information contained in your record with another clinician, they will first have to ask for your permission and then you will be able to accept by signing an informed consent form within the application.

c) Non-personally identifiable or "de-identified" information. The application's registration form may require users to provide StaminaSys with contact information (such as your name and e-mail address) and demographic information (such as your zip code, date of birth). StaminaSys uses your contact information from the registration form to send you information about the application. Your contact information may also be used to contact you if necessary. StaminaSys may use demographic and/or profile information to customize your experience with the application, make suggestions about what StaminaSys thinks you might be interested in, and display content based on your preferences. In addition, StaminaSys shall have the right to keep records of all data relating to the use of the website and our applications, including, but not limited to, usage, activity logs and clicks. StaminaSys may disclose this de-identified data to third parties, provided it is aggregated with data from other users of the application and presented in aggregate form. De-identified data may be shared with researchers and strategic partners to advance research or provide improved products.

d) We may need to share your information.

StaminaSys reserves the right to disclose information when required by law, such as through a subpoena or other legal process. StaminaSys may also disclose your information if we reasonably believe that it is necessary to (i) comply with law enforcement requests or any other applicable law; (ii) enforce any agreement between you and us; (iii) protect the security and integrity of our site, applications or services; and/or (iv) to protect ourselves, our users or others.

e) What happens in the event of a change of control?

We may become involved in an acquisition or divestiture of our business, products or services. The information we maintain, including names and e-mail addresses, and other information related to the StaminaSys service may be sold or transferred as part of such a transaction. We may also sell, assign or otherwise transfer such information in connection with the sale of all or substantially all of our business or assets. You will be notified by e-mail and a notice on our Web site of any change in the ownership or use of your information.

f) Testimonials.

We may contact you to ask if you would like to anonymously provide a testimonial about your experience as a Staminasys user. If at any time you wish to update or delete your testimonial, please contact us at privacy@staminasys.com.

6. How we store and process your information

a) Information collected by StaminaSys may be processed and/or stored in Canada, the United States, member states of the European Union or any other country in which StaminaSys, its affiliates or service providers operate. StaminaSys may transfer the information we collect, including personally identifiable information, to affiliated entities or third parties across borders and from your country or jurisdiction of domicile to other countries or jurisdictions. If you are located in the European Union or other regions and laws restrict the transfer and location of data storage, please note that we will comply with the laws applicable to us, which means that we will seek your explicit consent prior to such transfers.

b) We would like to inform you that in accordance with EU data protection laws, StaminaSys will act as a processor or sub-processor, and not as a controller with respect to personal information collected on behalf of your clinician.

7. How do we protect your information?

StaminaSys is concerned about protecting your privacy and data. This is why we use standardized technologies when transferring and receiving user data exchanged between StaminaSys and other companies in order to guarantee its security. This application has security measures designed to protect against the loss, misuse and alteration of information under StaminaSys' control. StaminaSys servers are regularly backed up and protected by security systems. However, we cannot guarantee the security of any information you transmit to us, nor can we guarantee that your information on StaminaSys cannot be accessed, disclosed, altered or destroyed by

breach of any of our industry standard physical, technical or managerial safeguards. If you have any questions about the security of our website and/or application, you can contact us at privacy@staminasys.com.

8. Your right to privacy in Canada

All personal information we collect from you is currently stored and processed in Canada. If you access the application from outside Canada, you should understand that by accessing our application, you are consenting to the transfer of your personal information to Canada. Please note that Canadian law may not provide the same privacy protections as the law in your jurisdiction. De-identified information may be stored in any other country in which StaminaSys, its affiliates or service providers operate as described above. StaminaSys may change this policy at any time. If StaminaSys is going to use personally identifiable information collected via the StaminaSys application in a manner materially different from that stated at the time of collection, StaminaSys will notify users by email and by posting a notice on this one thirty (30) days prior to such use. This Privacy Policy may not be otherwise modified except in a writing that specifically refers to this Privacy Policy and is signed by both parties.

9. Cookies

Cookies are small pieces of information stored by your browser on your computer's hard disk. Cookies, by themselves, do not provide us with your e-mail address or other personally identifiable information, unless you choose to provide us with such information, for example by registering with our website and/or application. However, once you have chosen to provide personal information to the website and/or application, this information may be linked to the data stored in the cookie. We use cookies to understand how the website/application is used and to improve content and service. We may also use cookies to offer you products or services. You have many choices when it comes to managing cookies on your computer. All major browsers allow you to block or delete cookies from your system. To find out more about your ability to manage cookies, please consult your browser's privacy features.

10. Links

StaminaSys may create links to other websites. StaminaSys will make a reasonable effort to link only to sites that meet similar standards in order to preserve each individual's right to privacy. However, many other sites not associated with or authorized by StaminaSys may contain links to our site. StaminaSys cannot control these links and is not responsible for the content of these sites.

11. Children's privacy

If you are under 18, you should use this application ONLY with the consent and involvement of a parent or guardian.

12. Successors and Assignments

This Privacy Policy is for the benefit of the successors and assigns of StaminaSys.

13. Contact

If you have any questions about this Privacy Policy, the practices of this application, your dealings with this application, or if you request access to, changes in, or deletion of information we have about you, you can contact privacy@staminasys.com. Upon request, StaminaSys will provide you with access to the information (e.g. name, address, telephone number) that StaminaSys collects and maintains about you. This application gives you the option of: changing, modifying or deleting information previously provided by writing to us at: privacy@staminasys.com

14. Opt-Out Clause

The StaminaSys application offers users the opportunity to opt-out of receiving communications from StaminaSys, with the exception of transactional correspondence. To opt-out of receiving communications from us, please send an e-mail to privacy@staminasys.com.