

Last revised: **March 18, 2025**

## **PRIVACY STATEMENT**

**Fallyx Inc.** and its affiliates (collectively, “**Fallyx**”, “**we**”, “**our**” or “**us**”) recognize the importance of privacy. The purpose of this Privacy Statement is to inform you about our privacy practices, including how we collect, use, and disclose your personal information.

### **What This Privacy Statement Covers**

This Privacy Statement covers the following topics:

- Personal Information We Collect
- How We Use Your Personal Information
- How We Share Your Personal Information
- Your Consent to the Collection, Use and Disclosure of Your Personal Information
- Our Use of Cookies
- Opting Out of Marketing Communications
- Retention, Storage, and International Transfer of Personal Information
- Information Security
- Accessing and Updating Your Personal Information
- Third-Party Websites and Services
- Children’s Personal Information
- Changes to this Privacy Statement
- How to Contact Us

### **Personal Information We Collect**

“Personal information” means information about an identifiable individual as described under Canadian privacy laws.

Personal information does not include any business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, work fax number or work e-mail address.

We may collect, use, and disclose different types of personal information, depending on our relationship with you. Generally, we collect the following types of personal information (not all of which may apply to you):

- identity information, such as your name, username or similar identifier, marital status, title, date of birth and gender;
- contact information, such as your billing address, delivery address, e-mail address and telephone numbers;
- technical and usage information when you use our website, such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- technical, behavioural and usage data that is identifiable to you when you use our technology applications, including any personal information you input into our applications;
- health information, such as your health history, incident reports, medications, information collected during the provision health care services (including observations, examinations, assessment, care, service or procedures done for health-related purposes and carried out to provide diagnose or treatment of an individual's physical or mental condition, carried out to prevent disease, injury or to promote health, or carried out as part of palliative care), health care programs and services you receive from us or your long term care home, your retirement residence or any other care facility (collectively, "care home"), the names of your health care providers, and your electronic health record credentials;
- information collected through the device (or devices) you use to access our products and services, including information collected through voice activated features of our products, sensors you may wear for use with our products and services, or location information, including GPS data, in each of these cases where you have granted us permission or access through the device to use such location, microphone, or other features and functionality;
- if you choose to enable push notifications on the device used to access our products and services, we may use your information, such as device ID or email address, to send push notifications as per your direction;
- event participation information, such as your enrollment and attendance at our events;
- information provided via surveys and contests; and
- marketing and communications information, such as your preferences for receiving our newsletter.

We also collect, use, and share aggregated and anonymized data for any purpose. Aggregated and anonymized data is not considered personal information because it cannot be used to identify you.

### **How We Use Your Personal Information**

We generally use your personal information for the following purposes:

- to determine your eligibility for our services in accordance with applicable laws and our policies;
- if you use any of our technology applications, to administer your use of those applications and provide our services to you;
- to respond to your inquiries, complaints or requests;
- to communicate with you through our newsletter, email, push notifications or other member communications;
- to manage our business and our arrangements with our clients, including to detect and prevent errors and fraud;
- to develop and derive anonymized and aggregated information;
- to improve the effectiveness and efficiency of our operations, products, services, and programs, and to develop new products, services and programs;
- to investigate legal claims and protect our rights, operations or property;
- for such other purposes as you may consent to from time to time; and
- as otherwise required or permitted by law.

### **How We Share Your Personal Information**

We generally identify to whom, and for what purposes, we will disclose your personal information (and we obtain your consent to such disclosure) at the time we collect your personal information.

If you are a patient, we may disclose your personal information to your care home and other health care providers, such as pharmacists, physicians, nurses, naturopaths or lab technicians, to facilitate the provision of your healthcare. This helps to coordinate care and ensure that everyone involved in your healthcare has the right information to meet your healthcare needs.

We may disclose your information when we believe such disclosure is required or permitted by law. In addition, we may disclose your personal information to a third party in the event of any significant business transaction, such as a merger or reorganization.

We rely on service providers to perform a variety of services on our behalf, such as payment card processors, technical support providers, artificial intelligence and machine learning service providers, data storage and processing service providers. If we transfer your personal information to a service provider, we require that they maintain the confidentiality of your personal information and keep it secure, and in the case of artificial intelligence and machine learning service providers, we ensure that your personal information is not used to train their underlying algorithms or models without your express written consent.

### **Your Consent to the Collection, Use and Disclosure of Your Personal Information**

We collect, use, and disclose your personal information with your consent or as permitted or required by law. How we obtain your consent, including whether it is express or implied, will depend on the circumstances and the sensitivity of the personal information in question. Generally, we will seek your consent at the time we collect your personal information, either orally, electronically, or in writing.

If you provide personal information about another individual to us, it is your responsibility to obtain the consent of that individual to enable us to collect, use and disclose their information as described in this Privacy Statement.

If you wish to withdraw your consent to our collection, use or disclosure of your personal information, please contact us using the contact information in the “How to Contact Us” section below. We will accommodate your request to withdraw consent, subject to legal or contractual restrictions. Withdrawal of your consent may mean that we will no longer be able to provide you with certain products or services.

### **Our Use of Cookies**

A “cookie” is a small text file that contains information and is stored on your computer. We use cookies and similar tracking technologies, such as web beacons and pixels, to automatically collect information about your use of our website and your interaction with our emails. Information we collect may include your IP address (or proxy server), device and application identification numbers, location, browser type, internet service provider and/or mobile carrier, pages and files viewed, searches, operating system and system configuration information, and date/time stamps associated with your usage.

We use this information to facilitate the use of our website, for our business or analytical purposes (including to assess website traffic and track search criteria), and to personalize web pages according to your choices and interests.

We do not use your personal information to engage in interest-based or behavioural advertising of our services across third-party websites or service offerings.

If you do not wish to accept cookies, you can adjust your web browser settings so that you automatically deny the storage of cookies or are informed each time a website requests to store a cookie. Previously stored cookies can also be deleted through your web browser. Please refer to your web browser’s help pages for more information. Some areas or features of our website rely

on cookies and may not work if you delete or decline cookies. For more information about cookies generally please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### ***Google Analytics***

Our website uses Google Analytics, a service from Google LLC (“Google”) that uses cookies. The information collected by the cookies (which includes your IP address) is transferred to Google who stores and processes the information in the United States. Google uses the information to provide us with an analysis of your use of our website, overall use of and traffic on our website. You can opt out of Google Analytics by downloading and utilizing the Google Analytics Opt-out Browser Add-on. By using our website, you understand and acknowledge our use of Google Analytics.

### **Opting Out of Marketing Communications**

If you no longer want to receive marketing-related e-mails from us, you may opt out by clicking the “unsubscribe” link at the bottom of any e-mail you receive from us. You may also opt out by contacting us directly using the contact information in the “How to Contact Us” section below.

If you opt out from receiving marketing-related e-mails, we may still need to send you communications about your use of our products or services, or other matters.

### **Retention, Storage, and International Transfer of Personal Information**

We will retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and as permitted or required by law.

We may transfer your personal information outside of Canada to fulfil the purpose for which we collected it, including for processing and storage by service providers located in the United States. While your personal information is outside of Canada, it is subject to the laws of the country in which it is located, which may have different data protection laws than Canada. Those laws may require disclosure of your personal information to authorities in that country. For more information about our policies and practices regarding service providers outside of Canada, contact us using the contact information in the “How to Contact Us” section below.

### **Information Security**

We have implemented physical, organizational, contractual, and technological security measures in an effort to protect your personal information from loss or theft, unauthorized access, use, or disclosure. For example:

- we train our employees and agents on the importance of safeguarding personal information; and
- we restrict access to your personal information to those employees or agents who need access for authorized purposes.

Despite these measures, we cannot guarantee that our safeguards will always be effective. A breach of security safeguards can result in risks such as phishing and identity theft. In such cases, we will act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

We may also require that you assist us in safeguarding your personal information. For example, if you create an account through our website or applications, you should use a unique and strong password and not share your password with others.

If you have reason to believe that your personal information is no longer secure, please contact us immediately using the contact information in the “How to Contact Us” section below.

### **Accessing and Updating Your Personal Information**

We expect you to supply us with updates to your personal information, when required. We will not routinely update your personal information unless such a process is necessary.

You may make a request to review any personal information about you that we have collected, used, or disclosed, and we will provide you with any such personal information to the extent required by applicable laws.

You may also challenge the accuracy or completeness of your personal information in our records. If you demonstrate that your personal information in our records is inaccurate, incomplete or equivocal, we will amend or delete your personal information as required. Where appropriate, we will transmit the amended information to third parties to whom we have disclosed your personal information.

We may require that you provide sufficient identification to fulfill your request to access or correct your personal information. Any such identifying information will be used only for this purpose. We will not charge you any fees to access your personal information in our records without first providing you with an estimate of the approximate fees, if any.

If you object to how we handle your request, you may have the right to make a complaint to the Information and Privacy Commissioner of Ontario in relation to health privacy matters or, if the complaint relates to other privacy matters, to the Privacy Commissioner of Canada.

### **Third-Party Websites and Services**

We may provide links to third-party websites for your convenience and information. We may also make opportunities available to you to purchase, subscribe to, or use other products or services from third parties with different privacy practices. Those other websites, products, or services are governed by the privacy statements and policies of the respective third party. This Privacy Statement does not extend to any websites, products, or services provided by third parties. We do not assume responsibility for the privacy practices of third parties and we encourage you to review all third-party privacy statements prior to using third-party websites, products, or services.

## **Children's Personal Information**

Our products and services are not intended for children under the age of 13 and we do not knowingly collect personal information from children under the age of 13. Children under the age of 13 should not use our products and services and should not provide us with their personal information.

## **Changes to this Privacy Statement**

The Privacy Statement was last revised as of the date that appears at the top of this page. To review a summary of recent changes, [click here](#).

From time to time, we may make changes to this Privacy Statement. When changes are made, they will become immediately effective when published in a revised Privacy Statement posted on our website, unless otherwise noted. We may also communicate the changes to this Privacy Statement by other means.

## **How to Contact Us**

All comments, questions, concerns, or requests regarding your personal information or our privacy practices should be forwarded to our Privacy Officer as follows:

Privacy Officer  
info@fallyx.com  
966 Bristol Road West, Mississauga, ON L5V 0C5