# MOSAIC HEALTH ANALYTICS INC. PRIVACY POLICY

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Mosaic Health Analytics Inc. ("we," "us," or "our") takes the privacy of personal information very seriously. This Privacy Policy describes our practices with respect to the collection, use, disclosure, and protection of personal information.

This Privacy Policy applies to personal information that we collect and process in the course of providing our services in Canada (our "Services"), including our mobile application (the "App") and website located at https://app.mosaicanalytics.health (the "Website").

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### **ABOUT OUR SERVICES**

We provide software tools that allow health care professionals, such as psychologists, psychiatrists, and therapists ("Practitioners"), to automatically generate clinical notes from their sessions with patients ("Patients").

We collect personal information relating to Practitioners to promote, provide and administer our Services, and otherwise manage our relationship. We refer to this information as "**Practitioner Personal Information**". We are accountable for and in control of Practitioner Personal Information under applicable privacy laws.

In providing our Services to Practitioners, we may collect and otherwise process personal information relating to Patients. We refer to this information as "Patient Personal Information". We process Patient Personal Information on behalf of Practitioners as their service provider. Practitioners remain accountable for and in control of Patient Personal Information.

### **COLLECTION AND USE OF PERSONAL INFORMATION**

**Account creation**: To access the Services, Practitioners are required to create an account with us. We collect Practitioner name, title, email address, password, and mobile phone number for the purposes of administering the account and managing our relationship.

**Payment information**: We may collect and use payment card information (including payment card number, security code, expiration date, cardholder name and billing address) for the purposes of processing payments for our Services.

**Inquiries:** If you contact us with an inquiry, you may be asked for information that identifies you, such as your name, address and a telephone number, along with additional information we need to help us promptly answer your inquiry. We may retain this information to assist you in the future and to improve our customer service and service offerings.

**Communications:** We may use Practitioner Personal Information to communicate with Practitioners in connection with our Services, including for promotional purposes. Practitioners may opt-out of promotional communications by using the "unsubscribe" instructions provided, or by contacting us as set out below.

**Patient Sessions:** Our Services capture interactions between Practitioners and Patients to generate clinical notes for Practitioners. We use any Patient Personal Information (which may include health information) that we collect and process in the performance of these Services for the sole purposes of providing these Services to Practitioners. This may include the use of Patient Personal Information to improve or further develop our Services. When we use Patient Personal Information for improvement or development purposes, we take steps to ensure that the information has been de-identified.

#### **DISCLOSURE OF PERSONAL INFORMATION**

We do not sell personal information. However, we may share personal information with third parties as described below.

**Service Providers:** In connection with our Services, we may transfer (or otherwise make available) personal information to third parties who provide services on our behalf. For example, we may use service providers to host our Services, store data and provide back-ups (including cloud-based service providers), or process payments. Personal information may be maintained and processed by us or our third-party service providers in the US, Canada, United Kingdom or other jurisdictions. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own purposes.

**Sale of Business:** We may transfer personal information in connection with a prospective or completed amalgamation, merger, acquisition or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of our business or assets or as part of a corporate reorganization or other change in corporate control.

**Legal:** We and our Canadian, US and other service providers may disclose your personal information in response to a search warrant or other legally valid inquiry or order (which may include lawful access by Canadian, US or other foreign governmental authorities, courts or law enforcement agencies), to other organizations in the case of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise required or permitted by applicable Canadian, US or other law.

# INFORMATION COLLECTED AUTOMATICALLY

**Visiting our Website:** We collect the IP (Internet protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity and to improve our Website.

**Using our App**: When you use our App, we collect information regarding your device type, operating system and version, carrier provider, unique device identifier, language setting, and the date and time that the App accesses our servers. We use this information to help us understand the activity on our App and to monitor and improve our App.

**Cookies:** Our Website uses a technology called "cookies". A cookie is a tiny element of data that our Website sends to a user's browser, which may then be stored on the user's hard drive so that we can recognize the user when they return. We use cookies to remember your preferences and to authenticate you. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Website, you may not be able to take advantage of all of the Website features.

#### **THIRD PARTY SITES**

Our Website or App may contain links to other websites that we do not own or operate. We provide links to third party websites as a convenience to the user. We do not have any control over such websites, and therefore we have no responsibility or liability for the way the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat personal information. We encourage you to read the privacy policy of every website you visit.

# **SECURITY OF PERSONAL INFORMATION**

We have implemented reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information in our custody and control, including policies and procedures governing our handling of personal information throughout its lifecycle. However, please note that no security measures can offer absolute security and we cannot guarantee that your personal information will not be stolen or accessed without authorization.

# **RETENTION OF PERSONAL INFORMATION**

Personal information is maintained on our servers or those of our service providers and is accessible by authorized employees, representatives and agents who require access for the purposes identified in this Privacy Policy. We have personal information retention policies and processes designed to retain personal information for no longer than necessary for the purposes for which such information was provided or to otherwise meet legal requirements.

#### **USE OF ARTIFICIAL INTELLIGENCE**

As part of our commitment to providing the Services, we may use artificial intelligence (AI) tools to assist in processing and analyzing personal information. These tools operate strictly within the scope of this Privacy Policy.

# **YOUR RIGHTS**

If you are a Practitioner, you may request access to or correction of your personal information (subject to limited exceptions prescribed by law) by submitting a written request to our Privacy Officer (see "Contact Us" below). You may also have the right, in specified circumstances, to withdraw your consent to our processing of your personal information, or to request a copy of

the information you have provided to us to use for your own purposes. If you have any questions about these rights, or you would like to exercise any of them, please contact us as described below. We will handle your request in accordance with our policies and may request certain personal information for the purposes of verifying your identity.

If you are a Patient, please contact your Practitioner to exercise any of your rights with respect to your Patient Personal Information.

# **UPDATES TO OUR PRIVACY POLICY**

This Privacy Policy may be updated periodically to reflect changes to our personal information practices. The revised Privacy Policy will be posted on our Website. We encourage you to refer to this Privacy Policy often for the latest information about our personal information practices.

# **CONTACT US**

Please contact our Privacy Officer at **privacy@mosaicanalytics.health** if you have any questions, comments or complaints about this Privacy Policy or our practices with respect to the handling of Practitioner Personal Information.

If you are a Patient, please contact your Practitioner for any questions with respect to the handling of your Patient Personal Information.