

Resolute Health Corporation Limited – Privacy Policy

Application of Policy

This Policy describes Resolute's (and its affiliates and subsidiaries, collectively "Resolute") management of information, including the purposes for which we collect, use and disclose information and the safeguards we use to protect information. This Policy does not apply to the collection, use, retention, disposal, destruction, and protection of information by Manufacturer's through the use of your PAP device. Manufacturers are subject to privacy legislation and professional requirements that govern their record keeping and management of information, regardless of the tools they use to collect, use, disclose and hold the information. Please direct any questions you have about how a Manufacturer will treat your information to the Manufacturer. For the purpose of this Policy the term "manufacturer" means the original equipment manufacturer of the PAP device.

What Personal Information Do We Collect?

PATIENT DATA

If you are a patient, you may provide personal information to us, for example, when you attend at our clinic to complete a sleep study or when you begin your therapy. We require information from your physician such as medical information relevant to treatment of obstructive sleep apnea or other sleep disorders or your medical condition(s). We may collect information like this from you in person, when you speak to one of our staff on the phone or via video, through our website, from the device manufacturer software, your insurance company or when you communicate with us in any way in connection with the products and services we are providing. The information we collect will only be shared amongst Resolute personnel (including our employees, contractors and subcontractors), who have a need to know and access the information for the purpose, or in the course, of providing our products and services and to perform their designated functions.

You are not obligated to provide us with any information or participate in any of the products or services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily. If, however, you are unwilling to provide us with certain requested information, please understand that this may limit our ability to provide our products and/or services to you.

The information we may collect for all patients typically includes:

Contact details: such as your name, street address, e-mail address, postal address, and telephone number.

Identification data: such as date of birth, gender, age, marital status, photograph, national origin, driver's license and other government-issued identification or provincial health number.

Background information: such as employment history, notes about your consultations with us, educational history, professional qualifications, and other skills and activities.

Lifestyle preferences and personality profile: such as sleep patterns, community involvement, hobbies, and social activities.

Health information: such as health and medical information (i.e., symptoms, prescriptions, other medical conditions you may be experiencing) your physician or you may share with us to assist in the provision of therapeutic products and services.

Financial information: such as financial account information (i.e., bank account, credit card number) to charge you for the products and services we provide and insurance provider information to confirm details required for reimbursement coverage.

Other information: such as your prior and current PAP device serial number and any other information you may choose to share with us.

MANUFACTURER DATA

Information Manufacturers provide to us, and we provide to them: your ongoing and consistent use of the products and services we provide is critical to successful therapy. To ensure an optimal therapeutic experience we and the manufacturer have access to data from the PAP device that allows us to assess the quality and progression of your treatment.

How Do We Use Your Personal Information?

We may use the personal information we collect in several ways.

PATIENT DATA:

We typically use Patient data for the following purposes:

Assessment: to ensure that we completely understand your current situation and whether or not you have obstructive sleep apnea and, if so, the severity.

Monitoring: to ensure that you are receiving the optimal therapeutic experience to treat your obstructive sleep apnea or other sleep disorder. We may also use your personal information for other business purposes such as data analysis, identifying usage trends, creating anonymized data sets for research, statistics and analytics purposes, creating knowledge pieces, determining the effectiveness of our products and/or services, and/or to enhance, customize, and improve our treatment plans, products and services.

Where some of this information is considered 'sensitive' personal information, we will apply stricter data protections. Where required by law, we will obtain your explicit consent before we use this information.

Marketing Activities: to send you information (such as reports, promotions, research, white papers, and event invitations) that we think you may find interesting or beneficial (in each case, where this is in accordance with your marketing preferences).

MANUFACTURER DATA:

We typically use Manufacturer Data: (i) to store (and update when necessary) your details in our database (including adherence and usage data related to your PAP device) so that we can contact you in relation to your treatment, for the purposes of providing you with equipment and services; (ii) to send you information about our services, promotions, research, and any other information we believe you may find useful as it pertains to your use of a PAP device; (iii) to perform certain legal obligations; and (iv) to help us target appropriate marketing campaigns.

DATA COLLECTED VIA OUR WEBSITE

This Section applies to personal information that we collect and process through our website in the usual course of our business, such as scheduling appointments, answering your questions, selling/promoting our products and/or services and marketing activities.

What Personal Information Do We Collect?

Information you provide to us: Certain parts of our website may ask you to provide personal information voluntarily, for example, we may ask you to provide your contact details (like your name, email address, and phone number) to complete surveys, subscribe to marketing communications (like newsletters), submit inquiries, and/or otherwise communicate or interact with us.

We may also collect personal information from you offline, such as when you attend one of our events. You are not obligated to provide us any information or participate in any of the services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily. If, however, you are unwilling to provide us with certain requested information, please understand that this may limit your ability to participate in the services.

Information we collect automatically: When you visit our website, we may collect certain information automatically from your device. Such automatically collected information may include your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g., city-level location) and/or other technical information. We may also collect information about how your device has interacted with our website, including the pages or content accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology.

Social Media Widgets: Our website includes social media features, such as social media widgets that link to a social media website or allow you to share website content. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the feature to function properly. Social media features, such as widgets, are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

How Do We Use Your Personal Information?

We typically use the personal information we collect through our website in the usual course of our business for the following reasons: (i) to respond to a request that you sent us, such as a request for information about our products or services; (ii) to inform you about general matters related to treatment; (iii) to administer, protect, and improve our website and our services; (iv) to better understand the preferences of our website visitors; (v) to compile aggregated statistics about website usage; (vi) to provide you with marketing and promotional communications (where this is in accordance with your marketing preferences); (vii) for other business purposes

such as data analysis, identifying usage trends, determining the effectiveness of our marketing, and enhancing, customizing and improving our websites, products and services; and/or (viii) to authenticate you as a user of our website and to personalize your experience.

Cookies and Similar Tracking Technology

Like many websites, we use cookies or other similar technologies to collect and use personal information about you.

Links to Third Party Websites

Resolute's websites may contain links to websites that we do not own or operate. The provision of these links is not an endorsement of or referral to the linked websites. We provide the links solely for your convenience. We strongly encourage you to review the privacy policies and terms of use applicable to any site you visit. This Policy does not apply to linked sites or pages, and we are not responsible for the content or privacy practices applicable to them or used by their operators.

GENERAL INFORMATION

How We Share Your Information

We may share your personal information in the following ways.

We share your information within Resolute operations (including our group of clinics and the clinical staff within those clinics). Your information is maintained on our corporate database and associated software, which is secure and accessible only to our employees across our business.

We may share your information with any medical professional who we understand is assisting in the treatment of your obstructive sleep apnea or other sleep disorder.

We may share your information with a competent regulatory or government agency, court or other third party where we believe disclosure is necessary as a matter of applicable law or regulation.

In the case of a Manufacturer or other third-party service provider, we may share your information with those who will need to access or process your information for the purposes we have described herein.

We may share your information with a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Policy.

We may share your information with our marketing partners to send emails on our behalf.

We may share information with any other person with your consent.

Please be assured that we do not use your information for purposes that are incompatible with those set forth in this Policy.

International Data Transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different from the laws of Canada (and, in some cases, may not be as protective).

Specifically, the manufacturer of your PAP device may have servers that are located outside of Canada. This means that when we collect your personal information it may be held on servers outside of Canada.

Your Data Protection Rights

You have the following data protection rights:

If you wish to access, correct, update, or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below. Consistent with applicable law, when asked to remove a record from our database, we will retain minimal personal information in order to prevent future contact and to keep a record of the information previously disclosed.

You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by letting us know of your preference by contacting us as outlined below.

Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you withdraw your consent, we will no longer follow up with you about your therapy or ongoing care and will consider our patient relationship with you at an end.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Consistent with applicable law, we do not discriminate against individuals for exercising their legal rights with respect to their personal information.

How Long Do We Keep Your Personal Information?

We will retain information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with our products or services or to assist your ongoing therapy).

If you have any questions about how long we retain your personal information, you may contact us using the contact details provided below.

How Do We Keep Your Personal Information Secure?

We take appropriate technical and organizational measures to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction. The measures

we use are designed to provide a level of security appropriate to the risk of processing your personal information and to help ensure that your data is safe, secure, and only available to you and to those with authorized access. If you have any questions about the security of your personal information, you may contact us using the contact details provided below.

Notwithstanding the safeguards we employ and our commitment to protecting information, we cannot guarantee the security or error-free transmission or storage of information. There are risks inherent in the use of electronic means to transmit and hold information in electronic format. These risks can be minimized but not eliminated using appropriate security measures, such as the measures Resolute employs. These risks include interception, loss, corruption, unauthorized access to, use and disclosure of information, and delay in the availability of information.

How To Contact Us

Please feel free to contact us with any comments, questions, complaints, or suggestions you might have regarding the information or practices described in this Policy.

You may contact us by sending a message to privacy@resolutehealthcorp.com. You can also write to us using the details below:

Resolute Health Corporation Limited
Suite 208 – 120 Western Parkway
Bedford, Nova Scotia
B4B-0V2
Attention: Resolute Privacy Officer

Please check to see if we have amended our Privacy Policy since you last accessed it to ensure you are aware of (and agree to) our current privacy practices.