

Privacy Policy

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INTRODUCTION

Akitu Inc. (“**Company**” or “**We**”) respects your privacy and is committed to protecting it by complying with this policy.

This policy describes:

- How we collect, use, disclose, and protect the personal information of our customers, website users, and users of our services (“**you**”).
- The types of information we may collect from you or that you may provide when you visit the website akituone.com (our “**Website**”) or purchase, download, install, register with, access or use our services (collectively with Website, the “**Services**”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your personal information in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Privacy laws in Canada generally define “personal information” as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person. Personal information does not include business contact information, including your name, title, or business contact information. “Personal health information” can include information about an individual’s mental or physical health, health services provided to an individual, and an individual’s health number.

This policy applies to information we collect, use, or disclose about you:

- Through the Services.
- In email, text, and other electronic messages between you and the Services.
- Through software you download from the Services.
- When you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this policy.

The Services may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

This policy DOES NOT apply to information that you provide to or is collected by any third party. Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of the Services after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates. We will notify you in advance of any material changes to this policy and obtain your consent to any new ways that we collect, use, and disclose your personal information.

PERSONAL HEALTH INFORMATION

Customers of our Services generally are “health information custodians” as defined in applicable health privacy legislation, including the *Personal Health Information Protection Act, 2004*. To the extent that any personal health information is transmitted to us, we are bound by the confidentiality and security requirements related to the disclosure of personal health information contained in applicable laws and our Cloud Services Agreement.

HOW WE USE PERSONAL HEALTH INFORMATION

The personal health information of your patients may be used or accessible to us for one or more of the following specific purposes:

- to convert your patient data into a format compatible for use with the Services;
- to provide support services on an as-needed basis, and assist you with any technical difficulties they may experience when using the Services;
- to securely host and maintain patient data on your behalf, if hosting services are offered or required;
- to provide secure back-up services to you as requested;
- to meet any legal and regulatory requirements that are imposed upon us from time to time, or to bring or defend against legal actions;
- if we reasonably believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others; or
- for such other reasonable purposes for which you provide consent or as permitted or required by law.

INFORMATION WE COLLECT ABOUT YOU

We collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, e-mail address, telephone number, date of birth, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, billing and account information, and any other identifier we may use to contact you ("**personal information**").

We provide an opportunity for any user to unsubscribe from our commercial electronic messages for marketing purposes on an ongoing basis by using the unsubscribe mechanism at the bottom of our e-mails.

- **Business-related information**, namely information that related to your business duties, including:
 - title;
 - duties;
 - business address;
 - business email address; and
 - business telephone number.
- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as, demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Website feature.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Services, and usage details.
- **Non-personal details about your interactions with Services**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Services (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call our customer service number.

HOW WE COLLECT INFORMATION ABOUT YOU

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us by phone, email, or otherwise.

- **User contributions.** You may also provide information for us to publish or display on public Website areas or transmit to other Website users or third parties.
- **Automated technologies or interactions,** as you navigate through our Services. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- **Third parties or publicly available sources,** for example, our business partners, or your third party providers when you login or connect from an account administered by a third party provider.

Information You Provide to Us

The information we collect directly from you on or through our Services may include:

- Information that you provide by filling in forms on our Services. This includes information provided at the time of registering to use our Services, subscribing to our service, or requesting further services. We may also ask you for information when you report a problem with our Services.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Services and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Services.
- Your search queries on the Services.

Information We Collect Through Cookies and Other Automatic Data Collection Technologies

As you navigate through and interact with our Services, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We may also use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). To learn more or to opt-out of tailored advertising please visit Digital Advertising Alliance of Canada Opt-Out Tool for information on how you can opt out of behavioral tracking on our Website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically is statistical information and may include personal information, and we may maintain it or associate it with personal information we collect in other ways, that you provide to us, or receive from third parties. It helps us to improve our Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Services.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services.
- **Flash Cookies.** Certain features of our Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Services. Flash cookies are not managed by the same browser settings that are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).
- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Services and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To provide you with notices about your subscription, including expiration and renewal notices.

- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Services or any products or services we offer or provide through it.
- To improve our Services, products or services, marketing, or customer relationships and experiences.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you, as permitted by law. If you do not want us to use your information in this way, please use the unsubscribe mechanism at the bottom of our email or email contact@akituone.com. For more information, see [Choices About How We Use and Disclose Your Information](#).

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Akitu Inc.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Akitu Inc. about our customers and users is among the assets transferred.
- To advertisers and advertising networks that require the information to select and serve relevant advertisements to you and others. We do not disclose data about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 400 women between 30 and 45 have clicked on their advertisement on a specific day). We may also use such aggregate information to help advertisers target a specific audience (for example, men in a specific location). We may make use of the personal information we have collected from you to enable us to display our advertisers' advertisement to that target audience.

- To third parties to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them. For more information, see [Choices About How We Use and Disclose Your Information](#).
- To contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with improvements to the Services and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply our Cloud Services Agreement located at www.akituone.com/terms-and-conditions and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Akitu Inc., our customers, or others.

TRANSFERRING YOUR PERSONAL INFORMATION

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with improvements to the Services and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

You are welcome to contact us to obtain further information about Company policies regarding service providers outside of Canada. See [Contact Information and Challenging Compliance](#).

By submitting your personal information or engaging with the Services, you consent to this transfer, storage, or processing.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this Website may not be accessible or may not function properly. For more information about tracking technologies, see [Information We Collect Through Cookies and Other Automatic Data Collection Technologies](#).
- **Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email stating your request to contact@akituone.com.
- **Promotional Offers from the Company.** If you have opted in to receive certain emails from us but no longer wish to have your email address used by to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to contact@akituone.com. If we have sent you a promotional email, you may unsubscribe by clicking the unsubscribe link we have included in the email. This opt-out does not apply to information provided to the Company as part of a product purchase, product service experience, or other transactions.

DATA SECURITY

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us behind firewalls on our secure servers. Any payment transactions will be encrypted.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Personal Health Information of Your Patients

The Services include numerous built-in controls to protect personal health information of your patients. Specifically, we are obligated to provide the following safeguards:

- **Secure Hosting:** The Services are hosted in a secure environment with effective security safeguards in place in compliance with industry best practices.
- **Authorized Users' access** to the Services must be authorized by you in accordance with an established user management process.
- **Authentication:** All Authorized Users are authenticated through an enhanced authentication mechanism prior to accessing the Services. Strong password policy is enforced in the Services.
- **Data Security:** Software data is encrypted in storage and in transit. Customer data cannot be changed or modified by any external users. Data retention and disposal policies and procedures are in place to ensure the availability and confidentiality of customer data.
- **Logging:** Privacy and security related events and activities such as access to personal health information and administrative actions may be logged. Our audit logs are reviewed by our privacy officer on a regular basis to detect suspicious activities or potential security breaches. We recommend that you maintain and review logs on a regular basis to detect suspicious activities or potential privacy breaches.
- **Security Assessment:** Threat Risk Assessments (TRAs) are conducted to identify security gaps and deficiencies which we mitigate appropriately to ensure compliance. Penetration testing is performed to prevent any unauthorized access and modification to the Services and the data.
- **Privacy:** Privacy Impact Assessments (PIAs) are conducted to identify privacy gaps and deficiencies which are mitigated appropriately to ensure compliance. We have implemented and followed information practices that comply with PHIPA regarding the collection, use and disclosure of personal health information.

DATA RETENTION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

CHILDREN UNDER THE AGE OF 13

Our Services are not intended for children under 13 years of age. No one under age 13 may provide any information to the Services. We do not knowingly collect personal information

from children under 13. If you are under 13, do not use or provide any information on the Services or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at contact@akituone.com.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

If you want to review, verify, correct, or withdraw consent to the use of your personal information you may also send us an email at contact@akituone.com to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions include:

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that is about another individual that would reveal their personal information or confidential commercial information.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct the information provided, you may contact our Privacy Officer.

WITHDRAWING YOUR CONSENT

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at contact@akituone.com.

Please note that if you withdraw your consent we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account.

We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes. Your continued use of our Services after any update indicates your knowing consent to the terms of our privacy policy in effect on the date of your use.

CONTACT INFORMATION AND CHALLENGING COMPLIANCE

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

Privacy Officer

2010 Winston Park Drive, Oakville, Ontario, Canada, L6H 5R7

contact@akituone.com

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our Privacy Officer using the contact information listed above.