

rEVEN AI Privacy Policy

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1 Purpose

rEVEN AI is in the business of delivering solutions that enable and accelerate collaboration between all those involved in a patient's care which may include the electronic transmission of Personal Information between different stakeholders for a very specific purpose. rEVEN AI deems protection of Personal Information of its customers and employees to be of paramount importance. Our commitment to safeguard individuals' right to privacy in compliance with applicable privacy legislations and contractual requirements is of significant importance to rEVEN AI and is critical to justify our leading role of powering business interactions in North America.

rEVEN AI's privacy practices were developed in accordance with the applicable privacy legislations, which are in accordance with the principles set out in the National Standard of Canada entitled Model Code for the Protection of Personal Information.

This rEVEN AI Corporate Privacy Policy (the "rEVEN AI Privacy Policy") outlines the responsibilities of SPAI AI Inc. and its affiliates (collectively "rEVEN AI") and rEVEN AI's employees (which includes consultants and temporary hires whose duty require access to Personal Information) concerning the protection of Personal Information of rEVEN AI's customers and rEVEN AI's employees.

2 Scope

The scope and application of the rEVEN AI Privacy Policy are as follows:

- The rEVEN AI Privacy Policy applies to Personal Information made available to rEVEN AI by our customers and Personal Information of rEVEN AI employees that is collected, used and/or disclosed by rEVEN AI (it being understood that rEVEN AI's business is almost exclusively focused on

delivering solutions to corporate customers, who in turn provide services to individual customers)

- The rEVEN AI Privacy Policy applies to the management of Personal Information in any form whether oral, electronic or written.
- The application of the rEVEN AI Privacy Policy is subject to the requirements or provisions of any applicable legislation, regulations, agreements or the ruling of any court or other lawful authority.

3 Definition of Personal Information

Personal Information means information about an identifiable individual (which includes personal health and financial information) but not aggregated information that cannot be associated with a specific individual.

For a customer, such information includes an individual's diagnostic, health history, treatment and care information, payment or eligibility for health care information, credit information, bank information, credit and debit card numbers, mortgage information.

For an employee, such information includes information found in personal employment files, performance appraisals, medical and benefits information.

4 Privacy Principles

A) ACCOUNTABILITY

rEVEN AI is responsible for Personal Information under its control and shall designate one or more persons who are accountable for rEVEN AI's compliance with the following principles.

rEVEN AI has designated the Chief Privacy Officer to oversee compliance with the rEVEN AI Privacy Policy.

The Chief Privacy Officer can be contacted at:
Privacy@rEVEN.ca.

To that effect, rEVEN AI has implemented policies and procedures to give effect to rEVEN AI Privacy Policy, including:

- a) rEVEN AI employees undergo privacy training to ensure continued compliance with applicable laws (including the rEVEN AI Privacy Policy) and awareness.
- b) implementation of security standards through the rEVEN AI Corporate Information Security Policy; which policy outlines the minimum security requirements for rEVEN AI systems or network, including technical security requirement and procedures to protect Personal Information that may be accessible via such systems or network;
- c) rEVEN AI's contractual practices require inclusion of appropriate privacy provisions into customers and third party provider agreements when Personal Information is either collected, used and/or disclosed.
- d) rEVEN AI employment agreement include contractual provisions for the safeguard and proper usage of confidential information (which may include Personal Information) made available by our customers in the course of their employment.
- e) On a annual basis, rEVEN AI employees sign the rEVEN AI Code of Business Conduct (which includes the rEVEN AI Privacy Policy) which again reiterates the requirements for the safeguard and proper usage of Personal Information.
- f) procedures to receive and respond to inquiries or complaints;

rEVEN AI is responsible for Personal Information within its custody or control, including information that has been transferred to a third party for

processing. rEVEN AI shall use appropriate means to provide a comparable level of protection while information is being processed by a third party.

rEVEN AI shall make known, upon request, the title of the person or persons designated to oversee rEVEN AI's compliance with the rEVEN AI Privacy Policy.

rEVEN AI has designated the Chief Privacy Officer to oversee compliance with the rEVEN AI Privacy Policy. The Chief Privacy Officer can be contacted at: Privacy@rEVEN.ca.

B) IDENTIFYING PURPOSES FOR COLLECTION OF PERSONAL INFORMATION

rEVEN AI shall identify the purposes for which Personal Information is collected at or before the time the information is collected.

rEVEN AI collects Personal Information for the following purposes:

- a) For the provision of products and services to its customers (in compliance with contractual obligations);
- b) To manage and develop its business and operations, including personnel and employment matters; and
- c) To meet legal and regulatory requirements.

rEVEN AI shall use reasonable efforts to ensure that a customer or employee is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the customer or employee (for example in the contractual agreement).

Unless required by law, rEVEN AI shall not use or disclose, for any new purpose, Personal Information that has been collected without first identifying and documenting the new purpose and obtaining the consent from the customer (either corporate or individual, as the case may be) or the employee, as the case may be.

Employees who are collecting Personal Information from customers should ensure that such customers are advised of the purposes for which Personal Information will be used or disclosed.

C) OBTAINING CONSENT FOR COLLECTION, USE OR DISCLOSURE OF PERSONAL INFORMATION

The knowledge and consent of a customer or employee are required for the collection, use or disclosure of Personal Information, except where inappropriate as determined by applicable legislation.

rEVEN AI shall seek consent (generally from our corporate customer or employee and, exceptionally from the individual directly) to use and disclose Personal Information for the identified purposes at the same time it collects the information.

rEVEN AI will require customers to consent to the collection, use or disclosure of Personal Information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill the identified purposes.

In determining the appropriate form of consent, rEVEN AI shall take into account the sensitivity of the Personal Information and the reasonable expectations of its customers and employees.

The acceptance of employment and/or benefits by an employee constitutes consent for rEVEN AI to collect, use and/or disclose Personal Information for all identified purposes (which includes personnel and employment management, benefits and compensation management and as required by law).

A customer or employee may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice.

When employees are collecting Personal Information (either directly from an individual to whom the Personal Information belongs or from our corporate customers), the employees must communicate with the rEVEN AI Law Department to ensure that proper

consents) have been obtained prior to the collection, use and/or disclosure.

D) LIMITING COLLECTION OF PERSONAL INFORMATION

rEVEN AI shall limit the collection of Personal Information to that which is necessary for the purposes identified by rEVEN AI at the time of collection.

rEVEN AI collects Personal Information primarily from its corporate customers (who are generally not the individuals to whom the Personal Information belongs but represent to rEVEN AI that they have obtained appropriate rights from such individuals to disclose the Personal Information to rEVEN AI and third party providers, if any) and employees.

To that effect rEVEN AI ensures to collect, either from the corporate customer or the employee (as the case may be), only the Personal Information that is required to fulfill the purposes identified at the time of collection (either the services performed as per the terms of the contractual agreement or for employment and benefit purposes).

Employees who collect Personal Information (either directly from an individual to whom the Personal Information belongs or from our corporate customers) must ensure that they ONLY collect is what is needed to fulfill the purposes (in case of doubt- please communicate with the rEVEN AI Law Department to ensure that collection is conducted in compliance with laws and/or contractual rights and obligations).

E) LIMITING USE, DISCLOSURE AND RETENTION OF PERSONAL INFORMATION

rEVEN AI shall not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the customer (either corporate or individual) or the employee or as required by law.

rEVEN AI may only disclose customer's Personal Information as permitted pursuant to the terms and conditions of the contractual agreement with such customer (with the proper contractual agreement in place with such third party to whom Personal Information may be disclosed) or as required by law.

rEVEN AI may disclose Personal Information about its employees:

- a) for normal personnel and benefits/compensation administration;
- b) security clearance/credit checks (if required by the job position) and emergencies;
- c) to meet legal requirements;
- d) when authorized by the employee or former employee

rEVEN AI shall keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law.

Only those employees of rEVEN AI who require access for business reasons, or whose duties reasonably so require, are granted access to Personal Information about customers and employees.

F) ACCURACY OF PERSONAL INFORMATION

Personal Information used by rEVEN AI shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a customer or employee (it being understood that whenever Personal Information is provided by the corporate customer to rEVEN AI directly, as opposed to, by the individual to rEVEN AI directly; rEVEN AI must contractually rely on the corporate customer to ensure that such information is accurate, complete and up-to-date).

rEVEN AI shall update Personal Information about customers and employees upon notification by the customer or employee, as the case may be.

While most Personal Information of employees is obtained when an employee joins rEVEN AI, the responsibility for updating Personal Information rests with each employee. Each employee has the right to correct any inaccurate or incomplete information contained in his/her personnel file.

Personal Information in our custody shall be accurate, complete and up-to-date as is necessary for the purposes for which it was collected. rEVEN AI employees are responsible for updating their own Personal Information with rEVEN AI.

G) SECURITY SAFEGUARDS

rEVEN AI shall, using commercially reasonable efforts and in compliance with the rEVEN AI Corporate Information Security Policy (which policy, among other things, outlines the minimum security requirements for rEVEN AI networks and systems), protect Personal Information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, using security measures appropriate to the sensitivity of the information. rEVEN AI shall protect the information regardless of the format in which it is held.

rEVEN AI shall protect Personal Information disclosed to third parties by contractual agreements stipulating, among other things, the confidentiality of the information and the purposes for which it is to be used.

All employees of rEVEN AI with access to Personal Information are required as a condition of employment to respect the confidentiality of Personal Information.

rEVEN AI shall protect Personal Information by security safeguards appropriate to the sensitivity of the information.

H) OPENNESS CONCERNING POLICIES AND PRACTICES

Personal Information in question any amended information or the existence of any unresolved differences.

rEVEN AI shall make information about its policies and practices accessible and easy to understand. In addition, rEVEN AI shall, upon request, provide the title and address of the person or persons accountable for rEVEN AI's compliance with this policy and to whom inquiries or complaints can be forwarded.

rEVEN AI shall make available information to help customers and employees exercise choices, if any, regarding the use of their Personal Information.

rEVEN AI shall make readily available to customers and employees specific information about its policies and practices relating to the management of Personal Information.

I) ACCESS TO PERSONAL INFORMATION

Upon written request, rEVEN AI shall inform a customer or employee of the existence, use and disclosure of his or her Personal Information and shall provide a reasonable opportunity for the customer or employee to review the relevant Personal Information in the individual's file. Personal Information shall be provided in understandable form within a reasonable time and at minimal or no cost to the individual.

In certain situations, rEVEN AI may not be able to provide access to the Personal Information that they hold about a customer or employee. For example, rEVEN AI may not provide access to information if doing so would likely reveal Personal Information about a third party, could reasonably be expected to threaten the life or security of another individual and/or would be prohibitively costly.

Also, rEVEN AI may not provide access to information if disclosure would reveal confidential commercial

information, if access could jeopardize the security of other information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If access to Personal Information cannot be provided, rEVEN AI shall provide the reasons for denying access upon request.

rEVEN AI shall promptly correct or complete any Personal Information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, rEVEN AI shall transmit to third parties having access to the

A customer or employee shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Upon written request, rEVEN AI shall inform a customer or employee of the existence, use and disclosure of his or her Personal Information.

J) CHALLENGING COMPLIANCE

rEVEN AI shall maintain procedures for addressing and responding to all inquiries or complaints from its customers and employees about rEVEN AI's handling of Personal Information.

The Chief Privacy Officer may seek external advice where appropriate before providing a final response to individual complaints.

rEVEN AI shall investigate all complaints concerning compliance with this policy. If a complaint is found to be justified, rEVEN AI shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A customer or employee shall be informed of the outcome of the investigation regarding his/her complaint.

Employees should address their personal queries or complaints to the Chief Privacy Officer and should provide, upon request by a customer, the contact information of rEVEN AI Chief Privacy Officer to address any questions or complaints of customers concerning their Personal Information within rEVEN AI's custody or control.

5 Reminder of Our Responsibilities

In addition to the foregoing, you will find below a non-exhaustive list of physical, technical and administrative practices to be employed (or not to be employed) by all employees to ensure proper usage and safeguard of Personal Information within rEVEN AI's custody:

- ☐ Maintain the confidentiality of the Personal Information you are required to have access to in the context of your work;
- ☐ Protect electronic and paper documents containing Personal Information with proper security safeguards, including: locked cabinets, password protected screen savers, unique user ID.
- ☐ Ensure that your access and usage of Personal Information is limited to information you need to know to perform our work and to provide services to our customers.
- ☐ Apply "clean desk policy";
- ☐ Ensure that all documents (electronic or paper) containing Personal Information are shredded or properly deleted when no longer needed.
- ☐ Use unique user ID and password for those who need to know (and tracking functionalities);
- ☐ Do not store Personal Information on shared drive;
- ☐ Do not send Personal Information over the internet;
- ☐ Do not use real (live) data of customer for demonstration and/or within development or staging environment (unless customer has consented to such usage)
- ☐ Never disclose Personal Information to a third party unless expressly agreed to by the customer or the employee to whom such information belongs (which includes depersonalization of all reports containing Personal Information that are to be sent to third parties)
- ☐ Never obstruct a complaint investigation or an audit made by a privacy commissioner.