

Privacy at INSIG

Updated: February 22, 2022

INSIG Corporation (“Insig”, “us” or “we”) and our parent company WELL Health Technologies Corp. (“WELL”) are proud to offer you the Insig webpage (the “Webpage”) and the associated Insig Virtual Care platform (the “Platform”). Insig is committed to protecting your personal information and complying with applicable data protection and privacy laws. This “Privacy Policy” tells you how we do so.

THIS PRIVACY POLICY DOES NOT APPLY TO THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION BY HEALTH CARE PROFESSIONALS, INCLUDING PHYSICIANS, PHYSICIAN ASSISTANTS, AND THERAPISTS (“HCPS”) WHO USE THE PLATFORM TO PROVIDE INDIVIDUALS WITH TELEHEALTH OR TELEMEDICINE SERVICES (“HEALTH SERVICES”) OR ASSISTING WITH THE PROVISION OF SERVICES (“SUPPORT SERVICES”), NOR DOES IT COVER THIRD-PARTY LICENSORS WHO LICENSE THE PLATFORM. HCPS ARE SUBJECT TO THEIR OWN RESPECTIVE PRIVACY LAWS AND PROFESSIONAL REQUIREMENTS THAT GOVERN HOW THEY COLLECT, USE AND DISCLOSE PERSONAL INFORMATION. THIRD PARTY LICENSORS WILL HAVE THEIR OWN PRIVACY POLICY WITH RESPECT TO THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION. WE ENCOURAGE YOU TO READ THEIR RESPECTIVE PRIVACY POLICIES TO UNDERSTAND HOW YOUR PERSONAL INFORMATION (INCLUDING YOUR PERSONAL HEALTH INFORMATION) MAY BE COLLECTED, USED AND DISCLOSED.

We will update this Privacy Policy as necessary. Please check it regularly.

1. What information do we collect?

Webpage - Cookies

Unless you opt-out, our website uses “Cookies” and other automatic data collection technologies with your consent to collect personal information whenever you visit or interact with the Webpage, including unique identifiers and preference information such as IP address, technical usage, browser type, time zone settings, language preferences, operating system, unique device identifiers, search history, page response times and length of visit, pages viewed, marketing preferences or navigation and clickstream behavior for online interactions.

These Cookies helps us understand how you use the Webpage and the content of the Webpage in order to make improvements. We also may use these Cookies to promote our services through marketing and advertising. These Cookies may be accessed or disclosed to third-parties for the purpose of serving you relevant advertisements.

You can opt-out of Cookies or prevent third-party websites from accessing our Cookies through the privacy settings on your browser. However, opting-out of our Cookies may disable some of the Webpage’s features, and may prevent us from providing you with the information and services you have requested.

Webpage - Contact-Us (online form, chat box, or e-mail)

When you submit a form on the Webpage, use our customer service chat messenger, or e-mail us with a question, we will collect personal information about you like your name, e-mail, phone number, and company name. This information will be used by Insig to communicate with you, provide you with the information you requested, and conduct appropriate follow-up.

Webpage - Direct marketing

If you sign up to receive direct marketing or promotional communications from Insig, we will collect your name and e-mail to inform you about Insig and the associated products and services. If you sign-up to receive

newsletters or request additional information about WELL, we will share your name and e-mail address with WELL so they can provide you with the information you requested.

Platform – HCP Account Creation

When a HCP or an individual registers a medical practice or group to use Insig's services, we will collect personal information about the individual submitting the form, like name, e-mail, and phone number, and information about the medical practice, like its name, address and contact details. This information will be used by Insig to create an account for the HCP and their group practice ("HCP Account"), confirm identities in the future, and to contact the individual with respect to the medical practice's use of the Platform.

Platform – Patient Account Creation

When an individual registers as a patient on the Platform to access Health Services with their HCP, we will collect their name, e-mail address, phone number, gender, date of birth, province/territory/state of residence, healthcare card, and credit card information or other billing information. This information will be used to create a user account for the individual ("User Account") and will be used to facilitate payment. We do not store any credit card information as all payment processing is done by Stripe and is not stored with us.

The Health Services and Support Services are also available for use by children at the discretion of the HCP. For all patients under the age of 18, the holder of the User Account must be the patient's parent or legal guardian. The parent or legal guardian may be asked to provide personal information about the minor in order to register them to use the User Account ("Registered Child").

Platform – Patient Visits

The Platform helps facilitate telehealth or telemedicine visits between patients and HCPs. HCPs are governed by their own privacy policies with respect to the collection, use and disclosure of personal information.

Through the use of the Platform, HCPs may collect and use personal health information about the patient. HCPs may collect personal health information verbally or by text, including: the reason for the patient's consultation request, relevant health history, present condition or symptoms and current treatments. This information is collected by the HCP to provide the Health Services and /or Support Services. The HCPs may log this personal information about the visit to the relevant User Account. Such information may be saved to the User Account so it can be referred to in the future by them or by other HCPs.

In order to facilitate the delivery of Health Services and/or Support Services with HCPs and assist patients connecting with a HCP, Insig will collect some personal information (including personal health information) and save the information to the relevant User Account, which may be accessed by HCPs.

Questionnaires

HCPs or third-party licensors may utilize Insig questionnaires to collect personal information, including personal health information, from patients and individuals on a variety of different topics and subjects. This information is collected to either facilitate the delivery of specific Health Services, or is used by HCPs for research purposes. The collection, use and disclosure of this personal information is also governed by the HCP's or third-party licensor's own privacy policy.

2. Why do we use personal information?

We use your personal information to:

- manage our relationship with you and provide you with the information or services you request,
- create a HCP Account for HCPs interested in providing Health Services or Support Services through the Platform,

- create a User Account for patients interested in receiving Health Services or Support Services through the Platform,
- facilitate the delivery of Health Services or Support Services to patients by HCPs using the Platform;
- conduct research and evaluate development on the Webpage, including analyzing testing data to improve our services,
- communicate with you regarding inquiries for information or customer service request or employment opportunities,
- detect, prevent or investigate security breaches,
- process insurance, credit card or other payment information as agreed to on the Webpage or through the use of the Platform,
- protect our business, and
- maintain appropriate records for internal administrative purposes.

Insig reserves the right to aggregate and anonymize personal information (including personal health information) stored on its system and use such aggregated information as it sees fit.

3. Who do we share the personal information with?

We may share some of your personal information, including personal health information, with third-party service providers in order to operate the Webpage, the Platform or to provide you with the information you request. We only use service providers that ensure a comparable level of protection for your information, as provided in this Privacy Policy. Our contracts with our service providers ensure they comply with that obligation and use your personal information only for the services requested.

Exceptionally, we may collect, use or disclose personal information without your consent in the following limited circumstances:

- when the collection, use or disclosure of personal information is permitted or required by law or by regulatory proceedings,
- in an emergency that threatens an individual's life, health, or personal security,
- when we require legal advice from a lawyer,
- to protect ourselves from fraud,
- to a collection agency in order to collect our unpaid accounts, or
- to investigate an anticipated breach of an agreement or a contravention of law.

If we merge with another business, we will inform you of any impact on your personal information.

Webpage

We only share your personal information with service providers, including our affiliates, in order to operate the Webpage. This includes potentially sharing your personal information for:

- providing requested services or information,
- operating and optimizing the Webpage, or

- customer service.

Platform

4. How long do we keep personal information?

We retain personal information for as long as required to provide the services for which it was collected, otherwise, in accordance with applicable legal and regulatory requirements.

HCPs are subject to their own regulatory and professional rules which require them to retain personal health information, including personal health information they collected on the Platform, for a minimum length of time. Please consult their privacy policy to understand how long they will retain your personal information.

5. How do we keep personal information accurate?

We take reasonable steps to ensure that any personal information in our custody is accurate and up-to-date but we mostly rely on you to notify us of any changes to personal information you provided us.

6. How do we protect your personal information?

We use reasonable and appropriate physical, administrative and technical measures (including encryption) designed to help you secure your personal information against accidental or unlawful loss, access or disclosure. Only staff and service providers who have a legitimate business purpose for accessing the personal information collected by us are authorized to do so. Unauthorized use of personal information by anyone affiliated with Insig or WELL is prohibited and constitutes grounds for disciplinary action.

HCPs and other third-party licensors who utilize the Platform will have their own security policies and procedures to manage individual's personal information (including their personal health information). We recommend that patients read the HCP or third-party licensor's privacy and security policies to understand how they protect patient information.

Even though we take all necessary steps to protect your personal information, security breaches cannot be eliminated and we cannot guarantee no breach will ever occur.

7. Where do we store personal information?

All personal information we collect is stored on secure servers in Canada.

However, personal information processed by our third-party service providers may be done outside of the jurisdiction where the data is stored. While being processed in another jurisdiction, such personal information is subject to that jurisdiction's laws, which may permit governmental authorities the right to access your personal information.

Further, HCPs and other third-party licensors who utilize the platform will have their own data retention policies and may be required to store your personal information outside of the Platform. This may be done on systems and databases which store information in different jurisdictions in which you reside. We recommend that patients reach out to their HCP or third-party licensors to understand where they store patient information.

For more information on our service providers or where we store personal information, contact us at info@insighealth.com.

8. Links to third-party sites

Our Platform is also used by HCPs and third-party licensors. In addition, our Webpage may lead you to third-party websites, including websites advertising other products or services. These HCPs, third-party licensors and websites are separate and distinct from Insig and WELL and have their own separate privacy policies. We are not responsible in any way for how any HCP, third-party or website collects, uses or discloses your personal information, so it is important to familiarize yourself with the privacy policies before providing your personal information to them.

9. Direct marketing

You may sign up to receive marketing or promotional communications from WELL. Where you have expressly consented, we may use your personal information to inform you about us and our products and our services, including promotional offers and events.

If you no longer wish to receive marketing or promotional communications from us, you can opt-out at any time by:

- using the unsubscribe feature found in our emails and other electronic communications, or
- contacting us via email at info@insighealth.com or marketing@well.company.

We remove your contact information from our distribution list as soon as you unsubscribe.

10. Consent

We will obtain the HCP's or patient's consent (or the guardian's consent for a Registered Child) to collect, use or disclose personal information (except where we are authorized to do so without consent). Consent can be provided orally, in writing, electronically, through an authorized representative, or it can be implied when the purpose for collecting, using or disclosing the personal information would be considered obvious, and the patient or HCP voluntarily provides personal information for that purpose. Consent may also be implied when a patient or HCP is given notice and a reasonable opportunity to opt-out but chooses not to.

11. Your rights

You also have the right to:

- make a written request to access your personal information,
- request us to restrict our use or disclosure of your personal information,
- object to our use or disclosure of your personal information,
- request that we edit, but not remove, certain information (like an e-mail address),
- request that we transfer to another organization the personal information you have provided us,
- request us to delete the personal information we hold about you, and
- request we delete your account.

Contact us at privacy@well.company to exercise any of these rights. In order to confirm your identity, we may require you to answer some security questions or provide proof of identity. We will respond within 30 days. If we cannot grant your request, for example if you make an access request and providing you access would disclose personal information about another person, we will give reasons. Please note, any requests with respect to your personal health information will be redirected to the relevant HCP.

We will address all requests with equal attention.

12. Contacting us

Accountability with respect to your personal information is important to Insig and WELL. In the event that you have any questions (including how personal information is managed by Insig or WELL), complaints or concerns about this Privacy Policy, or if you have reason to believe that we may have failed to adhere to it, please contact us by sending an email. Questions regarding your rights and responsibilities under this Privacy Policy can be directed to our privacy officer at privacy@well.company.

If after contacting us you are still not satisfied, you have the right to file a complaint with your local privacy authority.