Privacy Policy

Your privacy is important to us. It is IsaiX Technologies Inc.'s policy to respect your privacy and comply with any applicable law and regulations in Canada, United States, and Australia, regarding any personal information we may collect about you, including across our Coach Technology[©] web-based applications including Coach 4, Coach 5, Coach RT, IsaiX Cyber Scanner, IsaiX Breach ID, and other IsaiX applications we own and operate.

This policy is effective as of 1 October 2021.

Last updated: 1 October 2023

What is Personal Information?

Personal information is any information about you which can be used to identify you. This includes information about you as a person (such as name, address, and date of birth), your devices, payment details, and even information about how you use a application or online service.

Third Party Applications

In the event our application contains links to third-party applications and services, please be aware that those applications and services have their own privacy policies. After following a link to any third-party content, you should read their posted privacy policy information about how they collect and use personal information. This Privacy Policy does not apply to any of your activities after you leave our application.

Information We Collect

Information we collect falls into one of two categories: 'voluntarily provided' information and 'automatically collected' information.

'Voluntarily provided' information refers to any information you knowingly and actively provide us when using or participating in any of our services and promotions.

'Automatically collected' information refers to any information automatically sent by your devices in the course of accessing our products and services.

Log Data

When you visit our application, our servers may automatically log the standard data provided by your web browser. It may include your device's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, and other details about your visit.

Additionally, if you encounter certain errors while using the application, we may automatically collect data about the error and the circumstances surrounding its occurrence. This data may include technical details about your device, what you were trying to do when the error happened, and other technical information relating to the problem. You may or may not receive notice of such errors, even in the moment they occur, that they have occurred, or what the nature of the error is.

Please be aware that while this information may not be personally identifying by itself, it may be possible to combine it with other data to personally identify individual persons.

Device Data

When you visit our application or interact with our services, we may automatically collect data about your device, such as:

- Device Type
- Web Browser Version
- Unique device identifiers
- Device settings

Data we collect can depend on the individual settings of your device and software. We recommend checking the policies of your device manufacturer or software provider to learn what information they make available to us.

Personal Information

We may ask for personal information — for example, when you submit content to us or when you contact us — which may include one or more of the following:

- First Name
- Last Name
- Company Email
- Company Employee ID
- Company Role

User-Generated Content

We consider 'user-generated content' to be materials (text, image and/or video content) voluntarily supplied to us by our users for the purpose of publication to our application. All user-generated content is associated with the account or email address used to submit the materials.

Please be aware that any content you submit will remain private to your organization (and subsequent review or vetting process).

Legitimate Reasons for Processing Your Personal Information

We only collect and use your personal information when we have a legitimate reason for doing so. In which instance we only collect personal information that is reasonably necessary to provide our services to you.

Collection and Use of Information

We may collect personal information from you when you do any of the following on our applications:

- Register for an account
- Use a mobile device or web browser to access our application
- Contact us via email

We may collect, hold, and use information for the following purposes, and personal information will not be further processed in a manner that is incompatible with these purposes:

- to provide you with our platform's core features and services
- to contact and communicate with you in case of technical support
- for analytics, market research, and business development, including to operate and improve our application
- to enable you to access and use our application
- for internal record keeping and administrative purposes
- for technical assessment, including to operate and improve our application

We may combine voluntarily provided and automatically collected personal information with general information or research data we receive from other trusted sources. For example, Our marketing and market research activities may uncover data and insights, which we may combine with information about how visitors use our application to improve our application and your experience on it.

Security of Your Personal Information

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification.

Although we will do our best to protect the personal information you provide to us, we advise that no method of electronic transmission or storage is 100% secure and no one can guarantee absolute data security.

You are responsible for selecting any password and its overall security strength, ensuring the security of your own information within the bounds of our services. For example, ensuring any passwords associated with accessing your personal information and accounts are secure and confidential.

How Long We Keep Your Personal Information

We keep your personal information by default for 7 years. This time period may depend on what we are using your information for, in accordance with this privacy policy. For example, if you have provided us with personal information as part of creating an account with us, we may retain this information for the duration your account exists on our system. If your personal information is no longer required for this purpose, we will delete it or make it anonymous by removing all details that identify you.

However, if necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

Children's Privacy

We do not aim any of our products or services at children under the age of 13 and we do not knowingly collect personal information about children under 13.

Disclosure of Personal Information to Third Parties

We may disclose personal information to:

- a parent, subsidiary or affiliate of our company
- third-party service providers for the purpose of enabling them to provide their services including (without limitation) IT service providers, data storage, hosting and server providers, error loggers, maintenance or problem-solving providers, professional advisors, and payment systems operators
- our employees, contractors, and/or related entities
- courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights
- third parties to collect and process data
- an entity that buys, or to which we transfer all or substantially all of our assets and business

International Transfers of Personal Information

The personal information we collect is stored and/or processed in Canada or where we or our partners, affiliates, and thirdparty providers maintain facilities.

The countries to which we store, process, or transfer your personal information may not have the same data protection laws as the country in which you initially provided the information. If we transfer your personal information to third parties in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this privacy policy.

Your Rights and Controlling Your Personal Information

Your choice: By providing personal information to us, you understand we will collect, hold, use, and disclose your personal information in accordance with this privacy policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of our application or the products and/or services offered on or through it.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Access: You may request details of the personal information that we hold about you.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details provided in this privacy policy. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.

Non-discrimination: We will not discriminate against you for exercising any of your rights over your personal information. Unless your personal information is required to provide you with a particular service or offer (for example providing user support), we will not deny you goods or services and/or charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, or provide you with a different level or quality of goods or services.

Notification of data breaches: We will comply with laws applicable to us in respect of any data breach.

Complaints: If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

Deactivation: We may need to request specific information from you or your organization to help us confirm your identity.

Use of Cookies

We use 'cookies' to collect information about you and your activity across our application. A cookie is a small piece of data that our application stores on your computer, and accesses each time you visit, so we can understand how you use our application. This helps us serve you content based on preferences you have specified.

Please refer to our Cookie Policy for more information.

Business Transfers

If we or our assets are acquired, or in the unlikely event that we go out of business or enter bankruptcy, we would include data, including your personal information, among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may, to the extent permitted by applicable law, continue to use your personal information according to this policy, which they will be required to assume as it is the basis for any ownership or use rights we have over such information.

Limits of Our Policy

Our application may link to external applications that are not operated by us. Please be aware that we have no control over the content and policies of those applications, and cannot accept responsibility or liability for their respective privacy practices.

Changes to This Policy

At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes at the same link by which you are accessing this privacy policy.

If the changes are significant, or if required by applicable law, we will contact you (based on your selected preferences for communications from us) and all our registered users with the new details and links to the updated or changed policy.

If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.

Additional Disclosures for Australian Privacy Act Compliance (AU)

International Transfers of Personal Information

Where the disclosure of your personal information is solely subject to Australian privacy laws, you acknowledge that some third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act. You acknowledge that if any such third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

Additional Disclosures for California Compliance (US)

Under California Civil Code Section 1798.83, if you live in California and your business relationship with us is mainly for personal, family, or household purposes, you may ask us about the information we release to other organizations for their marketing purposes.

IsaiX Technologies Inc. offers services for professional development and does not fall under this category. We do not release information to other companies for marketing purposes.

Do Not Track

Some browsers have a "Do Not Track" feature that lets you tell applications that you do not want to have your online activities tracked. At this time we do not respond to browser "Do Not Track" signals.

We adhere to the standards outlined in this privacy policy ensuring we collect and process personal information lawfully, fairly, transparently and with legitimate, legal reasons for doing so.

Cookies and Pixels

At all times you may decline cookies from our application if your browser permits. Most browsers allow you to activate settings on your browser to refuse the setting of all or some cookies. Accordingly, your ability to limit cookies is based only on your browser's capabilities. Please refer to the IsaiX Cookie Policy for more information.

California Notice of Collection

In the past 12 months, we have collected the following categories of personal information enumerated in the California Consumer Privacy Act:

Identifiers, such as name, email address, name, IP address, and an ID or number assigned to your account.

For more information on information we collect, including the sources we receive information from, review the "Information We Collect" section. We collect and use these categories of personal information for the business purposes described in the "Collection and Use of Information" section, including to provide and manage our Service.

Right to Know and Delete

If you are a California resident, you have rights to delete your personal information we collected and know certain information about our data practices in the preceding 12 months. In particular, you have the right to request the following from us:

The categories of personal information we have collected about you;

The categories of sources from which the personal information was collected;

The categories of personal information about you we disclosed for a business purpose or sold;

The categories of third parties to whom the personal information was disclosed for a business purpose or sold;

The business or commercial purpose for collecting or selling the personal information; and

The specific pieces of personal information we have collected about you.

To exercise any of these rights, please contact us using the details provided in this privacy policy.

Any work committed by IsaiX Technologies to supply or delete employee personal information may come at additional cost to the account holder of the application.

Shine the Light

If you are a California resident, in addition to the rights discussed above, you have the right to request information from us regarding the manner in which we share certain personal information as defined by California's "Shine the Light" with third parties and affiliates for their own direct marketing purposes.

To receive this information, send us a request using the contact details provided in this privacy policy. Requests must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code.

Contact Us

For any questions or concerns regarding your privacy, you may contact us using the following details:

Should you have any questions or concerns regarding IsaiX Technologies Inc's privacy policy or you wish to consult or change your private information held by IsaiX or exercise your privacy rights therein please contact our Data Protecion Officer at the following email <u>privacy@isaix.com</u> or contact us through mail at the following address:

To the attention of:

IsaiX Technologies Inc. Data Protection Officer Erik Vincelli-Gregory 417-4030 Rue St-Ambroise Montréal, QC H4C2C7 1-888-243-9222