

PRIVACY POLICY

Effective Date: 23/09/2020

We take the utmost care in protecting the privacy of your account and all of the personal data that you store within it.

**UNDER NO CIRCUMSTANCES
DO WE SHARE OR SELL
ANY OF YOUR PERSONAL DATA.
PERIOD.**

WHO DO YOU CONTACT IF YOU HAVE ANY PRIVACY QUESTIONS?

If you have any questions, we invite you to email our Privacy Coordinator at: contact@myhealthcheckup.ca

Clinemetrica Inc.
430 Rue Saint-Pierre, Suite 200
Montreal, QC, H2Y 2M5
CANADA
Attn: Privacy Coordinator

In this Privacy Policy, the terms “we”, “us”, “our” refer to Clinemetrica Inc., a company incorporated in Canada.

This Privacy Policy governs the Canadian websites operated by us, including nvigorus.com, myhealthcheckup.ca, and monbilansante.ca (collectively, our "Website"), as well as any of our products, offerings, features, tools, or resources that we provide on our Website (collectively, our "Online Products"). By using our Website or any of our Online Products you agree to the terms of this Privacy Policy.

This Privacy Policy explains how we collect your personal information on our Website or through our Online Products, how we protect such information, and the choices you have concerning the use and disclosure of such information. Except as we disclose in this Privacy Policy, we will not sell, share, license, trade, or rent your personal information collected on our Website or through our Online Products to others.

Please read this Privacy Policy carefully. Your privacy and the security of your personal information are very important to us. We want you to be as comfortable as possible visiting our Website and using our Online Products. We are dedicated to protecting the privacy of those who visit our Website and use our Online Products. This Website is for use by residents of Canada only.

We may amend this Privacy Policy from time to time. We will post any changes to this Privacy Policy here so that you will always know what information we gather, how we might use that information, and whether we will disclose that information to anyone. Please refer back to this Privacy Policy on a regular basis.

Please remember that this Privacy Policy applies only to information collected by our Website or through the use of our Online Products. We are not responsible for the privacy of any information you reveal or post in any public forum feature (e.g., message board, blog, personal page, etc.), or for the privacy practices of websites that are operated or owned by third parties.

WHAT INFORMATION IS COLLECTED ON OUR WEBSITE OR THROUGH OUR ONLINE PRODUCTS?

We collect two types of information: personally identifiable information and non-personally identifiable information.

Personally Identifiable Information.

Personally identifiable information is information that identifies you or can be used to identify or contact you. This may include your name, address, email address, telephone number, birth date (for the purposes of determining eligibility to subscribe to our Online Products or offerings, conducting demographic analyses, and/or personalizing your experience on the Website ("Personally Identifiable Information")). We may request Personally Identifiable Information from you when you register on our Website,

subscribe to our Online Products or in connection with other Online Products we may make available on our Website from time to time. The only personal information required to register on the website is name and email address. In all other cases, we will collect Personally Identifiable Information from you only if you voluntarily submit such information to us. Unless you give us permission to do so, we will not sell, share, license, trade, or rent your Personally Identifiable Information other than as specified in this Privacy Policy.

Non-Personally Identifiable Information.

When you become a registered user of our Website, subscribe to one of our current Online Products, or in connection with other Online Products we may make available on our Website from time to time, we may also collect information that by itself cannot be used to identify or contact you, such as demographic information (like age or gender) and physical information (like current weight) ("Non-Personally Identifiable Information"). Non-Personally Identifiable Information may also include user IP addresses, browser types, domain names, and other anonymous statistical data involving the use of our Website. Non-Personally Identifiable Information is used to help us understand the characteristics of people who use our Website and to improve and market our Website in general and our Online Products in particular. In the event that we link any Non-Personally Identifiable Information with Personally Identifiable Information, we will treat such information as Personally Identifiable Information and only use such information in accordance with this Privacy Policy.

Information from Other Sources.

We may also supplement the information we collect with information from other sources to assist us in evaluating and improving our Website and Online Products, to determine your preferences so that we can tailor our Website and Online Products to your needs, and/or to study cardiovascular, nutritional, weight-loss, behavioural, and fitness questions in general.

WHERE AND WHEN IS INFORMATION COLLECTED ON OUR WEBSITE OR THROUGH OUR ONLINE PRODUCTS (INCLUDING THROUGH THE USE OF COOKIES AND ACTION TAGS)?

We may collect information (including information that is Personally Identifiable Information) from you in different manners and at different places and times on our Website, such as when you register for our Website or subscribe to one of our Online Products. We may also collect information from you in connection with, or through, other Online Products we may make available on our Website from time to time. The following is a description of the areas and/or manner in which we primarily collect information about you.

Becoming a Registered User and Subscription.

In order to access certain Online Products on our Website, such as our Community Areas, Health Assessments and Health Challenges, you must first complete certain steps to

become either a registered user or a subscriber. During these steps, you may be required to provide us with information (including Personally Identifiable Information) such as name, postal code and email address. This information is used to help us understand the characteristics of people who use our Website and to improve our Website and our Online Products. It is optional for you to provide demographic information, such as cultural origin, but providing this information is encouraged so that we can offer you a more personalised experience on our Website; for example, by making available information that we think may be of interest to you.

Cookies and Action Tags.

We also collect Non-Personally Identifiable Information passively using "cookies" and "action tags."

"Cookies" are small text files that are placed on your computer in order to identify: i) your Web browser; ii) the activities of your computer on our Website; and iii) your activity in connection with our advertisements and other marketing and promotional efforts. Cookies may be used to:

- personalise your experience on our Website (e.g., to dynamically generate content on web pages specifically designed for you);
- assist you in using our Online Products (e.g., to save you time by not having to reenter your name upon each visit to our Website); and
- allow us to statistically monitor how you are using our Website for purposes of improving our online offerings.

We may also use cookies to determine the popularity of certain content. We may link the information stored in cookies to Personally Identifiable Information you provide us, and to personalise your Website experience we may store Personally Identifiable Information you provide us in an encrypted form in temporary or "session" cookies, which are erased when you close your browser.

You do not have to accept cookies to use our Website; however, you may not be able to use certain products, offerings, features, or resources of our Website (including our Online Products) if you do not accept cookies. Although most browsers are initially set to accept cookies, you may reset your browser to notify you when you receive a cookie or to reject cookies generally. Most browsers offer instructions on how to do so in the "Help" section of the toolbar.

"Action tags," also known as web beacons or gif tags, are a web technology used to help track anonymous website usage information, such as how many times a specific page has been viewed. Action tags are invisible to you, and any portion of our Website, or e-mail sent on our behalf, may contain action tags. Unlike cookies, action tags are not placed on your computer. By using cookies and action tags together, we are able to gain valuable information to improve our Website and our Online Products.

We use Omniture, Inc. to help us track and analyze usage of our Website through cookies and action tags. All data collected by Omniture on our behalf is owned by us and serves

to better understand our users and improve our Website. More information can be found in Omniture's Privacy Policy.

Finally, please note that other third parties may also use their own cookies or action tags when you click on a link to their website or service, on or from our Website. This Privacy Policy does not govern the use by such third-party websites.

Online Products.

When you choose to use some of our Online Products, we collect information, some of which may be Personally Identifiable Information that you voluntarily provide to us through responses to special Online Products such as surveys, questionnaires, self-assessments, quizzes, challenges, and the like. Some of these Online Products may ask you for physical information, such as your weight and height. We collect this information in order to personalise your online experience.

Community Areas.

A "Community Area" means any blog, personal page, group page, chat room, message board, bulletin board, recipe swap, or similar activity. In addition, we may not be able to provide you with some of the other Online Products dependent upon the collection of such information, such as a personalised myhealthcheckup.ca home page.

We feature Community Areas where you and other users of our Website can communicate with one another. **THIS PRIVACY POLICY DOES NOT PROTECT YOU WHEN YOU USE OUR COMMUNITY AREAS OR PROVIDE INFORMATION (INCLUDING PERSONALLY IDENTIFIABLE INFORMATION) ABOUT YOURSELF IN THE COMMUNITY AREA.**

You should be aware that any information shared in a public forum such as a message board, blog, personal page, posting, or group bulletin board is public information and may be seen or collected by third parties that do not adhere to our Privacy Policy, although the availability of personal pages or groups identified as "private" may be limited to certain permitted users. However, even information marked "private" may be viewed by our staff. Third party search engines will not collect information you designate as "private", however once you participate in a Community Area by posting content, the content that you post (including your username) may appear in third party search engines. You should think carefully before disclosing any information in any public forum, or through the Community Profile feature, on our Website. For example, you should not select a username that includes personal information.

Log Files.

We also collect Non-Personally Identifiable Information through our Internet log files, which record data such as user IP addresses, browser types, domain names, and other anonymous statistical data involving the use of our Website. This information may be used to analyze trends, to administer the Website, to monitor our Website's use, and to gather general demographic information. We may link this information to

Personally Identifiable Information for these and other purposes such as personalizing your experience on our Website and evaluating our Online Products in general. In the event that we link such Non-Personally Identifiable Information with Personally Identifiable Information, we will only use such information in accordance with this Privacy Policy.

Email or Refer a Friend.

Through our referral tools for informing a friend about our Website, or one of our Online Products, we will automatically send your friend a one-time email containing the information you request to be sent. If you elect to use these referral tools, we will collect certain types of Personally Identifiable Information about your friend that you have provided, such as your friend's name and email address. **We do not store your friend's information or use it for any other purpose.**

DO WE COLLECT INFORMATION FROM CHILDREN UNDER 13 YEARS OF AGE?

We are committed to protecting the privacy of children. Our Website and Online Products are not designed for or directed to children under the age of 13. We do not collect Personally Identifiable Information from any person we actually know is under the age of 13. We urge all parents or guardians to participate in their children's exploration of the Internet, and to teach their children about protecting their personal information while online.

WHAT DO WE DO WITH THE INFORMATION WE COLLECT?

In general, we use the information collected on our Website and through our Online Products to help us understand who uses our Website and Online Products and how they are used, to personalise your experience (such as by providing you with information we think may be of interest to you), to assist you in using our Online Products, or to improve our Website and Online Products.

When you become a registered user of our Website or subscribe to one of our Online Products, we may use your information to send you a welcome email to confirm your username. If you opt-in, we may send you electronic newsletters, contact you about our products and services, send you information and news that may be of interest to you, and provide you with targeted feedback. If you no longer desire to receive these communications, we will provide you with an option to change your preferences. In addition, if you identify yourself to us by sending us an email with questions or comments, we may use your information (including Personally Identifiable Information) to respond to your questions or comments, and we may file your questions or comments for future reference. We may also use the information collected to contact you about important service announcements and updates regarding our Website or Online Products. You will not be able to opt-out from these service announcements and updates as they

contain important information relevant to your use of our Website and/or our Online Products and are not promotional in nature.

We may also use the information gathered on our Website and through our Online Products to perform statistical analysis of user behaviour, to analyze and evaluate issues relating to cardiovascular health, nutrition, weight loss, behaviour and fitness, or to evaluate and improve our Online Products. We may link some of this information to Personally Identifiable Information for internal purposes only or to assist you in your personal lifestyle changes such as losing weight, stopping smoking, or other positive changes that may influence your health status.

WHEN DO WE DISCLOSE INFORMATION TO THIRD PARTIES?

Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Website.

Affiliates.

For purposes of this Privacy Policy, "Affiliate" means any person or entity which directly or indirectly controls, is controlled by, or is under common control with Clinemetrica Inc., whether by ownership or otherwise.

We may disclose information (including Personally Identifiable Information) about you to our Affiliates. Any information relating to you that we provide to our Affiliates will be treated by those Affiliates in accordance with the terms of this Privacy Policy.

Laws and Legal Rights.

We may also disclose your information (including Personally Identifiable Information) if we believe in good faith that we are required to do so in order to comply with an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, or other valid legal process. We may disclose Personally Identifiable Information in special circumstances when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our Terms & Conditions, or to protect the safety and/or security of our users, our Website or the general public.

Third Parties Generally.

From time to time, we may provide to third parties aggregate data that includes data that you have provided us but does not allow you to be identified or contacted, including where such information is combined with similar information of other users of our Website. For example, we might inform third parties regarding the number of unique users who visit our Website, the demographic breakdown of the registered users of our Website, or the activities that visitors to our Website engage in while on our Website. The third parties to whom we provide this information may include commercial partners, sponsors, licensees, researchers, and other similar parties.

Outside Contractors.

We may employ independent contractors, vendors, and suppliers (collectively, "Outside Contractors") to provide specific services and products related to our Website or Online Products, or to develop applications for our Website and e-mail services. These Outside Contractors may sometimes have limited access to information collected on our Website, including your Personally Identifiable Information, in the course of providing products or services to us. Access to your Personally Identifiable Information by these contractors is limited to the information reasonably necessary in order for the Outside Contractors to perform their limited function for us. We also require that these Outside Contractors (i) protect the privacy of your Personally Identifiable Information consistent with this Privacy Policy, and (ii) not use or disclose your Personally Identifiable Information for any purpose other than providing us with products or services for which we contracted.

Sale of Business.

We reserve the right to or transfer information to a third party in the event of a sale, merger, or other transfer of all or substantially all of the assets of Clinemetrica Inc. provided that the third party agrees to adhere to the terms of this Privacy Policy. We will notify users of any such transfer through notice on our site and through email.

DOES THIS PRIVACY POLICY APPLY WHEN YOU LINK TO OTHER WEBSITES?

Our Website contains links to other websites not owned or operated by Clinemetrica Inc. or an Affiliate (for example, if you click on a banner advertisement, you will likely be taken off our Website). We will attempt to make it obvious to you when you leave our Website and enter these websites by opening a new browser or otherwise notifying you that you are leaving our Website. However, please be aware that we are not responsible for the privacy practices of such websites. We encourage you to be aware when our Website links to other websites and to read the privacy policies or statements of each and every website. This Privacy Policy applies solely to information collected by our Website or through our Online Products.

IS THE INFORMATION WE COLLECT SECURE?

We want your information (including Personally Identifiable Information) to remain as secure as possible. We strive to provide secure transmission of your information from your computer to our servers through industry-standard techniques. To help ensure the integrity and privacy of the Personally Identifiable Information you provide to us via the Internet at the time you elect to become a registered user or subscribe to our Online Products, we use Secured Socket Layer (SSL) encryption technology in transmitting such Personally Identifiable Information over the Internet to our servers. We secure the Personally Identifiable Information you provide on servers located in controlled, secure environments, protected from unauthorised access, use, or alteration.

Only employees or agents who need access to your information to perform a specific task or function are granted access to such information. In addition, all Clinemetrica employees and agents must abide by this Privacy Policy and are kept up-to-date on security practices. Any employee who violates this Privacy Policy is subject to disciplinary action, up to and including termination.

Notwithstanding the above commitments to protect your information (including Personally Identifiable Information) from loss, misuse or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that others could find a way to thwart our security systems. As a result, while we strive to protect your information, we cannot ensure or warrant the security and privacy of any information you transmit to us, and you do so at your own risk.

WHAT CHOICES DO YOU HAVE REGARDING THE COLLECTION, DISCLOSURE, AND DISTRIBUTION OF PERSONALLY IDENTIFIABLE INFORMATION?

Except as otherwise described in this Privacy Policy, we will only use Personally Identifiable Information for the purposes described above or as otherwise disclosed at the time we request such information from you. You must opt-in and give us permission to use your Personally Identifiable Information for any other purpose. If you no longer wish to receive communications from us, you may notify us by contacting our Privacy Coordinator by email, fax, or postal mail at the address set out below. You may change your preferences and opt-out of receiving other communications by changing that option in the “My Account” feature of our Website, following the directions provided in association with the communication, or by contacting our Privacy Coordinator at the address set out below.

Users of our Website are notified when Personally Identifiable Information is being collected by third parties on our Website. We do this so you can make an informed choice as to whether you should disclose information to a third party.

CAN YOU UPDATE OR CORRECT PERSONALLY IDENTIFIABLE INFORMATION?

You can always contact us in order to: i) update or correct your Personally Identifiable Information; ii) change your preferences with respect to communications and other information you receive from us; or iii) delete the Personally Identifiable Information maintained about you on our systems. Such updates, corrections, changes, and deletions will not have an effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change, or deletion.

You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our systems. The need to back-up our systems to protect information from inadvertent loss means that a copy of your Personally Identifiable Information may exist in a non-erasable form that will be difficult or impossible for us to locate. We promise that promptly after receiving your request, all Personally Identifiable Information stored in databases we actively use and other readily searchable media will be updated, corrected, changed, or deleted, as appropriate, as soon as reasonably practicable.

HOW DO WE RETAIN AND STORE YOUR PERSONAL INFORMATION

We retain your personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and your consent to such purposes(s) remains valid after termination of our relationship with you.

Your Personally Identifiable Information may be processed and stored outside of the province in which you reside (but not outside of Canada) by us, an affiliate, or an unaffiliated service provider for the purposes set out in this Privacy Policy and under the laws of these other jurisdictions. In certain circumstances, law enforcement agencies or regulatory agencies may be entitled to access your personal information.

Upon termination or cancellation of your subscription, we will continue to store certain Personally Identifiable Information in particular to enable us to draw on these data and to provide you with ongoing access in the event you should re-subscribe to our Website. In the event you have any objection to this, you should submit your objection to us via email to contact@myhealthcheckup.ca. In such case, we will delete or make anonymous your Personally Identifiable Information.

HOW WILL YOU KNOW IF THERE ARE ANY CHANGES TO THIS PRIVACY POLICY?

If we decide to change this Privacy Policy, we will post those changes on our Website so you are always aware of what information we collect, how we use it, and under which circumstances, if any, we disclose it. If at any point we decide to use Personally Identifiable Information in a manner significantly different from that stated in this Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email or otherwise. In such a case, you will have a choice as to whether or not we use your Personally Identifiable Information in this new manner. We may also make non-significant changes to our Privacy Policy that generally will not affect our use of your Personally Identifiable Information. If you do not agree to the terms of this Privacy Policy, you should not use our Website.

WHO DO YOU CONTACT IF YOU HAVE ANY PRIVACY QUESTIONS?

If you have any questions about our Privacy Policy or feel that we are not abiding by the terms of our posted Privacy Policy, please contact our Privacy Coordinator in any of the following ways:

Email our Privacy Coordinator at:

contact@myhealthcheckup.ca

Or, write to our Privacy Coordinator at:

Clinemetrica Inc.
430 Rue Saint-Pierre, Suite 200
Montreal, QC, H2Y 2M5
CANADA
Attn: Privacy Coordinator

Or, fax our Privacy Coordinator at:

(514) 846-1447

Attn: Privacy Coordinator

BY USING OUR WEBSITE, YOU SIGNIFY YOUR ACCEPTANCE OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU SHOULD NOT USE OUR WEBSITE. YOUR CONTINUED USE OF OUR WEBSITE FOLLOWING THE POSTING OF CHANGES TO THIS PRIVACY POLICY WILL MEAN THAT YOU ACCEPT THOSE CHANGES.