

Privacy Notice

Please read this notice carefully to understand our policies and practices regarding your personal information and how we will treat it. Contact details are provided at the end of the notice for any feedback or privacy enquiries you may have.

Under the Act, respecting the protection of personal information in the private sector (CQLR c P-39.1), Recherches Neuro-Hippocampe (RNH) and its wholly owned subsidiaries (The Memory Clinic/Clinique Memoire) shall protect all the personal information you provide to us and protect your privacy.

This notice concerns you because it describes how we collect, use, communicate and protect your personal information on our sites and digital platforms as part of our activities. This notice also contains information on how you can exercise your rights; for example, accessing your information or having it corrected.

By providing your personal information to us (whether via one of our websites, by email, in person or over the phone), you agree to the processing set out in this Privacy notice. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided to you when we collect personal data from you.

This Privacy notice aims to help you understand our personal data collection, usage, and disclosure practices by explaining:

Who are we and what do we do?

Our interdisciplinary team includes numerous health professionals whose common goal is to help our seniors live longer and live better. We offer this population a professional assessment of their physical and cognitive health, and offer access to participation in clinical trials related to Alzheimer's disease for people who meet the various criteria for studies. This service is free of charge and the information obtained remains fully confidential.

What personal information do we collect about you?

We may collect and process different types of personal information while operating our business and providing our services. Personal information is information that can be used to uniquely identify a single person, either directly or indirectly. These include:

- Information on your identity: Name, Title, Telephone number, Country, Province, Email address, Data on a piece of identification
- Usage information: Information on the person's visit or use, including the IP address of the device or computer and the browser used to access our sites and digital platforms; Operating system; Location, with your permission; browsers; language settings; previously visited websites; Keywords searched in a search engine; Number of pages viewed; Information entered, duration of time spent on the website, and ads viewed by this person
- Any information submitted manually by you in forms offered on the site to contact us.

How do we use your personal data?

Any personal data obtained using our website will only be used confidentially within our organization, and broadly in anonymized forms to provide insight on general usage of our website.

Before you choose to participate in assessments, clinical trials or treatment, further information on your privacy rights and usage will be provided.

Who do we disclose your personal information to?

We do not disclose information which could identify you personally, to anyone except as described in this notice, as permitted, or required by law, and/or for the purposes described in this notice, including:

Third-Party Category	What they do for us
<p align="center">Business Partners</p>	<p>We may communicate your personal information to certain business partners who, under a law or regulation, need this personal information, for example, if you experience a severe adverse event during a clinical trial which makes it necessary to share clinical data for your health. necessary.</p>
<p align="center">Government Agencies</p>	<p>We may communicate personal information with government departments, government agencies and other entities in accordance with local and federal regulations and laws.</p>

Transfers out of Quebec

Data protection law in Quebec prohibits the transfer of personal information to locations outside of Quebec unless the organization transferring the information has implemented contractual safeguards and assessed the laws in the receiving country. Your personal information will be transferred out of Quebec to service providers and other entities listed in this notice.

Where your personal information is transferred to entities within RNH, for example for internal risk analysis and compliance checks, we have implemented an Intra Group Agreement as the mechanism to permit the lawful and secure transfer of personal information between RNH's entities.

Where your personal information is processed by a service provider, we enter into written contracts that contain appropriate measures to protect the confidentiality of your information, to ensure that the information is used only for performing the contract and that the service provider does not retain the information unless there is a legal regulatory or professional obligation requiring that they do so. We perform due diligence on our service providers to confirm that they will implement appropriate administrative, technical, and physical safeguards to protect personal information in accordance with our instructions. In many cases, your information is anonymized when information is shared for clinical research purposes.

How long do we retain your personal information?

We retain your personal information for as long as necessary to fulfil the purposes indicated in this notice unless the law states that we can retain it for longer.

We currently retain personal information in Canada. However, we may communicate personal information to places other than your country, province, state of residence or outside Québec (if you are a Québec resident), where privacy protection laws may differ. Additionally, anonymized information may be used by clinical research partners outside Canada.

How do we obtain your consent?

We consider you to have validly consented to the collection, use or disclosure of your personal information if (i) you give your express written or oral consent; (ii) you voluntarily provide personal

information for an obvious purpose; or (iii) if you do not object to the collection, use or disclosure of personal information by RNH within a reasonable time after RNH has given you clear notice, including through this Policy, of its intention to do so and the intended purposes. We may collect or receive your personal data in different ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website, or a 3rd party website. Where we monitor use of, or interactions with, our websites, any marketing we may send to you, or other email communications sent from or received by RNH;
- Publicly available sources - provincial health information databases

What are your rights concerning your personal information?

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes. Under the Acts, you have a range of rights concerning your personal information, including:

Right to Access and Correction of Personal Information: You may request access to the personal information we have concerning you and obtain a copy thereof. Please contact privacy@thememoryclinic.ca to request access to or correct any personal information you have provided to us.

We will respond within 20 days, unless we need to extend the time as authorized under the Acts.

We cannot 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.

In addition to the above rights, you have the right to control the dissemination of personal information (referred to as the 'right to be forgotten'), and a right to data portability. To exercise these rights, please complete our dedicated rights form or contact us via the details provided in the 'Contact Us' section.

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

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation.

If you are concerned about our response or would like to correct the information provided, you may contact us at privacy@thememoryclinic.ca

Automated Decisions

Quebec's amended Privacy Sector Act requires that, when we render a decision based exclusively on an automated processing of personal information we must, at the time of or before the decision, inform the individual concerned. Automated decisions mean that a decision concerning you is made based on a computer determination (using software algorithms), without any human review or involvement.

We have implemented measures to safeguard the rights and interests of individuals whose personal information is subject to automated decision-making. Upon request, Quebec's amended Private Sector Act states that we must inform individuals about whom such a decision has been made of the:

- Personal information used to render the decision
- Reasons and principal factors and parameters that led to the decision
- Right to submit observations in respect of the automated decision
- Right to have the personal information used to render the decision corrected
- To exercise this right, please complete our dedicated rights form contact us at privacy@thememoryclinic.ca

How to withdraw your Consent?

If you have given 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 privacy@thememoryclinic.ca.

Please note that if you withdraw your consent, we may not be able to provide you with certain services. We will explain the effect of withdrawing your consent to help you decide.

How do we protect your personal information?

RNH has implemented a range of governance policies and practices relating to the protection of personal information. These enable our organization to maintain an effective system of internal controls to facilitate compliance with the data protection laws in the province of Quebec. There are several aspects to our privacy framework, including:

- A dedicated Data Protection Officer will provide advice and guidance to the organization on a range of privacy matters. Ongoing training and awareness to promote compliance with our privacy requirements is in place, and all staff (including contractors and employees) must complete mandatory data protection training.
- Policies, procedures, and guidelines are in place that define both general principles relating to the collection, use and disclosure of personal information, and mandatory requirements with key business actions that must be incorporated into information handling practices.
- Privacy by Design has been implemented into our operating model, which requires the completion of Privacy Impact Assessments for projects and changes processes to ensure that privacy issues are identified and addressed in the project life cycle. Additional safeguards are in place to protect personal information that qualifies as sensitive.
- Personal information is protected using appropriate physical, technical and organizational security measures. Our Information Security Policy and its supporting standards, controls roles and responsibilities for protecting personal information and information systems are well defined.
- A reporting process is in place for staff to notify all suspected or confirmed security incidents to a dedicated operations team.
- An information retention policy and retention schedule define the minimum and maximum periods that different personal data can be retained for.

How do we protect your personal information?

We recognize that information security is an integral element of data privacy. While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical, and procedural measures to help protect personal

data from unauthorized access, use, disclosure, alteration, or destruction in accordance with data protection law requirements.

Information that you provide to us is stored on our or our service providers' secure servers and accessed and used subject to our security policies and standards, or those agreed with our service providers.

Everyone at RNH and any third-party service providers we may engage that process personal data on our behalf (for the purposes listed above) are also contractually obligated to respect the confidentiality of personal data.

Technology enabling the identification, location, or profiling of individuals

RNH, and/or its third-party service providers, collect information using technological means which enable the identification, location, and/or profiling of individuals. We are required to inform you of the means available to activate these functions. Our Cookies Notice details how, when using our websites, mobile sites, and mobile apps, we obtain your consent before we place cookies or similar technologies on your device. You can withdraw or change this consent unless those cookies are strictly necessary to operate the site or provide the services. We use a Cookie Banner to make sure we have your permission to collect data, and a Cookie Preference Centre to allow you to grant and change your permissions. Further details on the technological means for collecting personal information using technologies with identification, localization or profiling functions is outlined below:

Location

Geolocation data relates to any data taken from a user's device that indicates its precise geographical location by using for instance, longitude and latitude co-ordinates obtained through their GPS or device settings. Location data relates to data taken from a user's device that indicates, with reasonable specificity, its approximate location by using, for instance, longitude and latitude co-ordinates obtained through GPS or Wi-Fi or cell site triangulation. For mobile app users, geolocation data is collected from hardware sensors that allow us to detect a wide variety of signals from different sources such as satellites (GPS) to determine the geographical position of a device during our address check for onboarding and transactional purposes. The collection of location data can be stopped by disabling the location settings in your device, but this may impact your ability to use our services.

CONTACT DETAILS AND COMPLIANCE UNDERTAKING

If you have any comments, questions or requests regarding this Privacy Policy and our privacy practices, please contact us at privacy@thememoryclinic.ca

We have procedures in place to receive and respond to complaints or inquiries about how we handle personal information and our compliance with this Policy and applicable privacy laws.

If you are not satisfied with the way we have handled your personal information, you may submit a complaint to us. The complaint will be investigated by RNH's privacy officer, who will determine whether the personal information was handled in compliance with RNH's policies, protocols and practices and other applicable law. The privacy officer will make every reasonable effort to resolve complaints. Complainants will be informed of any progress or outcome of the investigation within no more than 30 days of receipt of the complaint and/or any additional time required to complete the investigation.

You may also contact the Commission d'accès à l'information du Québec. A written complaint can be filed with the Commission by visiting www.cai.gouv.qc.ca/diffusion-de-linformation/services-et-formulaires/. However, we encourage you to contact RNH's privacy officer first.