

DTLS Mobile App Privacy Policy

Last modified: 2022-03-30

1. Purpose of this Policy

Pangaea Solutions Inc. ("**Company**" or "**We**") respect your privacy and are committed to protecting it by complying with this policy.

This policy describes:

- The types of information we may collect or that app users ("**you**") may provide when you purchase, download, install, register with, access, or use the Digital Thread for Life Sciences application (the "**App**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We are committed to ensuring the security and privacy of the collected personal information. Accordingly, we are committed to observing applicable industry guidelines including those established by the European Union's General Data Protection Regulation ("**GDPR**"), the *Personal Information Protection Act* of the province of British Columbia, the *Personal Information Protection Act* of the province of Alberta, the *Personal Information and Electronic Documents Act* of Canada and other relevant privacy legislation. We continue to evaluate enhanced ways to protect your privacy while seeking to deliver our Services to you.

2. Application of this Policy

This policy applies only to information we collect in this App and in email, text, and other electronic communications sent through or in connection with this App.

This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App or through the SAP store.
- You provide to or is collected by any third party (see **Third-Party Information**).

Our websites and apps, and these third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you indicate that you understand, accept, and consent to the practices described in this privacy policy. This policy may change from time to time (see **Changes to Our Privacy Policy**).

Your use of this App constitutes not merely your consent, but also your electronic signature, meaning that you are contractually bound by these terms and by our Privacy Policy. Your continued use of this App after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates.

3. Information We Collect about You and How We Collect It

- (a) We collect information about you through:
 - (i) **Direct interactions with you when you provide it to us**, for example, by corresponding with us or requesting information from us about our products or services.
 - (ii) **Automated technologies or interactions**, for example, when you use our website or download the App, we may use “cookies” to track your downloads. Cookies are small text files that can be used by websites to make a user's experience more efficient and allow the analysis of use on our website.
 - (iii) **Account Information**, for example your organization may require you to enter certain account information (such as your DTLS account information) to download, install or launch the App.
- (b) The types of information that we collect include:
 - (i) **Personal information** that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, email address, telephone number, internet protocol (IP) address, user name or other similar identifier, as well as any other identifier we may use to contact you ("**personal information**").
 - (ii) **Non-personal information** that does not directly or indirectly reveal your identity or directly relate to an identified individual, such as demographic information, or statistical or aggregated information. We may derive non-personal statistical or aggregated data from the personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific app feature in the App.
 - (iii) **Technical information**, including your login information, device type, time zone setting, and usage details. We collect this information when the App contacts our servers, for example, when you update the App. The information we collect also includes things like your device type and carrier name and crash reports, depending on your device settings.

4. Information You Provide to Us

We may ask you to provide us with different types of personal information, depending on what you require. When you visit our website or contact us to inquire about our products and services, we will require and collect your email address and other contact information so that we can respond to your request. We may also process your personal information where required by your organization to allow you to use the App.

5. Collection of Information by Third Parties

When you use the App or its content, certain third parties collect information about you or your device. These third parties may include:

- (a) Your mobile device manufacturer.
- (b) Your mobile service provider.
- (c) SAP.

These third parties may use cookies alone or in conjunction with other tracking technologies to collect information about you when you use the App. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps and other online services. For more information on SAP's data collection methods visit <https://www.sap.com/corporate/en/legal/privacy.html>.

We do not control these third parties' tracking technologies or how they use them. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

6. Retaining Your Personal Information

When you visit our site and make a request we will retain your data for as long as it is required to respond to your requests, or if this data is necessary to comply with our internal compliance or legal obligations. We do not collect your personal information when you use the App.

7. Why We Process Your Personal information

We use information that we collect about you or that you provide to us to fulfill your request, provide you with the information you requested, provide our products and services, operate, evaluate, and improve our business (including developing new products and services; enhancing and improving our products, services, websites and mobile apps; managing our communications; analyzing our products and services; and performing accounting, auditing and other internal functions); perform data analyses (including anonymization and aggregation of personal information), protect against, identify, and prevent fraud and other unlawful activity, claims and other liabilities and enforce relevant industry standards, and our policies, or meet our legal obligations, such as to comply with and enforce applicable legal requirements.

For the purposes above, we process your personal information for the fulfillment of contractual obligations (Article 6 (1b) GDPR), on the basis of legal requirements (Article 6 (1c) GDPR) and for the purposes of legitimate interests of the Company (Article 6 (1f) GDPR).

We will delete your personal information as soon as it is no longer needed for the specific purpose. We are required to retain business and commercial documentation and other tax-relevant documents in order to fulfill our commercial and tax law archiving obligations. Retention periods are determined by the applicable laws.

8. Information We Share

We do not sell personal information we collect about you. We may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government entities, and (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

From time to time, we may also share anonymized and aggregated information about you (such as by publishing a report on trends in the usage of our Services). We may also use the aggregated data to train our machines to learn algorithms to improve how we deliver our services.

9. How We Share Your Information

Where we share your personal information with a data processor, we will put the appropriate legal framework in place in order to cover such transfer and processing (Articles 26, 28 and 29 GDPR). Furthermore, where we share your personal information with any entity outside the EEA, we will put appropriate legal frameworks in place, notably controller-to-controller (2004/915/EC) and controller-to-processor (2010/87/EU) Standard Contract Clauses approved by the European Commission, in order to cover such transfers (Articles 44 ff. GDPR).

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. If your country is a country inside the European Union, these countries may not have the same data protection laws as Canada or the country in which you initially provided the information.

For each of these transfers, we will make sure that we provide an adequate level of protection to the data transferred, in particular by entering into standard contract clauses as defined by the European Commission decisions 2001/497/EC, 2002/16/EC, 2004/915/EC and 2010/87/EU.

You are welcome to contact us to obtain further information about Company policies regarding service providers outside of Canada.

By submitting your personal information or engaging with the App, you consent to this transfer, storage, or processing of the personal information we collect.

10. Right to Access, Rectify or Delete your Personal Information

We offer you certain choices in connection with the personal information we collect from you. Where we have collected any of your personal information, you have the right to access, rectify or delete such information. To update your preferences or submit a request, please contact us through the contact address provided below.

11. Withdrawing Your Consent

Where you have provided 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 through the contact address specified below. Please note that if you withdraw your consent we may not be able to respond to your questions about our products and services or provide you with a particular product or service. Please contact your organization if withdrawing your consent prevents you from using a particular product or service that your organization has given you access to.

12. Your Rights under the GDPR

To the extent the EU General Data Protection Regulation applies to the processing of your personal information, you have the following rights and choices:

- (a) Right to information, Art. 15 of the GDPR;
- (b) Right to correction, Art. 16 of the GDPR;
- (c) Right to deletion (“Right to be forgotten”), Art. 17 of the GDPR;
- (d) Right to limit processing, Art. 18 of the GDPR;
- (e) Right to data transmissibility, Art. 20 of the GDPR;
- (f) Right to object, Art. 21 of the GDPR.

We act as processors on behalf of your organization and are obliged to assist your organization in the exercise of your rights. However, your organization controls your personal information and, as the controller of your personal information, is better equipped to assist you in addressing your privacy concerns or the exercise of the rights we have listed above.

13. Data Security

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We use appropriate technical or organisational measures to achieve this level of protection in compliance with Article 25(1) and 32 of the GDPR.

The safety and security of your information also depends on you. Where we have given you (or you have chosen) a password for access to certain parts of our App, you are responsible for keeping it confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through the App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any App privacy settings or security measures.

14. Data Retention

We handle records of all processing of personal information in accordance with the obligations established under Article 30 of the GDPR, both where we might act as a controller or as a processor. In these records, we reflect all the information necessary in order to comply with the GDPR and cooperate with the supervisory authorities as required.

15. Data Breaches

In case of breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal information transmitted, stored or otherwise processed, we have the mechanisms and policies in place in order to identify it and assess it promptly. Depending on the outcome of our assessment, we will make the requisite notifications to the supervisory authorities and communications to the affected data subjects, which might include you.

16. Children

We do not knowingly collect and process information on children under nineteen (19) without permission and consent of their parent(s). If we discover that we have collected and processed the personal information of a child under nineteen (19) directly, or the equivalent minimum age depending on the concerned jurisdiction, we will take steps to delete the information as soon as possible. If you become aware that a child under nineteen (19) has provided us with personal information directly, please contact us immediately by using the contact address specified under this Privacy Policy.

17. Changes to Our Privacy Policy

We may update our privacy policy from time to time. It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page.

We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting this privacy policy to check for any changes.

18. Contact Information and Challenging Compliance

We appreciate that despite our efforts there may be lapses in our privacy policy. We take all complaints seriously and we will do our best to resolve any issue. If you have any complaints about your personal information is used by us then please write to Anja at anja.rautenbach@ps-i.ca.

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our privacy officer using the contact information listed above.