

# **ICI MEDICAL COMMUNICATIONS INC.—PRIVACY POLICY**

This Privacy Policy applies to ICI MEDICAL COMMUNICATIONS INC. in respect of its processing of personal information in connection with its activities.

The purpose of this Privacy Policy is to inform healthcare providers, customers and other individuals we deal with ("you" or "your") how we collect, use, disclose and protect your personal information.

Personal information is information about an identifiable individual, as more particularly defined and limited by applicable privacy laws. This Privacy Policy applies to our collection, use and disclosure of personal information. This Privacy Policy does not apply to personal information about our employees nor to information that is not personal information.

## **Collecting Personal Information**

In carrying on its business, ICI MEDICAL COMMUNICATIONS INC (ICI) collects various types of personal information including personal information about healthcare providers (including physicians, pharmacists and other healthcare workers), patients, participants in clinical studies, and customers. Personal information that we collect may include:

- names, titles, addresses, telephone numbers, email addresses and other contact information;
- the necessary information to make adverse drug reaction reports to Health Canada, which information is generally recorded using an initial for a patient rather than the patient's name;
- names and contact information of healthcare providers involved in clinical trials and information relating to their professional qualifications and experience as required by regulation;
- information about patients participating in clinical trials and clinical trial data collected during clinical trials, which information is protected using an identifier for a patient other than the patient's name (e.g., initials, numbers);
- other information, with your consent or as permitted or required by law.

## **Using Personal Information**

ICI MEDICAL COMMUNICATIONS INC generally uses personal information for the following purposes:

- establishing, maintaining, and managing relationships with healthcare providers, customers and other individuals that we deal with in the course of our business;
- providing advice, assistance and recommendations to healthcare providers with respect to our products to meet healthcare provider needs;

- responding to feedback, questions, comments, requests, inquiries, complaints, or reports of adverse event reports about our products or services;
- generating adverse drug reaction reports or other reports required by regulatory bodies;
- administering contests, promotions, surveys, quizzes or polls;
- maintaining business records for reasonable periods and generally managing and administering our business including defending and bringing legal actions;
- meeting legal, regulatory, insurance, security and processing requirements; and
- otherwise with consent or as permitted or required by law.
- Disclosing Personal Information: ICI MEDICAL COMMUNICATIONS INC discloses personal information in the following circumstances:
  - to regulatory agencies as required by law or in order to meet the regulatory requirements of ICI MEDICAL COMMUNICATIONS INC legitimate business purposes; and
- otherwise with consent or as permitted or required by law.

## **Business Transactions**

Personal information may be used by ICI MEDICAL COMMUNICATIONS INC and disclosed to parties connected with a proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of ICI MEDICAL COMMUNICATIONS INC or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of ICI MEDICAL COMMUNICATIONS INC or our business or assets may use and disclose your personal information for similar purposes as those described in this Privacy Policy.

## **Service Providers**

ICI MEDICAL COMMUNICATIONS INC may transfer personal information to outside agents or service providers (including our affiliates acting in this capacity) for reasons such as data processing, data warehousing, administrative services, conducting programs, and otherwise collecting, using, disclosing, storing or processing personal information on ICI MEDICAL COMMUNICATIONS INCs behalf for the purposes described in this Privacy Policy. ICI MEDICAL COMMUNICATIONS INC uses reasonable contractual or other means to require third parties to commit to protecting personal information to a level comparable to that provided by ICI MEDICAL COMMUNICATIONS INC. Some of these service providers may be located outside of Canada and your personal information may be collected, used, disclosed, stored and processed in these jurisdictions for the purposes described in this Privacy Policy. While your personal information is located outside Canada it will be subject to the laws of the jurisdiction in which it is retained, including laws that may require disclosure of personal information to foreign government authorities.

## **Our website and the Internet**

## **IP Addresses and Server Logs**

The nature of the internet is such that it passively and automatically collects certain information about a user's traffic patterns linked to their Internet Protocol (IP) addresses. These are unique Internet "addresses" assigned to all web users by their Internet Service Providers (ISP). IP addresses are automatically logged by web servers. While the IP address does not generally identify an individual on its face, it may, with the cooperation of the ISP, be used to locate and identify an individual using the internet.

ICI MEDICAL COMMUNICATIONS INCs servers automatically log information about visits to our website in the normal course of establishing and maintaining web connections. Server logs record statistical information, such as visitors' IP addresses, type of operating systems, time and duration of visit, web pages requested, and identify categories of visitors by items such as domains and browser types. These statistics are reported in aggregate form to ICI MEDICAL COMMUNICATIONS INC and are used to improve our website and ensure that it provides the optimal web experience for visitors.

ICI MEDICAL COMMUNICATIONS INC does not link server log information to any other data in a way that would enable us to identify individual visitors. However, we may review server logs for security purposes, for example, to detect intrusions into our network.

## **Cookies**

As with many other websites, our site makes use of session and permanent "cookie" technology. Cookies are small text files that contain a unique identification number that is automatically deposited on a visitor's computer. This information helps us determine, in the aggregate, the total number of visitors to the site on an ongoing basis and the types of internet browsers and operating systems used by our visitors. This information is used to facilitate and enhance your online visits. We do not cross-reference the information automatically collected through "cookies" with any type of personal information that is voluntarily offered on or through this website.

The use of cookie technology is common on the Internet, and many internet browsers are initially configured to accept cookies automatically. If you would prefer not to accept cookies, you can set your internet browser to notify you when your computer is receiving a cookie or to refuse cookies automatically. However, if you refuse to accept cookies, this may limit your use of the website.

Other websites to which the ICI MEDICAL COMMUNICATIONS INC website provides links are governed by different privacy policies. ICI MEDICAL COMMUNICATIONS INC does not assume responsibility for the content or information practices of these other websites, and we strongly encourage all web visitors to review the privacy statements and policies of all externally-linked sites.

## Your Consent

Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide personal information necessary for a service you have requested). You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an “opt-out” option provided, if any. The form of the consent sought by ICI MEDICAL COMMUNICATIONS INC, including whether this consent is express or implied, may vary depending upon the circumstances and the type of personal information. In determining the form of consent to use, ICI MEDICAL COMMUNICATIONS INC will take into account the sensitivity of the personal information and the reasonable expectations of the individual. **Generally, by providing us with your personal information, we will assume that you consent to our collection, use and disclosure of such personal information for the purposes identified or described in this Privacy Policy, if applicable, or otherwise at the time of collection.**

If an individual is not capable of consenting to the collection, use or disclosure of his or her own personal information, consent must be obtained from the person who is legally entitled to consent on behalf of the individual.

You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain of our products or services. ICI MEDICAL COMMUNICATIONS INC will inform you of the implications of withdrawing consent. In certain circumstances, you may not be permitted to withdraw consent to certain necessary uses and disclosures of the personal information for which your consent was originally collected.

ICI MEDICAL COMMUNICATIONS INC collects, uses and discloses your personal information with your consent, except as permitted or required by law. We may be required or permitted under statute or regulation to collect, use or disclose personal information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

## Security

ICI MEDICAL COMMUNICATIONS INC implements reasonable security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the personal information is held.

The methods of protection include:

- physical measures (e.g., locked filing cabinets and restricted access to desks);

- organizational measures (e.g., security clearances and limiting access on a “need to know” basis); and
- technological measures (e.g., the use of passwords and encryption).

Authorized ICI MEDICAL COMMUNICATIONS INC employees, agents and mandataries may have access to your personal information as required to fulfill their responsibilities to ICI MEDICAL COMMUNICATIONS INC.

## **Access and Correction**

ICI MEDICAL COMMUNICATIONS INC maintains a file of personal information for individuals for the purposes described in this Privacy Policy, which will be accessible at the address provided in the Contact Information section below. If you wish to request access to or correction of your personal information in our custody or control, you may write to this address, attention Privacy Compliance Officer. Your right to access or correct your personal information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. For more information about the collection, use and disclosure of personal information, including about personal information that is collected, used, disclosed, stored or processed outside of Canada, you may contact us using the contact information listed below.

## **Privacy Policy Changes**

This Privacy Policy may be revised from time to time. We urge you to request and review this Privacy Policy frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this Privacy Policy constitutes your acceptance of any such changes. This Privacy Policy is effective as of December 31, 2019.

## **Contact Information**

Accountability for compliance by KKTG Canada with privacy policies and procedures rests with the Privacy Compliance Officer, even though other individuals within the company may be responsible for the day-to-day collection and processing of personal information. In addition, the Privacy Compliance Officer may, from time to time, designate one or more other individuals within the company to act on his or her behalf, including representatives from all areas of the business.

The contact information for KKTG’s Privacy Compliance Officer is:

Privacy Compliance Officer  
442 Weston Crescent

Kingston, Ontario  
Canada K7M 9E7

Tel: 1-613-888-6844

Email: