

Stepscan Privacy Policy

Introduction

Please read this privacy policy carefully.

This Privacy Policy tells you how we use information that we collect about you through this Stepscan website as well as through our desktop application, communications or other services (collectively the "Services") that link to this Privacy Policy. This Privacy Policy does not apply to situations where we have notified you that an alternative privacy policy applies.

This Privacy Policy also does not apply to data processing activities specifically relating to current or former Stepscan employees or applicants.

We intend to deal with your information in a manner that is fair and in line with your expectations and encourage you to read and consider the information provided in this Privacy Policy to confirm that is the case.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

The information we receive, and how we use it, depends on what you do when visiting our website or using our Services. We collect and use non-personal information (information that does not identify you personally) differently to your personal information.

YOUR PERSONAL INFORMATION

Personal information is information that can specifically identify you, such as your:

- first and last name
- address, telephone number, e-mail address or other contact information
- personal health information
- date of birth or age
- IP (Internet Protocol) address when such address is associated with a specific user

We collect personal information about our users in two ways:

1. When you directly provide information to us to for use with the Stepscan Medical Device (Stepscan Tile System and Software). This information includes, but is not limited to, name, date of birth, height, weight, and gait and balance data recorded by the Stepscan Medical Device.



2. When you directly provide information to us, e.g. by entering personal information on certain pages of the website. For example, you may fill out a registration form for a particular service, participate in a survey, or complete a contact form.
3. Using automated means, specifically through cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

HOW DOES STEPSCAN USE PERSONAL INFORMATION?

We may use the information that you have shared with us through our website and relevant Services for the following purposes:

- to respond to your requests
- to provide the services or information you request (gait and balance assessment data)
- to allow you to register certain products or services, or enhance their functionality
- to resolve and track the status of any consumer and/or product or service issues
- to manage our relationship with you and facilitate any necessary follow up (e.g. by storing relevant information and preferences for a reasonable amount of time)
- to enter into, or perform a contract with you (e.g. in case you wish to order products or services from us)
- to enable you to participate in our online communities, including social media and blogs
- to contact you with information that might be of interest to you – see further the Marketing and Education section below
- In other ways to which you consent

Stepscan may also use your personal information to the extent necessary to achieve the following legitimate interests, so long as compatible with your rights and expectations of privacy:

- for analytical purposes in order to research, develop and improve programs, products, services and content
- to anonymize your information by removing any personal identifiers (your name, e-mail address, social security number, etc.) so that it may be used for other purposes. In this case, the anonymized information would no longer identify you and may be treated like other non-personal information. For more details please see the relevant section below.
- to enforce this Privacy Statement and other rules about your use of our website
- to protect our rights or property

Stepscan also has legal grounds to use your personal information:

- as necessary to protect someone's health, safety or welfare; and
- in order to comply with a law or regulation, court order or other legal process

Where required by law, we will ask you to "opt-in" or affirmatively consent to the processing of your personal data for a particular purpose. For example, where the law so requires, we will only send you newsletters if you have subscribed to them.



WHAT IS SENSITIVE INFORMATION?

Some types of personal information are sensitive information. Sensitive information is personal information revealing or relating to your health, genetic or biometric data, your racial or ethnic origin, etc.

WILL STEPSCAN TREAT SENSITIVE INFORMATION DIFFERENTLY TO OTHER PERSONAL INFORMATION?

Stepscan will only collect and process your sensitive information:

- in ways for which you have given your explicit consent
- to protect the vital interests of you or another person, in cases where your explicit consent cannot be given or reasonably requested
- according to applicable laws which include suitable and specific measures to safeguard your fundamental rights and interests
- where the processing is necessary for medical purposes and we are, under the circumstances, under a duty of confidentiality equivalent to the duty of confidentiality of a health professional
- to establish, exercise, or defend a legal claim

For example:

- We may collect sensitive information directly from you, when you voluntarily provide it to us for a particular purpose (e.g. when you contact us with a question or suggestion about our products and services);
- We may also collect sensitive information about patients through healthcare professionals who we work with to provide technical support for our products or services to you;
- We may collect sensitive information as required by the U.S. Food and Drug Administration, Health Canada, and other governmental authorities in order to assure safe and effective use of our products and services;
- We may collect sensitive information about participants who have explicitly consented to participate in clinical trials, studies, and other research initiatives.

NON-PERSONAL INFORMATION

Non-personal information is information that cannot identify you or be tied to you in any way. Therefore the non-personal information that we collect through our website does not identify you as an individual person, and will not be linked to you. It may include information such as the following:

- the type of web browser software you use (for example, Internet Explorer)
- the name of the domain from which you access the Internet
- the Internet address of the website from which you linked directly to our website
- the date and time you access our website



- which pages you have visited on our website
- the search terms you use
- the links on which you click

If you visit our website to read or download information, such as information about one of our products, we may collect certain non-personal information from your computer. This information is collected from your computer's web browser. If you only read or simply click to download information on our website, we do not collect or learn your name, e-mail address, home address, or any other personal information about you.

WHAT DOES STEPSCAN DO WITH NON-PERSONAL INFORMATION?

We are always looking for ways to better serve you and improve our products, services and website experience. We will use non-personal information from you to make our website more useful to visitors. We may also use non-personal information for other business purposes. For example, we may use non-personal information or aggregate non-personal information to:

- create reports for internal use to develop programs, products, services or content
- adapt or improve the information or services provided

DIRECT MARKETING AND EDUCATIONAL MATERIALS

Stepscan may wish to provide you with educational materials or other information about our products and services, as well as information about clinical trials that might be of interest to you, based on the information you have shared with us and that we have collected through cookies or similar techniques regarding your use of Stepscan websites, social media and blogs.

We will ask you to "opt-in" or affirmatively consent to the use of your personal information for the purposes of such communications, in accordance with applicable laws.

If at any time you decide not to receive any educational, commercial or promotional information related to our products and services or regarding the products or services of our affiliates or service providers, please email us at the contact details listed below and mention "OPT-OUT" in the subject of your email. Alternatively, you may use the opt-out procedure provided in any relevant message you receive from us.

Please note that if you opt not to receive promotional messages from us, we may still continue to send you relevant information for other lawful purposes, such as to administer any account you may have with us, to respond to your requests, to execute agreements with you, or to provide you with information that Stepscan is required by law to provide, e.g. regarding product recalls.



Surveys

From time to time, we may invite you to participate in a survey to determine customer satisfaction levels, identify areas of potential improvement or to carry out market research. We may send you a specific invite to participate in such a survey on the basis of our legitimate interests in conducting the survey, or on the basis of your prior “opt-in” consent to receive such communications, in accordance with applicable laws. You may opt-out of receiving any such future communications in the manner detailed in the section above.

The personal data that is collected for the purpose of the survey may include your email address, phone number, survey results, and any free-text message you may have written in the survey.

We process your personal information as part of the survey for carefully considered and specific business purposes which are in our legitimate interests and which we believe also often benefit you, based on our assessment that our legitimate interests do not override your freedom and data protection rights.

The business purpose of collecting your data is to reply to survey feedback you may have provided, specifically:

- Should you have indicated an issue which we need to take action to resolve
- In order to gain further insight to the experience you have described
- To inform you of any action we might take internally to resolve your issue or enhance your experience

DOES STEPSCAN EVER SHARE PERSONAL INFORMATION WITH THIRD PARTIES?

Stepscan will not share your personal information with a third-party except as described in this Privacy Statement.

In the ordinary course of business, we may share some personal information with Stepscan affiliates or third party companies that we hire to perform services or functions on our behalf.

For example, we may:

- use different vendors or suppliers to ship you products that you order from us. In these cases, we provide the vendor with information to process your order such as your name and mailing address.
- use a service provider to administer certain newsletter or informational mailings that you have signed up for, and provide access to your email address for this purpose.



- use a third-party application or platform to allow us to manage and keep track of our communications with you.
- use our company affiliates to provide services relating to your personal information e.g. we may store your information on a secure server based at our affiliate's site in Europe or North America. For more information on the circumstances in which we may transfer your information to other countries, please see the relevant section below.
- use a third-party application or platform to conduct surveys, which can include storage of the survey feedback.

In all cases we will not share more information than is necessary, and we will not authorize any third parties to keep, disclose or use your information except to provide the requested services in line with the purposes set out above.

Please note that subject to applicable laws, we may disclose your personal information if we believe we are required to do so to comply with any law, regulation, court order, legal or government request. In the unlikely event that all or part of our business is acquired by a third party, your information may be transferred to the new corporate owner insofar as relevant to the business in question and subject to appropriate safeguards being in place.

In addition, we may use and disclose your personal information to third parties if necessary to:

- enforce this Privacy Statement and the other rules about your use of this website, our products or our services
- protect our rights or property
- protect someone's health, safety or welfare
- comply with a law or regulation, court order or other legal process
- investigate or take action in cases of suspected fraud or illegal activities

In addition, please keep in mind that certain areas of our website may be interactive in nature, and allow you to post information that other users can see. If you do not wish to have information viewed publicly, please do not use those sections of the website.

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

We will only keep your personal information for so long as necessary to fulfill the purposes for which we are allowed to use them, as set out in this Privacy Statement. For example, if you tell us that you no longer wish to receive a newsletter from us, we will immediately delete your email address from our mailing list. In case you participate in a program via our website we will delete the personal information provided as part of that program within a reasonable time after its completion (e.g. six months after completion will normally be considered reasonable unless we



have lawful grounds to retain some of the information for longer (e.g. if necessary for validation or to comply with recordkeeping obligations)).

WHAT HAPPENS IF THE PRIVACY STATEMENT CHANGES?

We may change this Privacy Statement at any time and for any reason. If we decide to make a significant change to our Privacy Statement, we will post a notice on the homepage of our website for a period of time after the change is made. We encourage you to review this Privacy Statement each time you visit the website.

WHAT ABOUT PRIVACY ON OTHER WEBSITES?

This website may contain links to other websites. Some of those websites may be operated by Stepscan affiliates, and some may be operated by third parties. This Privacy Statement does not apply to other websites. Therefore whenever you leave our website we recommend that you review the privacy practices that apply to information you provide on other websites. We provide the links for your convenience, but we do not review, control, or monitor the privacy practices of websites operated by others. Neither are we responsible for websites operated by third parties or your business dealings with them.

ARE THERE SPECIAL RULES ABOUT CHILDREN'S PRIVACY?

We care about protecting the online privacy of children. We will not intentionally collect any personal information (such as a child's name or e-mail address) from children under the age of 18 without the consent of someone holding parental responsibility. If you think that we have otherwise collected personal information from someone under the age of 16, please Contact Us.

WHAT ABOUT WEBSITE SECURITY?

Security is very important to us. We also understand that security is important to you. We use industry standard measures to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no website or email transmission is 100% secure and we encourage you to therefore take special care in deciding



what information you send or request via email, and take appropriate precautions such as keeping any usernames and passwords you use confidential.

YOUR RIGHTS

At any time, you may exercise your right to access, rectify and, as the case may be, erase, any personal information relating to you, or restrict the processing of your personal information, in compliance with applicable laws.

You also have the right at any time to object, based on your particular situation, to any use or processing of your personal information which we have based on our legitimate interests.

In case we are processing your personal information in an automated manner as part of a service to you or based on your consent then you also have the right to request a copy of your information in a structured, commonly used and machine-readable format (known as the right to “data portability”).

Such requests can be sent to info@stepscan.com.

Please note that we may ask you to provide proof of identity (such as a copy of your ID card or passport) before we can comply with your request.

If we have based our collection or use of your personal information on your consent then you also have the right to withdraw your consent at any time in the same way as it was given, or by sending a request in the above manner.

You may also at any time, free of charge and without having to provide any justification, opt-out of any direct marketing campaigns and request to no longer receive any promotional material as described above.

HOW TO CONTACT STEPSCAN

If you have questions or comments about this Privacy Statement, please Contact Us at info@stepscan.com.

