

Labtician Ophthalmics Privacy Policy

Last Modified: July 2019

This Privacy Policy explains how Labtician Ophthalmics, Inc. (“Labtician,” “we,” “us,” or “our”) collects, uses, shares, and protects personal information that we receive when you access and use our website (located at www.labtician.com), mobile app(s), account portal(s), or any other websites owned and operated by us or on our behalf (collectively, the “Site”).

In some circumstances, our use of your information will be subject to the requirements of the Health Information Portability and Accountability Act (commonly known as "HIPAA"). For example, when you open an account and submit information regarding a prescription order, that information is subject to HIPAA requirements. In those circumstances, additional protections will also apply to that information (“Personal Health Information”). If you have questions about which policy applies to the information you have submitted, please do not hesitate to contact us.

By accessing or using the Site in any manner, you acknowledge that you have read and understand this Privacy Policy, and you consent to having your information collected and processed as described below.

How to Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at:

Email: privacyaffairs@labtician.com
Phone: 905-829-0055
Address: Winston Park Drive
Oakville, ON
L6H 5V5

I. Information We Collect

We collect Personal Information and non-personal information about you when you access and use the Site.

- *Personal Information* is any information that may personally identify you, such as your first and last name, home or other address, email address, phone number, social security number, prescription(s) or other medical information, or payment information.
- *Non-personal information* is any information other than Personal Information. This may include, for example, information that is about you, but which may not identify you (such as your account access credentials, demographics, healthcare provider, or other similar information) and information about your internet connection, the device you use to access the Site, and details about how you use and navigate the Site.

We may collect this information in the following ways:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Site.
- From third parties.

Information You Provide to Us

Information we collect that you choose to provide to us may include:

- *Registration information.* If you register for an account with us, you will be required to provide us with certain information about you, such as your name, mailing address, phone number, email address, and access credentials (including password).
- *Medical information.* After you register for an account, you may provide us with certain information that could be deemed to be Personal Health Information.
- *Transaction information.* When you make purchases through the Site, you must provide us with financial/payment information (e.g., credit or debit card number) so that we can complete your order. This information is collected on a per order basis and is not retained in our systems. We may also collect details of transactions you carry out through the Site and of the fulfillment of your orders.
- *Communications with us.* We may collect information that you provide us when you choose to contact us for any reason via email, over the phone or through the Site, including for assistance with the Site or an order.

Information We Collect Automatically

As you navigate through and interact with the Site, we may use automated data collection technologies to collect certain non-personal information about your equipment, browsing actions, and patterns, including:

- *Information about your device.* This may include, for instance, information about your computer or device and internet connection, including your IP address, operating system, and browser type.
- *Information about your activity.* This may include, for instance, traffic data, location data, logs, actions taken on the Site, pages viewed, number of page visits, search engine referrals and other referring URLs, metadata, the resources that you access and use on the Site, your responses to ads and promotions on the Site and on sites and apps where we advertise, and other similar information.

The technologies we use for this automated data collection may include:

- *Cookies (or browser cookies).* A cookie is a small file placed on the hard drive of your computer that helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application

can tailor its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of the Site.

- *Flash cookies.* Certain features of the Site may use local stored objects (or “Flash cookies”) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for standard browser cookies.
- *Web beacons.* Site pages and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email, and for other related website statistics (for example, recording the popularity of certain content on the Site and verifying system and server integrity).

Information from Third Parties

In certain instances, we may obtain information about you from third party sources, such as your treating physician (for customized orders). We will generally inform you when we request information about you from such third party sources.

II. How We Use Your Information

We may use the information we collect from and about you for a variety of purposes, including to:

- Create your account profile;
- Process your orders for products supplied by us and administer our invoicing database;
- Otherwise provide products and services to you;
- Develop and improve new and existing products and services;
- Customize the Site to your interests and enhance your overall experience;
- Communicate with you, including with regard to Site updates or in the event we need to contact you about an order;
- Perform internal business processes, such as analyzing data, conducting market research, and identifying trends;
- Enforce this Privacy Policy, the [Terms of Use](#), and any other terms that you have agreed to, including to protect the rights, property, or safety of us or any other person or the copyright-protected content of the Site and our services;
- Comply with applicable law; and
- Enhance the safety and security of our products and the Site, verify your identity, and combat fraud.

We may also use the information in any other way we may describe when you provide it and for any other purpose with your consent.

III. How We Share Your Information

We may share non-personal information that does not identify you without restriction. We will not knowingly sell, share, rent, or otherwise transfer your Personal Information to any third party other than in accordance with this Privacy Policy.

We may share the Personal Information we collect:

- To fulfill the purposes for which you provided it;
- With your consent;
- With our subsidiaries and affiliates;
- With our contractors, service providers, or other third parties we use to support our business;
- With a buyer or other successor in the event of an acquisition, merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Labtician's assets, in which Personal Information we hold is among the assets transferred;
- To enforce or apply this Privacy Policy, our [Terms of Use](#), and any other terms you have agreed to, including for billing and collection purposes; and
- As required by law or based on our good faith belief it is necessary or appropriate.

We do not disclose your Personal Information to any third party for promotional or advertising purposes.

IV. How We Protect Your Information

We take reasonable precautions to ensure that your Personal Information is kept safe from loss or unauthorized access, modification, or disclosure, including by:

- Maintaining physical security of our premises;
- Restricting file access to Personal Information;
- Deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access; and
- Maintaining internal password and security policies.

V. Your Information Choices

Updating Your Information

Since we use your Personal Information to build your customer profile, it is important that the information is accurate and up-to-date. If during the course of your relationship with Labtician,

any of your information changes, please update your account profile or otherwise inform us so that we can make any necessary changes.

We will take reasonable steps to correct any Personal Information we hold about you if you can establish that it is not accurate, complete, or up-to-date.

Closing Your Account

You may close your account with us and uninstall the mobile app at any time. When you close your account, uninstall the mobile app, and stop accessing and otherwise using the Site, we will no longer collect information from you, unless you choose to provide it, for example, by sending us an email. If you ask to delete your account, we proceed to delete it. To do so, please contact us using the contact information at the top of this Privacy Policy.

We will retain certain information about you for as long as necessary in order to provide any Services you have requested. We will retain and use this information as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Opting Out of Cookies and Other Technologies

Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Site may not function properly if the ability to accept cookies is disabled. Turning off the browser's cookies will prevent web beacons from tracking your specific activity. The web beacon may still record an anonymous visit from your IP address, but unique information will not be recorded. If you do not want to receive tracking pixels, you will need to disable HTML images in your email client, and that may affect your ability to view images in other emails that you receive. To find out how to see what cookies have been set and how to reject and delete the cookies, please visit <http://www.aboutcookies.org>.

To learn about which third parties have currently enabled cookies for your browser or mobile device and how to opt-out of some of those cookies, please visit the Network Advertising Initiative's website at <http://optout.networkadvertising.org/#/> or the Digital Advertising Alliance's website at <http://optout.aboutads.info/#/>.

Other Advertising and Behavioral Tracking Options

- *Google analytics.* You can control the information provided to Google and opt out of certain ads provided by Google by using of the of the methods set forth in <http://www.google.com/policies/privacy/partners/> or use the Google Analytics opt out browser add-on at <http://tools.google.com/dlpage/gaoptout?hl=en>.

California Do Not Track Disclosures

Most browsers can be set to send Do Not Track ("DNT") signals to third-party websites requesting them not to track your online activities, which may require you to set your browser to permit

cookies. The Site does not respond to DNT signals at this time. For more details, including how to turn on Do Not Track, please visit www.donottrack.us.

VI. Additional Provisions

Children Under the Age of 13

The Site is not intended for children under the age of thirteen (13), and we do not knowingly collect any personal information from or allow the account registration of anyone under the age of 13.

Links to Other Sites

The Site may contain links to other websites and online services. Please be aware that Labtician does not exercise control over the information, products, services, or policies of third party companies accessible through the Site. We encourage our users to be aware of when they leave the Site, and to read the privacy policies of each and every third party site and online service. This Privacy Policy does not apply to such third party sites or online services.

VII. Changes to This Privacy Policy

We may, at any time and in our sole discretion, change, modify, add to, or remove portions of this Privacy Policy to comply with legal or regulatory requirements, or as otherwise permitted or required by law. It is your responsibility to check this Privacy Policy periodically for changes. Changes are effective immediately upon notice to you, and such notice may be given by any means, including by posting on the Site or by email. Any use of the Site by you after such notice means that you accept and agree to the changes.