

CONFIDENTIALITY AND PRIVACY POLICY

The e-SPACE Aging Well (“e-SPACE”) platform is an online platform that promotes healthy aging through various training, exercises and assessment methods. The IUGM Research Center (CRIUGM; “we”, “our”) that has developed this platform respects your privacy, and this Confidentiality and Privacy Policy summarizes personal information (“Personal Information”, as defined below) that may be collected when you use e-SPACE and how this information may be used by CRIUGM researchers and their collaborators after it is collected. This Confidentiality and Privacy Policy also describes other important aspects regarding the confidentiality of this information.

When you use e-SPACE, or choose to provide us with Personal Information, it is understood that you agree to all the terms of this Confidentiality and Privacy Policy, and this policy also applies to your legal representative if you are under protective supervision, as well as yourself, performing these operations.

If you do not agree to any of the terms of this policy, you should not use e-SPACE or submit Personal Information to us.

You may deactivate your account at any time and withdraw your consent upon reasonable notice. Access to e-SPACE or to some of its functions can only be available to you if you provide us with certain Personal Information when requested. Therefore, if you choose not to provide us with the required Personal Information, we may not be able to provide you with access to the platform or its features.

We reserve the right to modify our Confidentiality and Privacy Policy at any time. We will take into account any changes to this Confidentiality and Privacy Policy to adapt e-SPACE and will indicate the date of its last update on this page. Any changes to this Confidentiality and Privacy Policy will be effective from the date that they are posted on this website or when they are emailed to you, whichever occurs first. By continuing to access and use e-SPACE after these changes, you (as well as your legal representative, if any) agree to be legally bound by this policy, according to the revised terms. Please periodically review this Confidentiality and Privacy Policy to learn about the type of Personal Information collected, as well as the terms governing the use and sharing of this information.

1. What Personal Information does e-SPACE collect?

Personal Information includes information associated with an identifiable individual. This includes your name, address, telephone number, email address, payment information associated with e-SPACE or information that you report in questionnaires included in e-SPACE. We may collect Personal Information that you voluntarily provide while using e-SPACE or in other circumstances when you:

- access e-SPACE;
- confirm that you are a new user;
- create an account;
- communicate with us by email, telephone, mail or any other means of communication;
- provide us with Personal Information by any other means.

The Personal Information we collect may include:

- your full name, date of birth and contact details, such as your address, telephone number or email address;
- the general location of your computer, tablet or mobile device (based on your IP address);
- any other Personal Information that you voluntarily choose to transmit to us or provide when using e-SPACE;
- information concerning your use or experience with e-SPACE and its content.

2. Use and disclosure of your Personal Information

We may use or disclose the Personal Information we collect for the purposes for which it was collected, as set forth in this Confidentiality and Privacy Policy. This information may only be used for other purposes if you have consented to such use.

For example, we may use or disclose your Personal Information to:

- ensure the operation of e-SPACE in accordance with its Terms of Use;
- send you a confirmation email containing a code to verify that you are indeed an e-SPACE user;

- respond to your questions or requests for information;
- carry out surveys, studies, analyses and academic research;
- improve our services in e-SPACE;
- provide you with requested information;
- send you promotional communications that you have agreed to receive;
- achieve other objectives that have been communicated to you and to which you have consented;
- carry out any other operation authorized or required by law.

If you have provided us with Personal Information, but later decide that you no longer want us to send you promotional materials, you may remove your name from the mailing list using the link included in our communications.

We reserve the right to transfer any Personal Information we have about you in the event that we merge with or are acquired by a third party or if such transactions are proposed. We may also use or disclose your Personal Information to third parties if we have reason to believe that the use or disclosure of this information is necessary to: (i) investigate possible violations of law; (ii) identify, contact or bring legal action against an individual who may be violating the terms of an agreement they have entered into with us; (iii) investigate security breaches or cooperate with government authorities in connection with a legal matter, including if we are subject to a subpoena, court order, or request for information from law enforcement or another public law enforcement authority; or (iv) protect our rights, property or ensure our safety.

Personal Information collected online may also be combined with information you provide to us through other sources, including telephone communications. We may also transfer Personal Information collected to third parties who provide services that support our business.

3. Third party apps

The e-SPACE platform may contain third party plug-ins, applications or links to third party websites that are not owned by us, and over which we have no control or administration power (collectively referred to as “**Third Party Applications**”), including, without limitation, social media plug-ins, websites operated by advertisers, licensors, licensees and other third parties. We have no control over the content, operations, policies, terms or other elements of Third Party Applications, and we assume no obligation to review Third Party Applications. We do not necessarily endorse, approve, or sponsor Third Party Applications or

any content, advertising, information, material, product, service, or other material from a third party. Furthermore, we are not responsible for the quality or delivery of products or services offered, accessed, obtained or advertised in such Third Party Applications. Finally, you agree that we shall not be liable for any damages caused by the presentation, distribution or use of information or content from these Third Party Applications. Any activity you engage in with such Third Party Applications is subject to the privacy and other related policies, terms and conditions of use or sale, and rules issued by the operator of such Third Party Applications. All interactions, correspondence, transactions and other transactions that you have with third parties that are associated with e-SPACE (in particular via applications or third party advertisements) involve only you and the third parties (including aspects related to the content of the advertisements, payments, delivery of goods, warranties, privacy and data security, and all other related aspects). We expressly decline all liability in connection with any Third Party Applications.

4. Situations where we collect information through technological means

When you use e-SPACE, we may collect information about your use of the platform, including the frequency of use and the types of features you use (“**Usage Data**”). All usage data collected that is not Personal Information is our exclusive property. This information may include information tracking your e-SPACE usage session, including any crashes or freezes experienced while using e-SPACE. We may also collect other general information (such as the pages you visit and the content you search for). We use this information to better understand how users interact with e-SPACE, conduct research and analysis, and improve the platform and user experience.

5. Approaches used to protect Personal Information

The protection of your Personal Information associated with e-SPACE is important to us. We protect this information by ensuring that we and our third party service providers implement physical, organizational, and technological safeguards to secure your Personal Information from unauthorized use, disclosure, or access. Personal Information may be accessed by individuals within our organization, or by our service providers (third parties), who require access to fulfill the purposes set out above or for other purposes required or permitted by applicable laws.

We retain all such collected Personal Information for as long as necessary to fulfill the purposes for which it was collected and to meet our legal obligations.

Although we have taken direct measures to secure our application, computer systems, and the Personal Information we have collected, and have implemented indirect measures through our third-party service providers, to prevent the use, unauthorized access, disclosure, misuse, modification, or destruction of Personal Information, no security measures can provide absolute protection. Neither we nor our third-party service providers can ensure or warrant the complete security of any information you provide to us.

Some of the Personal Information we have collected may be stored or processed on servers located outside of your jurisdiction of residence, including in the United States, where data protection laws may differ from the jurisdiction in which you live. Accordingly, this information may be subject to access requests by governments, courts, or public law enforcement authorities in such jurisdictions in accordance with the laws applicable there.

6. Access and corrections

You may request access to and correction of your Personal Information collected on e-SPACE if you believe that it is inaccurate. If you have submitted Personal Information to us and wish to review it, or if you would like to have it deleted or corrected, please contact us using the contact information provided below. We will make every effort to accommodate your request. However, in some cases, we may not be able to provide you with access to certain Personal Information under certain circumstances, including if it contains personal information of other individuals, or for legal reasons. In such cases, we will provide you with an objective explanation of why we are unable to provide you with this information. You may also be asked to verify your identity before we grant you access to your Personal Information. For greater certainty, we will have no obligation to provide you with access to, or to provide or delete, any Usage Data or anonymized data that does not contain or constitute Personal Information.

7. Children and parents

We do not knowingly collect Personal Information from children under the age of 18. If a child provides us with Personal Information, their parent or guardian may contact us to delete that information.

8. Third party websites

The e-SPACE platform may include links to third party websites. These other websites may have their own confidentiality and privacy policies and terms and conditions that are not governed by this Policy. We are not responsible for the privacy practices, or the content of websites owned or operated by such third parties. Other websites may collect and process the information collected differently. Hyperlinks in e-SPACE to third party websites and references to products, services or publications do not imply our endorsement of such websites, products, services, or publications.

9. How to contact us

If you have any questions about this Confidentiality and Privacy Policy or about the Personal Information you have provided to us, or if you would like to do any of the following:

- Access Personal Information that you have already provided to us in order to correct or update it, or request its deletion;
- Report any breach of this Confidentiality and Privacy Policy.

Please notify us in writing by contacting the e-SPACE Platform Coordinator (info@e-space.ca).