

# PANDECTA PRIVACY POLICY

## PRIVACY POLICY

**Last Updated on: March 6, 2025**

Pandecta Inc. ("**Pandecta**") considers itself a steward of your personal information. We are committed to clear, fair, and transparent data practices. We have prepared this Privacy Policy to explain the manner in which we collect, use and disclose personal information when you visit our website located at [www.pandecta.ca](http://www.pandecta.ca) (the "**Website**"), purchase our proteomic analysis services (or any other proactive health monitoring and/or risk assessment service or product that we may offer from time to time through the Website or otherwise), or otherwise interact with us.

### **Personal Information**

Personal information is information about you as an individual and allows us to identify and contact you. This information may include your name, contact information (email address, phone number), demographic information (age, gender, ethnicity, etc.), health-related information such as health history, information about your current health, wellbeing and lifestyle habits, medication information and blood sample, as is relevant to the analytical service we provide. We use this information to analyze proteins from your blood sample and generate a personalized report (the "**Report**") that summarizes our analysis and offers recommendations in respect of your health and wellness. If you have a consultation with us or a health care practitioner to review your Report, we or the practitioner will use your personal information to deliver this service. If you purchase our services for the generation of a Report, directly through us or our authorized agents, we (or our authorized third-party payment processor) or our authorized agent will collect your full name and payment information (including billing address, credit card number, expiry date and CVV code) in order to process the transaction and enable Pandecta to provide you with the services you have purchased. If you sign up to receive email or text updates or marketing communications from us, we will collect your email address and/or telephone number in order to send you newsletters and updates that may be tailored to your interests and preferences. You can unsubscribe at any time by clicking the "unsubscribe" link included at the bottom of each email or by replying "STOP" to any of our text messages. Alternatively, you can opt-out of receiving communications by contacting us at the contact information provided in the "Contact Us" section below. We may offer you the opportunity to participate in one of our surveys on an optional basis. We use the information collected through our surveys to help us understand our customers' needs and interests and to develop and improve our services and the Website and we may also participate in medical research projects. We will not use or disclose your personal information, including personal health information, for these projects in a manner that can identify you without obtaining your consent in a manner consistent with applicable law. You do have a choice as to which information to provide, however, not providing some of the information can limit the extent of the services that we can provide.

We do not sell your personal information. We do not share your personal information with any third party, unless (1) you have authorized us to do so, (2) we are legally required to do so, for example, in response to a subpoena, a court order, or other legal process, and/or (3) it is necessary to do so, in order to protect and defend the rights of Pandecta.

### **Why Do We Need Your Personal Information**

We need your personal information to provide you with your unique protein analysis as set forth in the Report. The more information we know about you (age, gender, medical history), the better the analytics (risk assessment), in terms of health and wellness, we can provide. After the test is completed, you can choose if we should store your personal information or discard it. Discarding your personal information will limit the extent of future services that we can provide.

### **Sample Collection**

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We collect biological samples (i.e. blood) for proteomic analysis. This sample is tied to your personal information and used to generate proteomic data. After processing, analysis, and Report generation, the remaining sample will be destroyed. We will not share or sell your blood or proteomic samples.

## **Data Collection**

“Data” refers to the proteomic data. This data will be generated from your blood sample and attached to your personal information for identification purposes. This data will be used to create your personalized analytics which provides insights into your health and wellness state. The more information we have about you, the better analytics we can provide. Once you receive the Report, you can choose, if you so wish, for Pandecta to retain your identifiable information (name, address) or not. We must retain identifiable data if you plan to track your changes in your proteome over time. We do not sell your identifiable data (including data that can be used to identify physical or mental conditions or treatments). We do not share your identifiable data (including data that can be used to identify physical or mental conditions or treatments) with third parties without your explicit consent (received in writing and separate from this agreement).

## **Aggregate Data**

Your data will be combined (and may be modified) with the data from other individuals which we use for statistical analysis and risk assessment. We use aggregate data for multiple purposes including but not limited to, improvement of our current services and the development of future services and/or products (including development of an AI tool and new products and/or services) and for research purposes. Aggregate data is general information and does not contain information that can be used to identify you as an individual. You will be asked to agree to the use of your deidentified data as set forth below for product improvement, research, and other purposes.

## **Take Charge of Your Data**

It is important to us that you understand how your personal information is collected and used by us. Subject to applicable law, you have the right to access, update and correct inaccuracies in, and withdraw consent to our collection, use and disclosure of, your personal information in our custody or control. You may make such a request or withdraw your consent by emailing or writing to us using the contact information set out below. We may request certain personal information for the purpose of verifying your identity. We may update this privacy policy periodically to reflect changes to our privacy practices. We encourage you to periodically review this Privacy Policy on the Website to ensure you are familiar with those changes. We will indicate at the top of this Privacy Policy when it was most recently updated.

## **Communications**

We may use your contact information to communicate with you about our products and services, provide updates, and promotional offers (subject to your right to unsubscribe or opt-out of such communications as described above). We will not share or sell your contact information to others.

## **Data Sharing**

With your consent, we may share your anonymized data with third-party service providers who perform services on our behalf, such as laboratory analysis and data processing. These providers do not know your identity, and proteome itself cannot be used for identification purposes. In addition, these providers are bound by confidentiality agreements and are prohibited from using your data for any other purpose. Similarly, anonymized and/or aggregate data may be shared with research collaborators for scientific studies. These collaborations help advance scientific knowledge and improve public health.

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## **Legal Requirements**

We will disclose your data only when required by law or in response to legally valid requests by public authorities (e.g., court orders). Your personal information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

## **Protection Measures**

We implement a variety of reasonable security measures to ensure the protection of your personal information. This includes encryption, access controls, and secure storage facilities. We restrict access to personal information on a need-to-know basis to authorized personnel and service providers who require access to fulfill their job requirements.

## **Contact Us**

If you have any questions or concerns about this privacy policy or our data practices, please email us at: [info@pandecta.ca](mailto:info@pandecta.ca) or write to us at One Dundas Street West, Suite 2500, Toronto, ON, M5G 1Z3.

## **Acknowledgement**

By accessing our Website, and/or communicating with us, and/or purchasing Pandecta's proteomic analysis services, you acknowledge that you understand our Privacy Policy and you consent to our collection, use and sharing of personal information as per the conditions described in this Privacy Policy and you agree to our Terms of Use and Service as set forth on our Website. In addition, if you purchase our proteomic analysis services, together with the payment therefor, you will have remitted to (or on behalf of Pandecta) a duly completed and signed consent as set forth in Exhibit A.

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## EXHIBIT A CONSENT AND ACKNOWLEDGMENT

	Yes	No
Do you understand this Privacy Policy?*		
Do you agree to the terms described in this Privacy Policy?*		
Do you want us to retain your identifiable information after the report is completed? ( <i>for ongoing monitoring purposes/comparison of your results taken at different timepoints</i> )		
Do you consent to the use of your de-identified data for product improvement (including AI development) and research purposes?*		
Do you consent to sharing your de-identified data with third parties for research purposes only?*		

**\*Please Note:** Answering no to these questions, will make you ineligible for Pandecta's proteomic analysis services.

**Full Name:**

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**Signature:**

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**Date:**

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