

PRIVACY NOTICE

Last updated: May 22, 2019

Privacy Policy Introduction

Your privacy is very important to Inspirata. As such, we are committed to protecting your privacy and want you to be familiar with how we collect, use and disclose personal data. This privacy notice is meant to help you understand our relevant practices, including what data we collect, why we collect it, what we do with it and how we protect it, as well as your individual rights related to how your data is handled and used.

Please note that we have elected to use the phrase personal data for what might also be described as Personally Identifiable Information (PII) based on where you reside and/or how are choosing to engage with Inspirata. This has been done for simplification, with the content of this privacy notice designed to comply with relevant data privacy regulations and codes of practice in all territories where we market our solutions. The key regulation and codes of practices on which this privacy notice is predicated include:

- EU General Data Protection Regulations (GDPR) 2016/679
- CAN-SPAM Act 2003
- California Online Privacy Protection Act 2013
- Children Online Privacy Protection Act 1998
- Personal Information Protection and Electronic Documents Act (PIPEDA) Canada
- Digital Privacy Act Canada 2015
- Fair Information Practices

Privacy Policy Introduction

Inspirata welcomes the interest you have expressed in our company, solutions and services as exemplified by your visit to our website, Inspirata.com. To ensure compliance with all relevant data privacy regulations, our website has been configured to make this privacy notice as conspicuous and easy to find as possible. Similarly, this privacy notice has been designed to detail in a clear and transparent manner how we manage your data when you engage with us via our digital properties, including, but not limited to, our website, social media pages, promotional emails, as well as the domains of our recently acquired

companies Caradigm, USA LLC and Artificial Intelligence in Medicine, Inc. or any other Inspirata-owned digital property that links to this notice.

Please note that in certain circumstances, Inspirata might have a need to process additional personal data beyond that derived from visits to our digital properties and, as such, we will need to invoke a different privacy notice (e.g., in using Inspirata's solution-as-a-service as a customer). Whenever and wherever this is the case, Inspirata will make it clear how and why there is a discrepancy.

Personal Data Collected and Rationale

When using the phrase personal data in our privacy notice, we mean information that relates to you and allows us to identify you, either directly or in combination with any other data we may hold.

Promotional Account Data

When registering on our website, you can choose to sign up for marketing and promotional communications. When doing so, we will use the following personal data:

- First name and surname
- Email address
- Area of Interest

We use this personal data to send you relevant promotional communications — based on your expressed preferences and behavior — about Inspirata solutions, events and promotions. Inspirata may contact you with promotional communications via email and other digital channels, such as social media.

To deliver the most relevant customer experience possible, we will always look to personalize the communications we send. In most instances, this personalization will be based on specific areas of interest entered by you when engaging with us, e.g., when registering on our website you might detail an interest in learning more about digital pathology and, as such, it is this information that determines the materials we send to you. However, in certain circumstances, we might look to refine our communications further by combining the information you have detailed explicitly, with additional information derived through your ongoing engagement with Inspirata, e.g., if you become a customer, we will

possess a clear marker that your interest has progressed and that we should tailor all future communications accordingly. Likewise, based on interaction records, we may notice that the optimal day of the week to send you an email is a Friday afternoon. Adopting this approach ensures that we always send the optimal communication and can refine how we market to different audiences.

Inspirata will always give you the opportunity to withdraw your consent to be sent promotional communications at any time via the unsubscribe link at the bottom of each promotional communication email you may receive.

The processing of personal data for promotional communications is based on your consent. It is provided on a voluntary basis; such basis is lawful under article 6 (a) of Regulation (EC) 5419/16.

Events Data

Inspirata may collect data for conferences, webinars or forums/fairs (“events”) that you may wish to attend and register for via Inspirata.com or via an organizing agency.

When you register for an event, we will process the following information:

- Name
- Email address
- Country
- Salutation
- Product / Service Interest

Furthermore, we may need the following information when you interact with Inspirata as a professional:

- Specialty
- Facility
- Modality
- Products Interested
- Date
- Time Slot
- Business Phone
- Relevant Dietary Information

By registering for an event, you are agreeing to receive communications from Inspirata directly related to the event, such as at what location the event will be hosted and at what time the event takes place.

Social Listening Data

When you interact or communicate on social media channels/ pages /promotions and blogs, e.g., when you click on “like” or “share,” when you post and share comments, your personal data is processed by a third party that provides social listening services to Inspirata. This means that the third party providing social listening services will retain a copy of your online publicly available interactions to which the third party has provided us access.

The personal data collected in these instances includes publicly available data provided in the social media context by you from the relevant social media provider via a third party that provides social listening services such as: profile photo, comments and content you have posted/shared.

We use this personal data to gain a general view of the opinion of people about Inspirata and our brands, and to get an idea of relevant online influencers and to resolve issues and/or improve our products and services and/or start a promotional conversation with you based on questions/requests that you addressed to us.

We consider the processing of Social Listening Data in the above context to be based on a legitimate interest of Inspirata to be lawful under article 6(f) Regulation (EC) 5419/16.

Application of Email

If you opt-in to receive marketing or promotional emails from Inspirata, we will email you in accordance with the stated communication preferences you volunteered and in accordance with relevant laws as they pertain to acceptable email communication. Our emails will never use false or misleading subjects or email addresses, and will clearly identify the message as an advertisement, include the physical address of our business or site headquarters, ensure our email service provider is not contravening compliance in how they deliver the communication, honor opt-out/unsubscribe preferences promptly and enable you to manage your email preferences or unsubscribe by using a link at the bottom of each syndicated email.

Sharing Personal Data with Others

We do not sell or trade your personally identifiable information to outside parties. However, there are certain circumstances in which it may be necessary to disclose your personal data with others.

We may disclose your Personal Data:

- To our affiliates or subsidiaries for the purposes described in this privacy notice.
- To our third-party partners who assist us with services such as website hosting, data analysis, information technology and related infrastructure provision, customer service, email delivery, CRM, identity management, event management, marketing intelligence, auditing and other services.
- Other uses and disclosures
- We may also use and disclose your personal data as we believe to be necessary or appropriate: (a) to comply with applicable law, which may include laws outside your country of residence, to respond to requests from public and government authorities, which may include authorities outside your country of residence, to cooperate with law enforcement or for other legal reasons; (b) to enforce our terms and conditions; and (c) to protect our rights, privacy, safety or property, and/or that of our affiliates or subsidiaries, you or others.
- In addition, we may use, disclose or transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- Third-party services
- This Privacy Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which Inspirata links. The inclusion of a link on Inspirata.com does not imply endorsement of the linked site or service.
- In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer with respect to any personal data you disclose to other organizations through or in connection with Inspirata. These other organizations may have their own privacy notices, statements or policies. We strongly suggest that you review them to understand how your personal data may be processed by those other organizations.

Third-party cookies or other tracking technologies

We use cookies or web beacons/action tags when you interact with us at Inspirata.com – on visiting our websites, using our social media pages and receiving our emails. A cookie is a piece of script that is placed automatically on your computer's hard drive when you access certain websites which, in serving to identify your unique browser, provides a means to personalize and accelerate the speed of your site experience. Web beacons represent script written into the underlying code of the website and are designed to help inform the owner about site performance by recording the instances in which a given action is being undertaken by web visitors, e.g., it might record that you clicked on a video, filled out a form and/or entered the site via a certain page and left by another.

Cookies can assist in different ways, but are typically categorized based on the role they fulfill and the value they provide:

- **Required Cookies** – Used to ensure that the website functions properly. These would be used to ensure any preferences you have expressed in engaging with our site are properly recorded for your next visit.
- **Analytics Cookies** – Used to measure and analyze digital channel usage by visitors at an aggregate level so as to provide a basis for improving performance.
- **Advertising Cookies** – Used to enable online advertising, allowing Inspirata to potentially serve online ads when you leave Inspirata.com associated with an explicit or implicit interest you have expressed during your visit(s) to Inspirata.com.
- **Social Media Cookies** – Used to enable integration of social media into the website, so that you can share or like Inspirata content via your preferred social network.

Web beacons, cookies and other tracking technologies do not automatically gather personally identifiable information about you. This occurs only if you voluntarily submit personally identifiable information, such as registering for or sending e-mails. In these cases, these automatic tracking technologies can be used to provide further information about your use of the websites and/or interactive e-mails to improve their usefulness to you.

You can delete cookies if you wish; while certain cookies are necessary for viewing and navigating on our website, most of the features will be still accessible without cookies. We do not track signals, plant cookies or use advertising when a Do Not Track (DNT) browser mechanism is in place. Likewise, our site does not support third-party behavioral data tracking. For further information about the use of cookies or other similar technologies used and your choices regarding cookies, please read our [Cookie Policy](#).

How do we secure your personal data?

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. Our website is scanned on a regular basis for security holes and known vulnerabilities to ensure your visit is as safe as possible. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below.

How long will the Personal Data be kept?

We will retain your personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Jurisdiction and cross-border transfer

Your personal data may be stored and processed in any country in which we have facilities and/or in which we engage service providers, and by using Inspirata.com you consent to the transfer of information to countries outside of your country of residence, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data.

If you are located in the EEA, your personal data may be transferred to our affiliates or service providers in non-EEA countries that are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as our Binding Corporate Rules for Customer, Supplier and Business Partner Data and/or

standard contractual clauses adopted by the European Commission and/or if the service provider is located in the U.S. and they are a certified member pursuant to the EU/US Privacy Shield, to protect your personal data. You may obtain a copy of these measures by following the link above or via our [data privacy enquiry form](#).

Data Breaches & Redress

In the unlikely event of a data breach, we will notify users within one working day of such discovery. We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

Your rights

Where Inspirata processes your personal data based on consent, you have the right to withdraw your consent at any time. This withdrawal of consent would not affect the legality of previously processed personal data.

If you would like to submit a request to access, rectify, erase, restrict or object to the processing of personal data that you have previously provided to us, or if you would like to submit a request to receive an electronic copy of your personal data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us via our [data privacy enquiry form](#). We will respond to your request in a manner consistent with applicable law.

In your request, please make clear what personal data you would like to have changed, whether you would like to have your personal data purged from our database, or otherwise let us know what restriction you would like to put on our use of your personal data. For your protection, we may only implement requests with respect to the personal data associated with your account, your email address or other account information, that you use to send us your request, and we may need to verify your identity before implementing your request.

You may also opt-out from receiving electronic communications from Inspirata. If you no longer want to receive marketing-related emails, you may opt-out by replying “unsubscribe” as outlined at the bottom of each promotional email you receive from us.

We will comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out. If you make use of (some of) your choices and rights, you may not be able to use, in whole or in part, certain Inspirata services.

Parental Information

The Inspirata website and associated digital properties are not directed to children, as defined under applicable law, and we do not knowingly collect personal data from children. It is, however, Inspirata’s policy to comply with the law when it requires parent or guardian permission before collecting, using or disclosing personal data of children.

If a parent or guardian becomes aware that his or her child has provided us with his or her personal data without their consent, please contact us via our [data privacy enquiry form](#). If we become aware that a child has provided us with personal data, we will delete his/her data from our files.

If you have any questions about this privacy notice or about the way Inspirata uses your personal data, please use our [data privacy enquiry form](#).

Alternatively, you have the right to lodge a complaint with a supervisory authority in your country or region.

You can also contact us by telephone or via the address provided below:

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