This privacy policy (the “Privacy Policy”) describes how MEDTEQ+ (“MEDTEQ+” or “we” or “us”) collects, uses, and shares personal information gathered via the MEDTEQ+ website, Yapla and any related or successor sites, and any related mobile versions of these sites (collectively, the “Website”). We refer to our Website visitors as users (“Users” or “you”). Please read our Terms of Use. By visiting the Website, you accept and consent to the practices described in the Privacy Policy.

Should you have cause to complain about how we handle your personal information, or any questions regarding our Privacy Policy, please contact us in the first instance at:

Camila Esteves  
Governance Coordinator  
740 Notre-Dame Street West,  
Suite 1400 Montreal, QC H3C 3X6  
Tel: 514-398-9772 ext : 2525  
camila.esteves@medteq.ca

1. WHAT TYPES OF INFORMATION DO WE COLLECT?

We collect, use, store and transfer different kinds of personal information about you which we have grouped together follows:

Information you give us. We obtain certain information when you provide it to us (“Contact Information”): for example, if you contact us using the form on our Website, you may provide certain information, including your email, phone, and organization. Some of that information can be used by MEDTEQ+ to identify or contact you directly.

Information we collect about you. We also gather personal information through your use of the Website (“Other Data”). Such information may include: the Internet Protocol (IP) address, unique device identifiers, IDs for advertising, operating system, mobile network information, browser type, existing applications, browsing activity and non-precise device location information (e.g., city or region).

2. HOW DO WE USE INFORMATION?

We may use the Contact Information that you provide to respond to your contact inquiries; provide you with services you have requested and/or customer support; communicate with you about news, events, opportunities, products, or services that may be of interest to you; allow you to take part in competitions, campaigns, promotions or surveys; and provide, develop, improve, and personalize the Website.

MEDTEQ+ analyzes the Other Data to help us determine how Users access parts of the Website and who our Users are. By recognizing patterns and trends in usage, we are able to better design the Website to improve Users’ experiences, both in terms of content and ease of use.
We will only use your personal information for the purposes for which we collected it.

3. HOW DO WE SHARE INFORMATION?

We will only share the Contact Information you give us as described in this Privacy Policy, or with your express permission. When we have obtained your permission, we may share your Contact Information with our partners and affiliates as necessary to contact you or provide you with requested services. We do not sell your Contact Information to third parties.

We may share the Other Data with third parties, including but not limited to sponsors, advisors, advertisers, analytics providers, and investors, for the purpose of conducting our business. MEDTEQ+ uses Google Analytics to track aggregated visitor data, which does not include any personal information. We reserve the right to disclose to third parties anonymized, aggregated Other Data collected for any lawful purpose.

MEDTEQ+ may disclose any personal information which we hold on you to third parties when obligated or permitted to do so by law and in order to investigate, prevent, or take action regarding suspected, or actual unlawful activities, including but not limited to fraud and situations involving potential threats to the physical safety of any person.

4. SECURITY

We use reasonable measures to protect information from loss, theft, alteration, or misuse. However, please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee the security of your personal information, and any transmission of your personal information to us is at your own risk. We are not responsible for third party circumvention of any privacy settings or security measures.

5. COOKIES AND DO NOT TRACK

MEDTEQ+ may allow third-party service providers to use cookies, tracking pixels, and other technologies to collect information and to track browsing activity over time and across third party websites. The providers of these services may use your IP address or an anonymous identifier as well as certain information from your browser, together with Other Data about your visits to our Website and other sites, to provide analytical information for our Website and other sites. Like many other websites, we use Google Analytics. Traffic and usage data collected by Google (obtained through Google cookies on the Website) is subject to Google’s privacy policy. Per the applicable Google Analytics service terms, Google does not collect Contact Information in connection with those services. Note that Google offers a Google Analytics browser add-on (designed to be compatible only with certain browsers) to provide website visitors the ability to prevent their data from being collected and used by Google Analytics. That add-on may be obtained here: https://tools.google.com/dlpage/gaoptout?hl=en; and other privacy controls are available here: www.google.com/analytics/learn/privacy.html. Please be aware that if you decide to disable or block cookies, parts of the Website may not function correctly, or at all.
We do not control the third-party technologies whose services we use to improve the Website, and their use is governed by the privacy policies of third parties using such technologies. For more information about third party advertising networks and similar entities that use these technologies, see http://www.aboutads.info/consumers, and to opt-out of such ad networks’ and services’ advertising practices, go to www.aboutads.info/choices. Once you click the link, you may choose to opt-out of such advertising from all participating advertising companies or only advertising provided by specific advertising companies.

Other than as described herein, Euroconsult and Innovitech do not track your activity over time and across different websites or online services except as among the related sites that constitute MEDTEQ+ Website and as otherwise described herein, and we do not currently respond to browsers’ Do Not Track signals with respect to the Website. We do not permit our third-party service providers to collect information from the Website for other sites or for their own purposes other than as described in the preceding paragraph.

6. LINKS TO OTHER SITES

The Website contains links to other sites belonging to third parties. These websites are not covered by this Privacy Policy and we are not responsible for the privacy practices within any of these other websites. You should be aware of this when you leave the Website and we encourage you to read the privacy statements of other websites.

7. INDIVIDUAL RIGHTS

You have a number of rights in relation to how we process your personal information. These include:

• The right access the personal information that we may hold about you;

• The right to rectify any inaccurate personal information that we may hold about you;

• The right to have your personal information erased in certain circumstances, for example, where it is no longer necessary for us to process your personal information to fulfil our processing purposes; where you object to your data being processed on certain grounds (for example, for marketing purposes) or where your personal information is being unlawfully processed; and

• The right, in certain limited circumstances, to have your data ported to a new service provider if you no longer wish to use the Website or our services.

You can exercise any of these rights any time by contacting us. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights).
This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**Basis upon which we process your personal information**

We will process your personal information where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate Interest means the interest of our organization in conducting and managing our business to enable us to give the best possible service to our members and the best and most secure experience on our Website. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

You have the right to make a complaint at any time to the supervisory authority for data protection issues within your jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

**Data retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.