



## Privacy Notice

### 1. INTRODUCTION

Biospective Inc. and its affiliates, including MOVE, a division of Biospective (together, “**Biospective**”, “**we**”, “**our**”, or “**us**”), is committed to the protection of privacy and the preservation of the confidentiality of Personal Information (as defined below). The purpose of this Personal Information Protection Notice (“**Privacy Notice**”) is to demonstrate the commitment of Biospective to the protection of privacy, as well as to inform you about the types of Personal Information that Biospective collects, uses, and discloses, including in connection with its websites, and the purposes for such collection, use, and disclosure of Personal Information. This Privacy Notice also governs the Personal Information collected about users accessing pages on any of the following Biospective websites (collectively, the “**Sites**”):

<https://moveresearch.com>

<https://recite.moveapps.ca>

<https://eligibility.horizon.mygretel.ai>

<https://study.horizon.mygretel.ai>

<https://www.biospective.com>

This Privacy Notice also explains how we use and share the personal information that we collect from people who visit our websites. It also explains how we use cookies and similar technologies.

From time to time, we may make changes to this Privacy Notice. The Privacy Notice is current as of the “last updated” date, which appears at the bottom of this Privacy Notice. We will treat Personal Information in a manner consistent with any applicable laws and with this Privacy Notice, unless we have your consent to treat it differently.

### 2. DEFINITIONS

- a. “**Consent**” means any freely given, specific, informed and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the Processing of Personal Information relating to you.
- b. “**Controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information.
- c. “**Intermediary**” means a natural or legal person, public authority, agency or other body which processes Personal Information on behalf of Biospective.
- d. “**Participant**” refers to any individual participating or having a wish to participate in a study conducted by Biospective.



- e. **“Personal Information”** means any information or set of information that identifies or could be used to identify you, either directly or indirectly. Personal Information does not include information that is anonymized such that an individual cannot be identified.
- f. **“Personal Information Breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information transmitted, stored or otherwise processed.
- g. **“Processing”** means any operation or set of operations performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- h. **“Recipient”** means a natural or legal person, public authority, agency or another body, to which the Personal Information is disclosed, whether a third party or not.
- i. **“Visitor”** refers to any specific individual as an identified or identifiable natural person visiting a Site.

### 3. ACCOUNTABILITY

Biospective is responsible for, and will be able to, demonstrate compliance with this Privacy Notice, and has designated an individual or individuals accountable for Biospective’s compliance with the Privacy Notice.

Accountability for Biospective’s compliance with this Privacy Notice rests with the designated individual(s), even though other individuals within Biospective may be responsible for the day-to-day collection and Processing of Personal Information. Other individuals within Biospective may be delegated to act on behalf of the designated individual(s).

The identity of the individual(s) designated by Biospective to oversee Biospective’s compliance with this Privacy Notice will be made known upon request if not specified herein.

Any reference to Biospective in this Privacy Notice refers to situations where Biospective acts as Controller and excludes situations where Biospective acts as Intermediary, unless specified otherwise.

### 4. COLLECTION AND USE

#### a. Website Visitors

If you are only a Visitor to our Sites and not a registered Participant, then this section applies to you.

Biospective may collect and Process certain Personal Information on Visitors, notably, time and date of visits, geo-location data, length of time spent on the Site and pages clicked on, provenance and IP address. For such Processing, we may use cookies and collate information collected by way of pageview activity. We may Process any Personal



Information that you specifically Consent to provide to us through our Sites' forms. Any Personal Information provided thereof is only used for the purposes for which you have Consented.

i. Purpose of collecting and Processing Personal Information

Biospective uses the Processed Personal Information to communicate with Visitors, to customize content for Visitors, and to improve its Sites by analyzing how Visitors navigate our Sites. Personal Information is only collected for purposes for which you Consent.

When Personal Information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified and documented prior to Processing and Biospective will provide you prior to that further Processing with information on that other purpose and with any relevant further information. Unless the new purpose is required by law, your Consent will be requested before Personal Information can be used for that purpose.

If the purposes for which Biospective Processes Personal Information do not or do no longer require your identification by Biospective, Biospective will not be obliged to maintain, acquire, or Process additional information in order to identify you for the sole purpose of complying with applicable laws and regulations. However, in such cases, Biospective will not refuse to take additional information that you provide in order to support the exercise of your rights relating to Processing of your Personal Information.

ii. Sharing Personal Information

We may share your Personal Information with our corporate affiliates and with third parties for our legitimate business purposes as permitted by law, as long as such affiliates or third parties have agreed in writing to protect and not further disclose your Personal Information. For example, we may share your Personal Information with suppliers who perform services on our behalf. If Biospective (or part of its business) is sold or otherwise changes control, owners would have access to your Personal Information for the uses specified in this Privacy Notice.

If you provide us with a review or comment, you authorize us to publish it on all of our platforms. You also authorize us to aggregate it with other reviews.

We may disclose Personal Information if required by law, for example to law enforcement or other authorities. This requirement includes court orders, subpoenas and orders arising from legal processes, and administrative or criminal investigations. We may also disclose your Personal Information if the disclosure is necessary for the prevention, detection, or prosecution of criminal acts or to prevent other damage, or in response to a legal action or to enforce our rights and claims.

We may also share anonymous aggregated usage information with others.



### iii. Cookies

When you visit our Sites, we may collect technical information by electronic means such as cookies. We use this information to measure and improve the effectiveness of our Sites or to enhance the Visitor experience. Cookies are a technology that allows a website to remember you. You have the option to completely block cookies, but many functions of many websites may no longer be accessible. You also have the option to leave cookies functional, but to disable information sharing between different websites (third-party cookies), which increases the privacy protection while still allowing you to use the different websites to their own full potential. If you want to change the way cookies are managed, here is the list of the online help pages of the main browsers that can be of help:

- [Mozilla Firefox](#)
- [Chrome](#)
- [Safari \(Mac\)](#)
- [Safari \(iOS\)](#)
- [Internet Explorer](#)
- [Microsoft Edge](#)

We treat information from cookies as Personal Information when associated with your account or contact information.

### iv. Links to other sites

Please be aware that while visiting our Sites, Visitors can follow links to other websites that are beyond our sphere of influence. Biospective is not responsible for the content or privacy policy of these other websites.

## **b. Participants**

Participants should be aware that in registering with us and as part of that registration process, certain Personal Information is collected. This information is collected entirely with your Consent.

### i. Purpose of collecting and processing Personal Information

Biospective uses information collected for determining eligibility for studies the Participant may wish to participate in. If the Participant volunteers for a study and goes through the screening process, Biospective will, as part of an *Informed Consent Form*, provide notice to individuals in a clear and conspicuous language about how their information will be used, disclosed, and transferred; what informational rights they have; and who to contact with any questions or complaints. These notices are tailored to specific situations of data collection.

When Personal Information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified and documented prior to Processing and Biospective will provide you prior to that further Processing with information on that other purpose and with any relevant further information.



Unless the new purpose is required by law, your Consent will be requested before Personal Information can be used for that purpose.

If the purposes for which Biospective Processes Personal Information do not or no longer require your identification by Biospective, Biospective will not be obliged to maintain, acquire or Process additional information in order to identify you for the sole purpose of complying with applicable laws and regulations. However, in such cases, Biospective will not refuse to take additional information that you provide in order to support the exercise of your rights relating to Processing of your Personal Information.

In the eventuality of a conflict of interpretation between the *Informed Consent Form* and the present Privacy Notice, the *Informed Consent Form* shall prevail.

ii. Sharing Personal Information

Except as specified in an *Informed Consent Form*, we do not share your Personal Information except with business affiliates participating in the running of the study as long as such affiliates have agreed in writing to protect and not further disclose your Personal Information, or as Pseudonymized data (meaning that the data is kept, but that the name of the participant is not part of that data) as part of the study record and as required by regulations.

## 5. CONSENT

Your Consent to the Processing of your Personal Information will be unambiguous, manifest, freely given and enlightened, and will be given for specific purposes by a statement or by a clear affirmative action. Such Consent will be valid only for the length of time needed to achieve the purposes for which it was requested.

Biospective will be able to demonstrate that you have Consented to Processing of your Personal Information where such Processing is based on Consent.

Typically, Biospective will seek Consent for the Processing of the Personal Information at or before the time of collection. In certain circumstances, Consent with respect to Processing may be sought after the Personal Information has been collected but before use (for example, when Biospective wants to use Personal Information for a purpose not previously identified).

To make the Consent meaningful, the purposes for which the Personal Information will be used will be stated in such a manner that you can reasonably understand how the Personal Information may be used or disclosed.

Biospective will not, as a condition of the performance of a contract, including the supply of a product or service, require your Consent to the Processing of Personal Information beyond that required for the performance of that contract or to otherwise fulfil the purposes.



The form of the Consent sought by Biospective may vary, depending upon the circumstances and the type of Personal Information. In determining the form of Consent to use, Biospective will take into account the sensitivity of the Personal Information.

The way in which Biospective seeks Consent may vary, depending on the circumstances and the type of Personal Information collected. Biospective will generally seek express Consent when the Personal Information is likely to be considered sensitive. Implied Consent may generally be appropriate when the Personal Information is less sensitive. Consent can also be given by an authorized representative (such as a legal guardian or a person having power of attorney). Consent will not be obtained through deception.

You can give Consent in many ways. For example:

- an online application form may be used to seek Consent, collect Personal Information and inform you of the use that will be made of the Personal Information. By completing and sending the form, you are giving Consent to the collection and the specified uses;
- a checkbox may be used to allow you to expressly agree that your name and address be given to other organizations;
- Consent may be given orally when Personal Information is collected over the telephone; or
- Consent may be given at the time that you use a product or service.

If your Consent is given in the context of a written declaration which also concerns other matters, the request for Consent will be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language.

You may withdraw Consent at any time, subject to legal or contractual restrictions and reasonable notice, as easily as it is to give Consent. Such withdrawal will not affect the lawfulness of Processing based on Consent before its withdrawal, and you be informed thereof prior to giving Consent.

Consent to the disclosure of Personal Information from a third party may be given by you to Biospective in order to collect the Personal Information from the third party.

Biospective will collect Personal Information only from you, unless you Consent to collection from third parties. However, Biospective may, without your Consent, collect Personal Information from a third person party if the law so authorizes. It may also do so if it has a serious and legitimate reason and either of the following conditions is fulfilled:

- the Personal Information is collected in your interest and cannot be collected from you in due time; or
- collection from a third party is necessary to ensure the accuracy of the Personal Information.

Biospective may choose to refrain from requiring your Consent for the Processing of Personal Information relating to you if and to the extent that Processing is necessary:

- (a) for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- (b) for compliance with a legal obligation to which Biospective is subject;



- (c) in order to protect your vital interests or those of another natural person;
- (d) for the performance of a task carried out in the public interest or in the exercise of official authority vested in Biospective;
- (e) for the purposes of the legitimate interests pursued by Biospective or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of Personal Information.

## 6. DISCLOSURE OF DANGEROUS BEHAVIOUR

Biospective understands that some behaviours, speech, or written communication may require that Biospective finds itself in a position where it is forced to divulge some of your Personal Information or other confidential information to a third party without your Consent. With the purpose of respecting both the professional ethical obligations of Biospective's personnel and the safety of the public, Biospective may decide to communicate Personal Information or other information, that would otherwise be maintained confidential, in order to prevent an act of violence, including a suicide, where any of Biospective's research personnel has a reasonable cause to believe that there is a serious risk of death or Serious Bodily Injury (as defined hereunder) threatening a person or an identifiable group of persons and where the nature of the threat generates a sense of urgency.

For the purpose of this Section 6, "**Serious Bodily Injury**" means any physical or psychological injury that is significantly detrimental to the physical integrity or the health or well-being of a person or an identifiable group of persons.

Biospective reserves the right to communicate such Personal Information or other confidential information to the person exposed to the danger or that person's representative, and to the persons who can come to that person's aid, including a peace officer. In such a case, Biospective undertakes to communicate only such information as is necessary to prevent such act of violence.

Each time Biospective communicates Personal Information or other confidential information to a third party without your Consent in accordance with the provision of this Section 6, Biospective shall note in your file (and establish such file if none exists), for each communication, the date and time of the communication, the identity of the person exposed to the danger, the identity of the person to whom the communication was made, the act of violence it was intended to prevent, the danger identified and its imminence, and finally, the information communicated.

## 7. FAIRNESS AND LAWFULNESS

Biospective may establish a file on you. Biospective, when establishing a file on you or recording Personal Information in such a file, will make an entry indicating the source of any Personal Information collected from a third party when the third party is a person carrying on an enterprise. The entry is part of your file.

Biospective may not refuse to respond to a request for goods or services or to a request relating to employment by reason of the applicant's refusal to disclose Personal Information except where:

- collection of that Personal Information is necessary for the conclusion or performance of a contract, notably any participation to a Biospective study;



- collection of that Personal Information is authorized by law; or
- there are reasonable grounds to believe that the request is not lawful.

## **8. RETENTION AND DELETION**

Biospective will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations. In accordance with regulations, if you have been screened for, or participated in, a study then your data may not be deleted and must be kept on file. If you have applied to participate in a study and then requested that your data be deleted, even if you have not participated nor been screened for a study as noted above, you will be ineligible to apply for another study for a period of one year, and your name will be kept on file for one year to ensure that the eligibility requirement is met, but all other information will be deleted immediately.

## **9. ACCESSING AND RECTIFYING YOUR PERSONAL INFORMATION**

You are entitled at any time to obtain information about your Personal Information that we store, in accordance with applicable law. In some cases, we may ask you to pay a reasonable fee before we provide the information, if permitted by applicable law. We may request proof of your identity before providing this information. We may not be able to allow you to access certain Personal Information in some cases. For example, if your Personal Information is connected with Personal Information of other persons, or for legal reasons. In such cases, we will provide you with an explanation why you cannot obtain this information. You can also withdraw your Consent to the use of your Personal Information at any time by contacting us at the address below. You can demand deletion or rectification of your Personal Information; however, statutory provisions, especially those affecting Biospective study conduct, accounting, processing of claims, and mandatory data retention may prohibit deletion or anonymization.

If Biospective does not take action on your request, Biospective will inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a statutorily-empowered public authority and seeking a judicial remedy.

## **10. SAFEGUARDS**

Personal Information will be protected by security safeguards appropriate to the sensitivity of the Personal Information, including protection against unauthorized or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

### **a. Security measures**

Biospective will take the security measures necessary to ensure the protection of the Personal Information processed and that are reasonable given the sensitivity of the Personal Information, the purposes for which it is to be used, the quantity and distribution of the Personal Information and the medium on which it is stored.

The security safeguards of Biospective will protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.





The nature of the safeguards will vary depending on the sensitivity of the Personal Information that has been collected, the amount, distribution and format of the Personal Information, and the method of storage.

The methods of protection will include:

- physical measures;
- organizational measures; and
- technological measures.

Biospective will make its employees aware of the importance of maintaining the confidentiality of Personal Information, and care will be used in the disposal or destruction of Personal Information, to prevent unauthorized parties from gaining access to the Personal Information.

## **b. Intermediaries**

Where Processing is to be carried out on behalf of Biospective, Biospective will use only Intermediaries providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that Processing will meet the requirements of the applicable laws and regulations and ensure the protection of your rights. The Intermediary and any person acting under the authority of Biospective or of the Intermediary, who has access to Personal Information, will not process those data except on instructions from Biospective, unless legally required to do so by a statutorily-empowered public authority.

## **c. Notification of a Personal Information Breach**

Biospective will document any Personal Information Breaches, comprising the facts relating to the Personal Information Breach, its effects and the remedial action taken without undue delay and, where feasible, promptly after having become aware of it, notify the Personal Information Breach to the statutorily-empowered public authority appropriate in accordance with applicable laws and regulations, unless the Personal Information Breach is unlikely to result in a risk to the rights and freedoms of natural persons. Such notification will at least:

- (i) describe the nature of the Personal Information Breach including, where possible, the categories and approximate number of individuals concerned and the categories and approximate number of Personal Information records concerned;
- (ii) communicate the name and contact details of the Privacy Officer or other contact point where more information can be obtained;
- (iii) describe the likely consequences of the Personal Information Breach;
- (iv) describe the measures taken or proposed to be taken by Biospective to address the Personal Information Breach, including, where appropriate, measures to mitigate its possible adverse effects.

Biospective will communicate the Personal Information Breach to you without undue delay when the Personal Information Breach is likely to result in a high risk to the rights and freedoms of natural persons. Such communication will describe in clear and plain language the nature of the Personal Information Breach, and contain at least the information and measures referred to in points (ii), (iii), and (iv) above.



## **11. OPENNESS AND TRANSPARENCY**

Biospective will make readily available to you, specific information about its policies and practices relating to the management of Personal Information.

Biospective is open about its policies and practices with respect to the management of Personal Information. You will be able to acquire information about Biospective's policies and practices without unreasonable effort. This information will be made available in a form that is generally understandable.

Biospective may make information on its policies and practices regarding Personal Information Protection available in a variety of ways. The method chosen depends on the nature of its business and other considerations.

More specifically, whether Personal Information is collected from you, or has not been obtained from you, Biospective will, at the time when Personal Information is obtained (or, where Personal Information has not been obtained from you, within a reasonable period after obtaining the Personal Information, having regard to the specific circumstances in which the Personal Information is processed), provide you with the following information, unless (i) you already have it, or (ii) the provision of such information proves impossible or would involve a disproportionate effort, or (iii) the Personal Information must remain confidential subject to an obligation of professional secrecy:

- (a) identity and contact details of Biospective's representatives (including the representatives' titles and addresses) accountable for Biospective's policies and practices and to whom complaints or inquiries can be forwarded
- (b) the purposes of the Processing for which the Personal Information is intended as well as the legal basis for the Processing
- (c) a description of the type of Personal Information held by Biospective, including a general account of its use, and the categories of Personal Information concerned
- (d) the Recipients or categories of Recipients of the Personal Information, if any, including what Personal Information is made available to related organizations (e.g. affiliates such as subsidiaries and parent organizations)

## **12. CHALLENGING COMPLIANCE**

You may address a challenge concerning Biospective's compliance with this Policy to the designated individual(s) accountable for such compliance.

Biospective has put procedures in place to receive and respond to complaints or inquiries about its policies and practices relating to the handling of Personal Information. The complaint procedure is meant to be easily accessible and simple to use.

Biospective will inform individuals who make inquiries or lodge complaints of the existence of the relevant complaint procedure.

Biospective will investigate all complaints. If a complaint is found to be justified, Biospective will take appropriate measures, including, if necessary, amending its policies and practices.



When a challenge is not resolved to your satisfaction, the substance of the unresolved challenge will be recorded by Biospective.

### **13. CHANGES TO THIS PRIVACY NOTICE**

We may modify this Privacy Notice at any time and without prior notice. We will notify you of material changes to how we use your Personal Information prior to implementing them. We may notify you about such material changes by email or prominent notice on our Sites. By using our Sites after we post these changes, you are indicating that you accept these changes.

### **14. CONTACT US**

You may contact us to exercise your rights, or if you have questions about our privacy practices or need assistance with exercising or understanding your privacy choices.

If you are a participant in a MOVE research study, please contact us at [privacy@moveresearch.com](mailto:privacy@moveresearch.com), or you may write to:

Biospective Inc.  
Attn: MOVE Privacy Officer  
1255 Peel Street, Suite 560  
Montreal, Quebec H3B 2T9  
Canada

For other inquiries, please contact us at [privacy@biospective.com](mailto:privacy@biospective.com), or you may write to:

Biospective Inc.  
Attn: Biospective Privacy Officer  
1255 Peel Street, Suite 560  
Montreal, Quebec H3B 2T9  
Canada

### **15. ACKNOWLEDGMENT**

By providing Personal Information to Biospective you recognize that you have consented, expressly, freely, and in full awareness to the collection, use, and disclosure of your Personal Information by Biospective for the purposes specified in the Privacy Notice or otherwise as identified to you at the time of collection of the Personal information.

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