

COGNITO COACH™

Confidentiality and privacy policy

1. PROTECTION OF YOUR PERSONAL INFORMATION

This Privacy and Confidentiality Policy (the "Policy") explains the types of personal information that are collected in the course of providing the service (as defined in the Terms of Use and Non-Exclusive License for the service, which can be consulted by clicking on the following hyperlink <https://www.cognitocoach.com/legal/utilisation.pdf> (the "Terms of Use")) by Dipôle Solutions inc. ("Cognito Coach™", "Cognito™", "Cognito-app™") in favor of the client, the use of these and the contexts of disclosure. Cognito Coach™ understands the importance of protecting the personal information of its clients and is committed to respecting their right to privacy. For the purposes of this Privacy Policy, the term "customer" refers to you, as an individual, or to the legal entity receiving the service, its subsidiaries and other affiliates. If you do not have the authority to do so, or if you do not agree with the provisions of this policy, please do not use the service.

Please note that Cognito Coach™ may change this policy at its sole discretion and without notice. It is your responsibility to review the terms of the Policy for changes from time to time. The collection, use and disclosure of your personal information will be subject to the version of the Policy then in effect, which is the version posted on the Cognito Coach™ customer interface and available through the use of the Service on any given date.

This Policy is an integral part of the Terms of Use.

2. DEFINITION OF PERSONAL INFORMATION

Personal information is any factual or subjective information about an identifiable individual. However, Personal Information does not include business contact information, if such contact information is used to communicate with an individual in connection with his or her employment, occupation or profession.

3. CONSENT

Subject to certain exceptions, Cognito Coach™ shall obtain the consent of the client for the collection, use and disclosure of Personal Information. Consent may be express or implied. Consent must also be meaningful, that is, the client must understand the nature, purpose and impact of the collection, use or disclosure of personal information to which they are consenting. Consent may be provided orally, in writing, electronically, or by a person acting on behalf of the customer, such as an agent or attorney duly authorized for that purpose. Express consent is generally given when the client completes and signs an application or enrollment form and submits it to Cognito Coach™. Implied consent occurs when Cognito Coach™ can reasonably infer that the client has consented, as a result of action or inaction on the part of the client, or because of the circumstances.

Please be advised that your use of the Service confirms that you are at least the age of majority in your place of residence.

4. COLLECTION OF INFORMATION

Cognito Coach™ limits the collection of personal information to that which is necessary for the stated purposes. Any collection of personal information of the customer made in the context of the payment of the subscription fee to the service through the online payment platform used by Cognito Coach™ will be subject to the terms of confidentiality and protection of personal information applicable to the use of this payment platform. It is not safe to transmit your payment data, including your credit card number, by email, SMS or through social media. In order to protect this data, please only transmit it through the online payment platform used by Cognito Coach™.

5. USE OF INFORMATION

5.1 Essentially, the personal information collected allows Cognito Coach™ to identify the client, to communicate with him and to personalize its service. Cognito Coach™ reserves the right to use the personal information obtained to conduct market research in order to adequately meet the needs of its customers and thus improve its service.

5.2 If you have consented to have your email address added to Cognito Coach™ mailing list, you may, at any time, choose to no longer receive marketing communications or the newsletter sent by email by unsubscribing using the hyperlink included in these communications.

5.3 Cognito Coach™ does not sell personal information about its clients to third parties and does not use or disclose such personal information for purposes other than those for which it is collected.

5.4 Applicable laws and regulations provide for certain exceptions to this Policy and the use of your personal information. These exceptions may affect privacy practices. For example, Cognito Coach™ may collect, use or disclose the personal information of its clients in the following situations:

- (a) if the collection of information is clearly for your benefit and your consent cannot be obtained in a timely manner;
- (b) if the information is deemed by law to be in the public domain
- (c) if the information is disclosed to government authorities under anti-money laundering and anti-terrorist financing laws; or
- (d) in connection with tax returns to the appropriate authorities or other disclosures required by law.

6. THIRD PARTY SERVICES

6.1 When used herein, the term "Third Party Services" means computer programs, websites, of a third party to which you voluntarily grant access in connection with the use of Cognito Coach™. Your use of the Third Party Service is subject to the policies of the Third Party Service. We advise you to read the terms and conditions of the policies of the third party sites you use.

6.2 Cognito Coach™ use of information received through APIs from third party services (Google, Microsoft, Apple, Stripe, PayPal, Zapier...) will comply with the user data policy of the API services, including the limited use requirements determined by them.

6.3 Google: When you click on "Authorize Google", you will be automatically redirected to the Google OAuth API page, via an SSL (Secured Socket Layer) connection. Cognito Coach™ will ask you for specific access permissions to allow us to connect to your Google

calendar. Once these permissions are obtained, we must save the authorization token in order to continue accessing your calendar, in order to continuously synchronize with our users' COGNITO subscription. This server is encrypted and secure. Our goal is to allow you to view all your calendars in a centralized view.

We then use this information in the following two ways:

a) the agendas selected to be displayed in the Cognito Coach™ calendar will allow you to consult, without the possibility of modification, the summary of these events;

b) the destination calendar for Cognito Coach™ activities will allow Cognito Coach™ activities to be synchronized with events in this calendar. These events can be added/modified/deleted, depending on the actions taken on the associated Cognito Coach™ activities in Cognito Coach™. You can log out of your Google account at any time.

7. PROTECTION OF INFORMATION

Cognito Coach™ employs physical, organizational and technological security measures to protect customer personal information from unauthorized access, disclosure, copying, use or modification, as well as from loss or theft. Cognito Coach™ uses the Secure Sockets Layer (SSL) protocol on all pages where personal data is collected. This protocol encrypts information before it is sent to Cognito Coach™. Cognito Coach™ computer systems, including those of its subcontractors and hosting partners from whom Cognito Coach™ obtains hardware, software, networks, storage space and related technology to operate and maintain the Service, are password-protected and are configured so that only those individuals who need access to your personal information for the purposes of their position with Cognito Coach™ are authorized to access the secure systems and databases.

8. COOKIES, SOCIAL MEDIA AND BLOGGING

8.1 In order to ensure proper management of the service, Cognito Coach™ collects the usual data from Internet log files, including your IP address, browser type and language, access frequency and website referral addresses, including through the use of various types of cookies and conversion tags. Cognito Coach™ does not profile your computer or

extract any information from your hard drive. Most browsers are configured by default to accept cookies, but you can change your browser settings to refuse or limit their use.

8.2 In addition, the Service includes certain social media features. These features may, among other things, collect your IP address and leave a cookie to enable the feature. The social media features and widgets are hosted by a third party. Your interactions with these features are governed by the privacy and confidentiality policy of the company that provides them.

8.4 Cognito Coach™ does not endorse the opinions expressed in the comments posted by users of its blog and does not verify the accuracy of such comments. Cognito Coach™ reserves the right to modify or delete any disrespectful, offensive, abusive or discriminatory message, question, or comment at its discretion.

9. ACCESS TO INFORMATION AND QUESTIONS

In accordance with the provisions of the law, you have the right to access, rectify, modify, or delete personal information held by Cognito Coach™. To do so, or if you have any questions or concerns about the protection of your personal information, please contact Cognito Coach™' customer service department by e-mail at the following address: support@cognitocoach.com.

10. VERSIONS

In the event of a discrepancy between the English and French versions of this Policy, the French version shall prevail.

Translated from the original language, French.