

Thank you for visiting the Platform. Please read this Privacy Policy (the “Privacy Policy”) carefully.

By accessing or using the Platform, you agree to comply with and be bound by this Privacy Policy, our Terms of Service and all Applicable Laws and regulations.

If you have any questions about this Privacy Policy, please email us at privacy@herbintel.ca.

This Privacy Policy constitutes a legally binding agreement between you and 14319745 Canada Inc. o/a Herb Intelligence (“**Herb Intelligence**”, the “**Company**”, “**we**”, “**us**”, or “**our**”) governing your access to, and use of the Platform and our collection and use of your Personal Information in connection with such use and access.

This Privacy Policy includes and hereby incorporates by reference the following important documents, as they may be in effect and modified from time to time: our Terms of Use, and the Engagement Agreement. Collectively, this Privacy Policy, our Terms of Use and Engagement Agreement, are referred to as the “**Terms of Service**”.

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU MUST NOT ACCESS OR USE THE PLATFORM.

We reserve the right in our sole discretion to revise and update this Privacy Policy from time to time. Any and all such modifications are effective immediately upon posting and apply to all access, and continued use of, the Platform. You agree to periodically review this Privacy Policy to be aware of any such modifications. Your continued use of the Platform shall constitute your acceptance of the then-current Privacy Policy.

YOU UNDERSTAND THAT BY USING THE PLATFORM AFTER THE EFFECTIVE DATE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY.

IF YOU USE THE PLATFORM ON BEHALF OF AN ORGANIZATION OR NATUROPATHIC MEDICINE PROVIDER YOU AGREE TO THIS PRIVACY POLICY ON BEHALF OF SUCH ORGANIZATION OR NATUROPATHIC MEDICINE PROVIDER AND IN DOING SO YOU REPRESENT AND WARRANT THAT YOU HAVE THE AUTHORITY TO BIND THAT ORGANIZATION OR NATUROPATHIC MEDICINE PROVIDER TO THIS PRIVACY POLICY AND AGREE THAT YOU ARE BINDING BOTH YOURSELF AND THAT ORGANIZATION OR NATUROPATHIC MEDICINE PROVIDER TO THIS PRIVACY POLICY.

Definitions

In this Privacy Policy, “**Personal Information**” means any of your data relating to an identified or identifiable natural person, and “**you**” and “**your**” refer to a User. Any capitalized terms used in this Privacy Policy that are not defined here will have the meanings given to them in our Terms of Use.

Overview

This Privacy Policy covers our treatment of any Personal Information we collect about you and describes our practices regarding the collection, use and disclosure of Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information.

Certain parts of our Platform and uses of your Personal Information are subject to more privacy and data security provisions in our Terms of Use and Retainer Agreement. This Privacy Policy should be read along with our Terms of Use and Retainer Agreement. You must review those documents.

This Privacy Policy does not apply to third-party services, websites, or applications we may link to through the Platform, including the Payments Data Controller. When you use one of these links to leave our Platform, we encourage you to review the privacy policies and terms of use that apply to the services, websites, or applications you access.

Personal Information we Collect

Personal Information that is Necessary to use the Platform

The categories of Personal Information described below are necessary to help with your legal use of the Platform and for Herb Intelligence to meet our obligations under Applicable Laws.

- **Account Information.** When you sign up for an Account, we require certain Personal Information such as your first name, last name, telephone number, email address, physical address, and date of birth. If you are accessing the Platform on behalf of an organization, we may require more information about the organization such as entity name, entity type and size, nature of business/operations, and answers to qualitative questions about your organization. For Naturopathic Doctors, we require certain additional information, including your work history, information about your NATUROPATHIC MEDICINE PROVIDER and information about your qualification, competence, practice status and legal standing to deliver Naturopathic Medicine Services.
- **Identity Verification Information.** To follow Applicable Laws and to create and maintain a trusted environment, we may also collect identity verification information (such as images of your government issued ID, passport, national ID card, or driver's license) or other authentication information.
- **Payment Transaction Information.** We use the services of the Payments Data Controller to process, route and deliver funds under Applicable Laws to supply the Payment Services. All Users agree that the Payment Services, including the charging, processing and delivery of any Aggregate Fees are ultimately subject to the policies of our Payments Data Controller. The Payments Data Controller's Privacy Policy and other legal information is located here once updated.

Information you Voluntarily Provide to Herb Intelligence

Herb Intelligence collects the information you choose to provide to us through your use of the Platform, including as described below.

- **Communications with Herb Intelligence** . When you communicate directly with Herb Intelligence , including by communicating with Herb Intelligence representative, we may collect information from such communications, including any information you choose to provide us.
- **Additional Profile Information.** As a Naturopathic Doctor, you may provide more information as part of your Naturopathic Doctor Account (such as gender, practice areas, years of experience, preferred language(s), city, a personal description/biography, etc.). As shown in your Naturopathic Doctor Account settings, some of this information will be publicly visible to Users.
- **Other Information.** You may otherwise provide us information when you submit User Content, fill in a form, update or add information to your Account, respond to surveys, post to community forums, participate in promotions, communicate with our Herb Intelligence representative, share your experience with us, or use other features of the Herb Intelligence Platform.

Information Generated from Your use of the Platform

Like most web sites, we use technologies, such as cookies and web beacons, to collect information about the pages you view, the links you click and other actions you take in using the Platform.

When we send emails through our email distributor, such as newsletter emails or certain marketing emails, we are automatically able to monitor certain activities such as how many emails were viewed, by whom, and which links you clicked on. This helps us improve our content and ensure we are sending you stuff you'll want to read. We do not share this information with anyone else.

Herb Intelligence may automatically collect information relating to your access and usage of the Platform, as further described below.

- **Usage Information.** Herb Intelligence collects information about your interactions with the Platform, such as the links, pages, or Herb Intelligence Content you select and view, as well as how long you spend on a particular page or Content; your searches; the Naturopathic Doctor Contract you create and enter into; and other actions on the Platform. Other information we collect may include your device type, operating system, browser type, IP address, MAC address, the websites or application from which you navigated to our Platform, and similar information.
- **General Health Information.** Herb Intelligence collects general information about your health, such as your symptoms, herbal medication and previous treatments to provide Herb Intelligence Content.
- **Geo-location Information.** Herb Intelligence may collect information about your precise or approximate location as determined through data such as your IP address or your mobile device's GPS. Most mobile devices let you control or disable the use of location services for applications in the device's settings menu. Herb Intelligence may also collect this information

even when you are not using the Platform if this connection is enabled through your settings or device permissions.

- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the Platform, even if you have not created an Account. That information includes, among other things: details about how you've used the Platform (including if you clicked on links to third-party applications), your IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using the Herb Intelligence Platform.
- **Cookies, Pixels and Similar Technologies.** We use cookies and similar technologies when you use the Platform or engage with our online advertising or email communications. "Cookies" are small files saved onto your device or browser through your web browser that allow us to collect certain usage information, and "pixel tags" are tiny graphics with unique identifiers embedded on the Platform that allow us to collect certain usage information. We may collect certain information by automated means using technologies such as cookies, web beacons, pixels, browser analysis tools, server logs, and mobile identifiers. Often, the information we collect using cookies and other tools is only used in a non-identifiable format without reference to Personal Information. For example, we may use information we collect to better understand website traffic patterns and to optimize our Website experience. Sometimes, we associate the information we collect using cookies and other technology with your Personal Information. Our business partners may also use these tracking technologies on the Herb Intelligence Platform or engage others to track your behavior on our behalf.
- **Third-party Cookies, Pixels and SDKs.** Third-parties may use cookies, web beacons, and other storage technologies to collect or receive information from our Platform and elsewhere on the internet and use that information to provide measurement services and targeted advertising. Similarly, such third-parties may collect or receive information from your Account and other applications and use that information to provide targeted advertising. Users can opt out of the collection and use of their Personal Information for advertising targeting by updating their browser privacy and advertising settings and by contacting us with a description of your request and validation information.
- **Do Not Track Signals.** While you may disable the usage of cookies through your browser settings, the Platform does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application due to lack of standardization regarding how that signal should be interpreted.

Information Received from Third Parties

Herb Intelligence may receive Personal Information about you from third-parties and combine that information with information we collect from your use of the Platform. We are not responsible for how such third-parties collect, control, manage, process, disclose or share your Personal Information, and any request or query regarding any such management or disclosure of your Personal Information should be directed to such third-parties.

Personal Information received from third-parties may include, but is not limited to:

- **Third-party Services.** If you create, connect, or login to your Account with a third-party service (Google, Facebook, etc.), the third-party service provider may send us information such as your

registration, friends list, and profile information from that service. This information varies and is controlled by that service provider or as allowed by you via your privacy settings with that service provider.

- **Background Information (Naturopathic Doctors).** To the extent permitted by Applicable Laws, we may obtain reports on Naturopathic Doctors from public records of criminal convictions or sex offender registrations, or any other local version of police, background, or registered sex offender checks, or any publicly recorded disciplinary actions made by a provincial law society or other regulatory body for Naturopathic Doctors. We may use your information, including your full name and date of birth, to obtain such reports.
- **Referrals.** Referring persons may submit Personal Information about you such as your email address or other contact information.
- **Other Sources.** To the extent permitted by Applicable Law, we may receive more information about you, such as demographic data or information to help detect fraud and safety issues, from third-party service providers or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from service providers like identity verification services for our fraud prevention and risk mitigation. We may receive information about you and your activities on and off the Platform through partnerships, or about your experiences and interactions from our partner networks.

How we use Information we Collect

Herb Intelligence collects, uses, stores, discloses and processes your Personal Information: (i) to create, improve, develop and customize the Platform; (ii) to create your Account; (iii) as disclosed to you when you provide us with such Personal Information; (iv) to respond to User inquiries; (v) to help with the Payment Services, including as required by the Payments Data Controller; (vi) to help with connections between Clients and Naturopathic Doctors for the delivery of Naturopathic Medicine Services under a Naturopathic Doctor Contract; (vii) to enforce our Terms of Service; (viii) to comply with Applicable Laws; (ix) for security and maintenance purposes; (x) for internal business analytics, such as understanding the demographics and preferences of our Users; (xi) to send you Notices; (xii) for advertising and marketing analysis and operations; (xiii) to create Aggregate Data as permitted by our Terms of Use; and (xiv) for any other uses that may be determined under Applicable Laws.

For context and illustrative purposes only, Herb Intelligence collects, uses, stores, reveals and processes your Personal Information to:

- create, improve, develop, and customize the Platform;
- enable you to create an Account and to access and use the Platform;
- enable you to communicate with other Users;
- improve and optimize the User experience;
- provide customer service;
- take such actions as revealed to you when you provide us with your Personal Information;
- respond to User inquiries;
- send you Notices or support messages, updates, security alerts, and account notifications;
- help with the Payment Services, including as required by the Payments Data Controller;
- resolve any disputes;
- enforce our Terms of Service;

- comply with Applicable Laws;
- detect and prevent fraud, spam, abuse, security incidents, and other harmful activity;
- conduct security investigations and risk assessments;
- verify or authenticate information;
- conduct checks against databases and other information sources, including background or police checks;
- restrict or suspend User access to the Platform if we detect activity we think poses a safety or other risk to the Platform, our Users, or third-parties;
- enable internal business analytics;
- support advertising and marketing analysis and operations;
- send you Notices, promotional messages, marketing, advertising, and other information that may interest you;
- administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Herb Intelligence or its third-party partners;
- invite you to events and relevant opportunities; and
- create Aggregate Data.

Payments Information and Services

Herb Intelligence, as a service, intends to facilitate a payment infrastructure which enables Clients to pay any Aggregate Fees payable under a Naturopathic Doctor Contract and for Naturopathic Doctors to collect payment of any Service Fees and disbursements, plus applicable taxes, owing to them under a Naturopathic Doctor Contract (“**Payment Services**”).

We will use the services of a payment processor (“**Payments Data Controller**”) to process, route and deliver funds under Applicable Laws to supply the Payment Services.

You agree that we may use the Payments Data Controller and certain third-party vendors and service providers to process payments and manage your Payment Method and other Personal Information, as required by the Payments Data Controller.

Other than as is necessary to create an Account, we do not collect or store any Personal Information related to the Payments Services. All Personal Information required to help with the Payment Services is collected, stored, and managed by the Payments Data Controller, which has its own worldwide global Privacy Policy. To access the information about the policies of the Payments Data Controller, please check this policy from time to time to see an updated link.

Sharing and Disclosure

Where permissible under Applicable Laws we may use certain limited Personal Information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our Platform or otherwise promote the Platform. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may appeal to you.

The social media platforms with which we share your Personal Information are not controlled or supervised by Herb Intelligence. Questions about how your social media platform service provider processes your Personal Information should be directed to this provider.

Sharing between Naturopathic Doctors and Clients

To help with interactions between Naturopathic Doctors and Clients, we may share certain information, including Personal Information, between Clients and Naturopathic Doctors through Platform. For example:

- when a Client seeks Naturopathic Medicine Services or enters into a Naturopathic Doctor Contract certain information about such Client is shared with the Naturopathic Doctor, including the Client's name and contact information, information about the Client's herbal medicine needs and certain other information such Client provides;
- when a Naturopathic Doctor accepts a Naturopathic Doctor Contract, certain information about such Naturopathic Doctor is shared with the Client, including the Naturopathic Doctor's name and contact information, areas of medical knowledge and certain other information such Naturopathic Doctor provides.

Profiles, Listings, and other Public Information of Naturopathic Doctors

The Platform enables Naturopathic Doctors to publish information, including Personal Information, that is visible to Users. For example:

- parts of each Naturopathic Doctor's public profile page, such as your first and last name, profile photo, your Naturopathic Medicine Provider or medical practice, work history, biography/description, city, practice areas, experience, rating, and reviews, are visible to Users (a "**Profile**"). Your calendar availability and other information is shared where you have opted to share for Client booking purposes;
- Client generated Ratings and Reviews are visible to Users; and
- if you submit User Content in a community or discussion forum, blog, or social media post, or use a similar feature on the Platform, that content is visible to Users.

Information shared publicly on the Platform may be indexed through third-party search engines. Sometimes, you may opt out of this feature in your Account settings. If you change your settings or your public-facing content, these search engines may not update their databases. We do not control the practices of third-party search engines, and they may use caches containing your outdated information.

Third-party Services used by Naturopathic Doctors

Naturopathic Doctors may use third-party services to help, supplement or support their use of the Platform, such as calendar providers, accounting software, medical practice support tools or medical practice management software. Naturopathic Doctors may share information about a Client (like organization name, file number, account number, general nature of matter) with such third-party service providers to deliver Naturopathic Medicine Services under a Naturopathic

Doctor Contract. Naturopathic Doctors are responsible for ensuring the third-party service providers they use process and maintain Client information securely and in compliance with Applicable Laws and to preserve solicitor-client privilege.

Compliance, Legal Requests, Preventing Harm and Protection of our Rights.

Herb Intelligence, either directly or through its Payments Data Controller, may in certain circumstances disclose your information, including Personal Information, to courts, law enforcement, governmental authorities, tax authorities, or authorized third-parties. These circumstances include: where and to the extent we must do so by Applicable Law or if disclosure is reasonably necessary in order to: (i) meet our legal obligations; (ii) comply with legal process; (iii) respond to claims asserted against Herb Intelligence; (iv) respond to requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our Users to legal liability; (v) enforce and administer our Terms of Service, payment terms, or other agreements with Naturopathic Doctors, Clients or other Users; (vi) protect the rights, property or personal safety of Herb Intelligence, its employees, Naturopathic Doctors, Clients, or members of the public; or (vii) cooperate with Naturopathic Medicine Services or Naturopathic Doctor regulators in the investigation of any criminal, civil, or administrative matter.

Where considered appropriate in our sole discretion, Herb Intelligence may tell Naturopathic Doctors or Clients about legal requests for the disclosure of Personal Information unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by Applicable Law; or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon our property, our Users and our Platform.

Herb Intelligence 's Service Providers

Herb Intelligence may use a variety of third-party service providers to help us provide and to enable Users to access and use the Platform. Service providers may be located inside or outside of Canada, the United States, or the European Economic Area.

Herb Intelligence may use third-party service providers to help us: (i) verify your identity or authenticate your identification documents; (ii) check information against public databases; (iii) conduct background or police checks, fraud prevention, and risk assessment; (iv) perform product development, maintenance and debugging; (v) market or offer Naturopathic Medicine Services through third-party platforms and software tools (e.g., through the integration with our APIs); (vi) provide customer service, advertising, or Payment Services; or (vii) process, handle or assess insurance claims or similar claims.

You agree that Herb Intelligence may use third-party service providers to help with any of the foregoing functionalities and, in doing so, share your Personal Information with such third-party service providers to the limited extent for such service providers to complete their function or perform their service. All Personal Information collected, stored, and managed by any third-party service providers will be subject to the privacy policies of each such third-party service provider.

Your Choices and Rights

Limiting Information Collected and Opting-out

You have choices regarding your Personal Information:

- you can choose not to use the Platform;
- you can limit the information you provide to Herb Intelligence;
- you can choose not to participate in Herb Intelligence promotions;
- you can limit the communications that Herb Intelligence sends to you; and
- you can opt out of marketing emails by clicking the link labeled “unsubscribe” at the bottom of any marketing email we send you or by changing the notification settings in your Account.

You may exercise the rights described in this section by emailing privacy@herbintel.ca.

Managing your Information

You are responsible for keeping your Personal Information up to date. You can access and update some of your Personal Information through your Account settings. You may ask us to correct inaccurate or incomplete Personal Information about you (and which you cannot update yourself within the Account).

Data Access and Portability

In some jurisdictions, you may be entitled under Applicable Laws to request copies of your Personal Information held by us. You may also have a right to request copies of Personal Information you have provided to us in a structured, common, and machine-readable format or request us to send this information to another service provider (where technically feasible).

Data Retention and Erasure

We generally retain your Personal Information for as long as is necessary to follow our data retention obligations under Applicable Laws. Herb Intelligence may also retain your User Data when your User Data has been archived in Herb Intelligence’s backup systems, in which case we will protect such User Data using its standard data security practices and will eventually delete your User Data in compliance with our retention and deletion policies.

In certain jurisdictions, you can request to have all your Personal Information deleted sooner. If you ask for the erasure of your Personal Information:

- we may keep some of your Personal Information for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend an Account for fraud or safety reasons, we may keep certain information from that Account to prevent a User from opening a new Account again;

- we may keep and use your Personal Information as needed to comply with our data retention obligations under Applicable Laws. For example, Herb Intelligence and our Payments Data Controller may keep certain records as required for tax, legal reporting, and auditing purposes;
- User Content shared by you may still be publicly visible on the Platform, even after this request; and
- residual copies of your Personal Information may not be removed from our backup systems for a limited time span.

Withdrawing Consent and Restriction of Processing

If we are processing your Personal Information based on your consent, you may withdraw your consent at any time by changing your Account settings or by sending a communication to Herb Intelligence specifying which consent you are withdrawing. The withdrawal of your consent does not affect the lawfulness of any processing activities based on this consent before its withdrawal. Additionally, in some jurisdictions, Applicable Law may give you the right to limit how we use your Personal Information, in particular where: (i) you contest the accuracy of your Personal Information; (ii) the processing is unlawful and you oppose the erasure of your Personal Information; (iii) we no longer need your Personal Information for processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing of your Personal Information under a legitimate interest (as explained below).

Objection to Processing

In some jurisdictions, Applicable Law may entitle you to require Herb Intelligence not to process your Personal Information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing, Herb Intelligence will no longer process your Personal Information for these purposes unless we can show compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims.

Where your Personal Information is processed for direct marketing purposes, you may, ask Herb Intelligence to stop processing your Personal Information for these direct marketing purposes by emailing privacy@herbintel.ca.

Lodging Complaints

You may lodge complaints about our data processing activities by emailing privacy@herbintel.ca.

Security

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your Personal Information against unauthorized access, loss, destruction, or alteration. Some safeguards we use to protect your Personal Information are

firewalls and data encryption, and information access controls. If you know or have reason to believe that your Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Account, please contact us by emailing privacy@herbintel.ca.

Changes to this Privacy Policy

Herb Intelligence reserves the right to change this Privacy Policy at any time under this provision. If we change this Privacy Policy, we will post the revised Privacy Policy on the Herb Intelligence Platform and update the “Last Updated” date at the top of this Privacy Policy. If you disagree with the terms of this Privacy Policy, you must cancel your Account. Your continued access to, or use of, the Herb Intelligence Platform will be subject to this and any revised Privacy Policy.

Severability

If any term, provision, covenant, or condition of this Privacy Policy is held invalid or unenforceable for any reason, the other provisions will continue in full force and effect as if this Privacy Policy had been produced with the invalid part of it eliminated.

No Naturopathic Doctor-Client Relationship

HERB INTELLIGENCE IS NOT A NATUROPATHIC MEDICINE PROVIDER, DOES NOT EMPLOY NATUROPATHIC DOCTORS AND DOES NOT ENGAGE IN THE PRACTICE OF NATUROPATHIC MEDICINE OR THE PROVISION OF NATUROPATHIC MEDICINE SERVICES TO CLIENTS. HERB INTELLIGENCE DOES NOT GUARANTEE OR REVIEW THE QUALITY, SUITABILITY, SUFFICIENCY OR OUTCOME OF ANY NATUROPATHIC MEDICINE SERVICES BOOKED, CREATED OR DELIVERED USING THE PLATFORM SERVICES. YOU ARE AWARE THAT NATUROPATHIC MEDICINE SERVICES ARE SUBJECT TO INHERENT RISKS AND OTHER FACTORS BEYOND HERB INTELLIGENCE’S CONTROL. YOU ACKNOWLEDGE THAT HERB INTELLIGENCE DOES NOT PROVIDE MEDICAL ADVICE, OPINIONS OR RECOMMENDATIONS ABOUT THE MEDICAL NEEDS, REMEDIES, HEALTH STRATEGIES APPLICABLE TO CLIENTS, OR PROVIDE ANY MEDICAL ADVICE THE FACTS OF ANY CLIENTS’ PARTICULAR SITUATION.

AS HERB INTELLIGENCE DOES NOT ENGAGE IN THE PRACTICE OF NATUROPATHIC MEDICINE OR THE PROVISION OF NATUROPATHIC MEDICINE SERVICES, HERB INTELLIGENCE DOES NOT, AT ANY TIME, CREATE OR ESTABLISH A NATUROPATHIC DOCTOR-CLIENT RELATIONSHIP WITH ANY CLIENT NOR DOES HERB INTELLIGENCE OWE ANY CLIENT A SPECIAL DUTY OF CARE AS OTHERWISE REQUIRED BY SUCH A NATUROPATHIC DOCTOR-CLIENT RELATIONSHIP.

Contact Us

If you have questions or complaints about this Privacy Policy or our Personal Information handling practices, you may email us at privacy@herbintel.ca.