

# Privacy Policy

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14868871 Canada Inc., d.b.a. Panoramix Coaching (“Panoramix”)

Panoramix Coaching (“**Panoramix**”) takes you privacy very seriously and is committed to protecting it by complying with this Privacy Policy (the “**Policy**”).

Panoramix has made sure to inform its employees, subcontractors, and agents that they must comply with this Policy if they have access to Personal Information while performing their duties.

## Personal Information

The term “**Personal Information**” refers to information that can be used to, directly or indirectly, identify an individual. This excludes business contact information, except where privacy laws deem such information to be Personal Information.

Anonymized data is not Personal Information.

## Scope and Application

This Policy applies to Panoramix’s customers, as well as any end user who uses or accesses the Platform (collectively, the “**Client**”). It also applies to Client’s Personal Information that has been entrusted to Panoramix for the purpose of providing contracted services, including Client’s Personal Information in the possession of Panoramix’s service providers.

## Policy’s Content

- How Panoramix collects, uses, discloses, destroys, and protects its Clients’ Personal Information.
- The types of information Panoramix may collect when a Client visits its Website available at panoramix.app or uses the Panoramix Coaching App available at coaching.panoramix.app (the “**Platform**”).
- Panoramix’s practices regarding Personal Information collection, use, protection, conservation, and disclosure.

## Privacy Practices

To ensure the protection of the Personal Information it possesses, Panoramix has established and implemented policies and practices governing the management of its Personal Information.

These internal policies and procedures govern the collection, use, communication, conservation, and destruction of Personal Information, as well as the handling of complaints, information security and data governance. These policies and practices also provide a framework for the operationalization of privacy impact assessments, as well as for the prevention of and response to potential privacy incidents.

## **Privacy Officer**

Panoramix has appointed a Privacy Officer who is responsible for ensuring that Panoramix complies with its internal protection of Personal Information practices. The Privacy Officer provides support in the event of any questions, complaints or requests relating to the protection of Personal Information.

To contact the Privacy Officer, consult the "Contact us" section below.

## **Collection**

Panoramix may collect Personal Information when a Client accesses and uses the Platform. Personal Information collected may include, but is not limited to: name, postal address, e-mail address, gender, age, telephone number, IP address, and individual profiles (skills, personality, motivators, needs, goals, expectations, etc.).

Personal Information is collected in the following ways:

- Direct interactions with Client, when the latter provides Panoramix with the information (for example, by filling in the fields available on the Platform).
- Automated technologies when accessing the Platform, through the use of cookies and similar technologies.

Since Panoramix has no direct relationship with the individuals coached, nor with the end-users when they differ from the person having contracted with Panoramix, it requires that its Clients ensure that they have obtained all mandatory consents before providing Personal Information to Panoramix.

## **Use**

Panoramix collects and uses Personal Information for the following purposes:

- Establishing and maintaining a commercial relationship with its Customers.
- Developing, improving, promoting, or providing products and services to its Clients, including the diagnosis of technical problems or the improvement of the functionalities and security of the Platform.
- Anonymizing Personal Information.
- Meeting contractual or legal obligations.
- Investigating and resolving incidents.
- Any other purpose permitted by law, including responding to law enforcement or governmental requests.

## **Communication and Transfers**

Panoramix will not intentionally grant any third-party access to Personal Information, except to the extent that such disclosure is permitted or required by law.

Panoramix may, from time to time, communicate certain Personal Information to subcontractors or agents in order to provide services and make available all functionalities

offered on the Platform (for example, support services, maintenance, development, legal representation, etc.). These third parties will only have access to Personal Information that is necessary to perform their tasks and are required not to disclose or use it for any other purpose.

Please note that these subcontractors or agents may be located in Canada or in other jurisdictions. Please be aware that Panoramix has contractual agreements with these subcontractors to ensure the security of the data entrusted to them and that Panoramix performs Privacy Impact Assessments before disclosing any Personal Information outside the province of Quebec. Although Personal Information transmitted is protected by appropriate security measures, Personal Information may be made available to foreign government agencies, pursuant to applicable laws.

### **Retention**

Panoramix has established retention periods for Personal Information under its control. Panoramix will not retain Personal Information longer than is necessary or relevant for the identified purposes, unless otherwise required by law or regulation. Once these periods have expired, Panoramix will destroy the Personal Information in accordance with its internal Personal Information management policies.

Any individual may request that his or her Personal Information be rectified or deleted by contacting the Privacy Officer.

### **Security**

Panoramix makes the security of the Personal Information it collects, uses, and controls a priority. Accordingly, Panoramix ensures that security measures appropriate to the sensitivity of the data are in place to protect Personal Information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification, or destruction.

To the extent possible and applicable, Panoramix implements, maintains, and monitors technical and administrative measures to help protect the security, integrity, availability, and confidentiality of the Personal Information it collects or over which it has control.

Panoramix's Personal Information management program includes incident detection and response practices and procedures designed to facilitate the prompt reporting of incidents involving Personal Information.

### **Cookies**

Panoramix uses different types of cookies:

1. Connection, performance, and functionality cookies: These cookies help to personalize and improve the user experience. For example, they may remember your preferences so you don't have to re-enter information more than once, or they may remember your login information, so you don't have to re-enter it each time you use the Platform. They allow Panoramix to understand your behavior in order to improve our services and the Platform.
2. Security cookies: These cookies help protect your accounts from unauthorized users. They help maintain session integrity and provide increased security by blocking unauthorized attempts to access your account.

Panoramix uses 2 main types of cookies:

1. **Session cookie:** This cookie is stored for the duration of your visit on the Platform, after which it is deleted from your device. It identifies you and is deleted when you leave the Platform.
2. **Persistent cookies:** This cookie is stored on your device until it expires and will be retrieved on your next visit.

Please note that the use of cookies only identifies you as a user and does not otherwise recognize you.

### Disabling Cookies

You can prevent the Platform's personalization features by disabling cookies on your browser. You can do this by changing the settings on your browser or mobile device.

However, if you decide to refuse cookies, some pages or sections of the Platform may not display correctly or some features may not be available.

### **Policy Changes and Updates**

Panoramix may, at its discretion, update, revise, modify or supplement this Policy from time to time. If a material change is made to the Policy, Panoramix will send you a link to the new version of the Policy and a notice will be posted on the Policy's publication page. Panoramix asks its users to review the revised Policy before continuing to use its services.

Continued use of the services provided by Panoramix after the revised Policy becomes effective constitutes consent to the revised Policy.

### **Contact Us**

Our Privacy Officer is available to respond to any questions, requests or complaints regarding Panoramix's privacy practices. Here is his contact information:

Privacy Officer  
14868871 Canada Inc. d.b.a. Panoramix  
1596, Philippe-Pointon Street  
Québec City (Québec)  
G1Y 3J8

By email: [privacy@panoramix.app](mailto:privacy@panoramix.app)

Panoramix is committed to responding promptly and accurately to all your questions and concerns about the privacy and security of Personal Information, as well as our privacy policies and practices.