

OLA Privacy Policy – Key Points

Sayge Inc. (“Company”, “We”, “Us” and similar terms) understands that your time is valuable. Therefore, we have set out below some important highlights of our OLA Privacy Policy (the “Policy”). You can obtain more information about how we collect, use, disclose and protect your personal information by reviewing our full Policy. **We encourage you to read our full Policy, as it contains important information for you.**

What personal information do we collect?

- We collect information that you provide to us directly, when you download or register for the Ola App (the “App”) or complete a health questionnaire.
- When you scan a QR code at an Establishment.
- We also collect certain device and usage information via cookies and other technologies, in order for the App to function.

Why do we collect personal information and how is it used?

- We use the information that we collect for the purpose of providing our services to your Employer, Institutions and other Proprietors, including to assist them to confirm that you or, if applicable, minors under your supervision, meet the entrance criteria for their Establishments and help them meet their legal obligations.
- We also use the information that we collect to ensure the App functions as it should, and to evaluate and improve the App.

Is personal information shared or disclosed?

- If you scan your QR code at your Employer’s Establishment or in connection with your employment, we will disclose to your Employer your name, your full answers to the Health Questionnaire for the applicable day, and the date and time of your entry or attempted entry to the Employer’s Establishment. **Your Employer will use such information for its own purposes, and may further disclose such information, in accordance with its own policies, procedures and practices.**
- If you scan your QR code at a Proprietor’s Establishment, we will disclose to the Proprietor your name and whether you passed or failed the Health Questionnaire on the relevant day, as well as the date and time of your entry or attempted entry into the Proprietor’s Establishment. **The Proprietor will use such information for its own purposes, and may further disclose such information, in accordance with its own policies, procedures and practices.**

- If you scan your QR code at an Institution's Establishment, we will disclose to the Institution your name and the name of the minor under your supervision and whether they passed or failed the Health Questionnaire on the relevant day, as well as the date and time of the minor's entry or attempted entry into the Institution's Establishment. The Institution will use such information for its own purposes, and may further disclose such information, in accordance with its own policies, procedures and practices.
- We also share information with our service providers and affiliates, who may use it for the same purposes that we use such information.
- We may also disclose information in the event of a business transaction, or as required or permitted to comply with any legal requirement, court order or regulatory demand/request (including to public health authorities). We also reserve the right to voluntarily provide information to public health authorities in a de-identified and aggregated form.
- We may also disclose your personal information where permitted by applicable law, if We believe disclosure is necessary or appropriate to protect the rights, property, health or safety of the Company, our affiliates and subsidiaries, our clients, or others.

What are the risks / consequences?

- The information that you provide via the App may be used by an Employer, an Institution or Proprietor to make certain decisions about you or, if applicable, a minor under your supervision. For example, you or a minor under your supervision may be denied entry to an Establishment, which could result in loss of income or other consequences. In addition, an Employer, an Institution or Proprietor may use information that you provide via the App in connection with disciplinary actions or legal proceedings, including if you provide false or misleading information. Your Employer, an Institution or a Proprietor may also retain, use or disclose the personal information for a purpose other than those described in this Policy.
- Although we take steps to safeguard the personal information under our control, "perfect security" does not exist online. It is possible that third parties may unlawfully intercept or access such information.

What else should you know?

- Personal information collected via the App will be stored in Canada and the US, and therefore, may be accessible to courts, law enforcement, and national security authorities in either or both of these countries.
- Your personal information or, if applicable, the personal information of a minor under your supervision, will be accessible to the following categories of

individuals within our organization: the Customer Success Team; the Database Management Team; the IT Operations Team; the Quality Assurance Team; the Account Management Team; and the Product Development Team.

- You have the right to access and rectify your or, if applicable, a minor under your supervision's personal information, subject to certain permitted and required exceptions under applicable law.
- You can contact us with questions, including questions about our collection of your or, if applicable, a minor under your supervision's personal information, and if you are located in Canada questions regarding collection, use, disclosure or storage of personal information by our service providers and affiliates outside Canada (or to obtain written information about our policies and practices with respect to such service providers and affiliates).

Ola Privacy Policy

Last modified: November 24, 2020

Introduction

Sayge Inc. (“**Company**”, “**We**”, “**Us**” and similar terms) respects your privacy and takes steps to protect it through our compliance with this Ola Privacy Policy (the “**Policy**”).

This Policy describes:

- The types of personal information collected, accessed, used, or otherwise processed by the Ola App (the “**App**”);
- Our practices for collecting, using, maintaining, protecting, and disclosing that personal information; and
- How information is shared, including (without limitation) with your employer (“**Employer**”), an institution (“**Institution**”) or a proprietor (“**Proprietor**”) in connection with your or a minor under your supervision’s potential attendance at property or premises you or such minor may visit (collectively “**Establishments**”).

This Policy applies only to information about identifiable individuals (“**personal information**”), which We collect in this App and other electronic communications sent through or in connection with this App.

This Policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App.
- You provide to, or is collected by, any third-party (including your Employer or a Proprietor).
- Information that is not about an identifiable individual, where there is no serious possibility that an individual could be identified through the use of that information, alone or in combination with other information.

Our websites, our other apps, and other third-parties may have their own privacy policies, which We encourage you to read before providing information on or through them.

Please read this Policy carefully to understand our policies and practices regarding personal information and how We will handle it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this Policy. This Policy may change from time to time (see *Changes to our Privacy Policy*). Your continued use of this App after We revise this Policy means you accept those changes, so please check the Policy periodically for updates.

Users Under the Age of 18

The App is not intended for use by individuals under 18 years of age, and We do not knowingly collect personal information from individuals under 18 without parental consent. If We learn we have collected or received personal information from a user under 18 without verification of parental consent, We will delete that information.

Information We Collect and How We Collect It

We collect information from and about users of our App, on behalf of your Employer, an Institution or a Proprietor, as follows:

- We collect information about you or if applicable, a minor under your supervision, directly from you, when you provide it to Us by downloading and registering to use the App;
- We collect information about you or if applicable, a minor under your supervision, directly from you, when you provide it to Us by answering the Health Questionnaire (as defined below);
- We collect information when you scan a QR code in connection with entering an Establishment; and
- Certain information is collected automatically when you use the App.

Information You Provide to Us

Registration Information

When you download, register with, or use this App, We may ask you to provide certain information, including your name, email address, phone number, employer name, and office address, and if applicable, the name of any minors under your supervision and the Institution(s) they attend.

Health Questionnaire Information

Each day that you or a minor under your supervision wishes to enter a participating Establishment, the App will ask you questions that will assist in determining if you or the minor under your supervision are presenting risk factors that may prohibit you and/or the minor from entering that Establishment ("**Health Questionnaire**"). These questions will relate to risk factors associated with contagious illnesses. Accordingly, some personal health information will be collected via the App.

Scanning of QR Code

When you wish to enter an Establishment, your Employer, an Institution or the Proprietor (as applicable) will make arrangements to send you a QR code via a mobile app or email along with certain information so that you can confirm compliance with

the Employer, Institution's or Proprietor's conditions of entry. When you arrive at the Establishment and scan the QR code, the App recognizes that QR code as valid (if the conditions of entry have been confirmed), approves your entry to the Establishment, connects the QR code to your name as entered by your Employer, Institution or the Proprietor (as applicable) through our web portal, and sends your Employer, Institution or the Proprietor (as applicable) an email that you, or a minor under your supervision has arrived. Our system will store a copy of your information (i.e., your name and/or the name of the minor under your supervision and a "pass" or "fail" depending on whether you have met the entrance criteria) as well as a copy of the interaction between your device and the QR code with the App.

Automatic Information Collection and Tracking

When you download, access, and use the App, the App may use technology to automatically collect:

- **Usage Details.** When an individual accesses or uses the App, we may automatically collect certain details, including page views, clicks, communication data and any other resources accessed or used on or through the App.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, and mobile network information.

Information Collection and Tracking Technologies

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.
- **Web Beacons.** Pages of the App may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related app statistics (for example, verifying system and server integrity).

Such technologies are required for the App to function. The App does **not** currently use cookies for purposes other than functionality (e.g., for advertising purposes).

How We Use Personal Information

We use the personal information that We collect, or that is provided to Us, in order to:

- Provide our services to your Employer, an Institution or a Proprietor, as the case may be, including confirming that you or a minor under your supervision meet the criteria to enter any relevant Establishment.
- Assist your Employer, an Institution or a Proprietor, as the case may be, to meet its legal obligations, including with respect to screening employees, customers or visitors for risk factors associated with contagious illnesses, logging visitor information, and complying with any reporting obligations associated with health risks.
- The usage details and device information collected via the App is used to ensure that the App functions as it should, and to evaluate and improve the App.

The personal information that We collect, store or otherwise process, is accessible to the following categories of individuals within our organization: the Customer Success Team; the Database Management Team; the IT Operations Team; the Quality Assurance Team; the Account Management Team; and the Product Development Team.

Disclosure of Your Information

We will disclose your personal information to your Employer, if you are attempting to enter your Employer's Establishment, for the purposes of providing our services. The information that we disclose to your Employer includes your name, the results of your Health Questionnaire(s), and the dates and times of your entry or attempted entry into any Establishment in connection with your employment. Information disclosed to your Employer will be used by your Employer for the purposes of:

- Screening employees for risk factors associated with contagious illnesses.
- Determining whether you are permitted to enter any relevant Establishment(s);
- Logging visit information;
- Contact tracing, if you report any risk factors or are diagnosed with a contagious illness;
- Complying with any reporting obligations associated with health risks;
- Other purposes consistent with your Employer's privacy and data protection policies and practices; and
- Any other purposes disclosed to you by your Employer.

Information that is disclosed to your Employer will be handled in accordance with the privacy and data protection policies, procedures and practices of your Employer. Your Employer may also further disclose your information to third parties at your Employer's discretion. We are not responsible for the actions or omissions of your Employer, including for any use or disclosure of your personal information (or failure to protect

your personal information) by your Employer. If you have any questions regarding how your information will be handled by your Employer, you should contact your Employer directly.

We may disclose your personal information to a Proprietor, if you are attempting to enter the Proprietor's Establishment, for the purposes of providing our services. The information that we disclose to a Proprietor will include your name and whether you passed or failed the Health Questionnaire (but not your specific answers), and may include the dates and times of your entry or attempted entry into the Proprietor's Establishment. Information disclosed to a Proprietor will be used by the Proprietor for the purposes of:

- Screening visitors for risk factors associated with contagious illnesses;
- Determining whether you are permitted to enter any relevant Establishment(s);
- Logging visitor information;
- Contact tracing;
- Complying with any reporting obligations associated with health risks; and
- Other purposes consistent with the Proprietor's privacy and data protection policies and practices.

Information that is disclosed to a Proprietor will be handled in accordance with the privacy and data protection policies, procedures and practices of the Proprietor. The Proprietor may also further disclose your information to third parties at the Proprietor's discretion. We are not responsible for the actions or omissions of a Proprietor, including for any use or disclosure of your personal information (or failure to protect your personal information) by a Proprietor. If you have any questions regarding how your information will be handled by a Proprietor, you should review the relevant Proprietor's privacy policies and/or contact the Proprietor directly.

We will disclose the personal information of a minor under your supervision to an Institution, if such minor is attempting to enter the Institution's Establishment, for the purposes of providing our services. The information that we disclose to an Institution will include your name, the name of the minor under your supervision and whether they passed or failed the Health Questionnaire (but not their specific answers), and may include the dates and times of their entry or attempted entry into the Institution's Establishment. Information disclosed to an Institution will be used by the Institution for the purposes of:

- Screening visitors for risk factors associated with contagious illnesses;
- Determining whether the minor under your supervision is permitted to enter any relevant Establishment(s);
- Logging visitor information;
- Contact tracing;

- Complying with any reporting obligations associated with health risks; and
- Other purposes consistent with the Institution's privacy and data protection policies and practices.

Information that is disclosed to an Institution will be handled in accordance with the privacy and data protection policies, procedures and practices of the Institution. The Institution may also further disclose the information to third parties at the Institution's discretion. We are not responsible for the actions or omissions of an Institution, including for any use or disclosure of the personal information (or failure to protect the personal information) by an Institution. If you have any questions regarding how your information will be handled by an Institution, you should review the relevant Institution's privacy policies and/or contact the Institution directly.

We may also disclose personal information that We collect or that you provide to Us through, or in connection with, the App, as follows:

- To our subsidiaries and affiliates, including Angus Systems Group, Ltd and Angus Systems Group, Inc., for the same purposes that We use the information.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- To government and regulatory bodies and institutions when required by law, including public health authorities. We also reserve the right to voluntarily provide information to public health authorities in a de-identified and aggregated form.
- For any other reasonable purpose disclosed by Us when you provide the information, with your consent (express or implied, as appropriate, in accordance with applicable laws).
- Where otherwise required by applicable law, including to comply with any court order, law, or legal process.
- Where permitted by applicable law, including, without limitation, to the extent permitted if We believe disclosure is necessary or appropriate to protect the rights, property, health or safety of the Company, our affiliates and subsidiaries, our clients, or others.

Some of our affiliates, subsidiaries and service providers may be located outside the country in which you reside. Personal information will be stored in Canada and the US, and therefore, may be accessible to courts, law enforcement, and national security authorities in either or both of these countries.

Risks and Consequences

The information that you provide to Us may be used by an Employer, an Institution or Proprietor to make certain decisions about you. For example, you or a minor under your supervision may be denied entry to an Establishment, which could result in loss of income or other consequences. In addition, an Employer, Institution or Proprietor may use information that you provide via the App in connection with disciplinary actions or legal proceedings, including if you provide false or misleading information. As noted above, your Employer, an Institution or a Proprietor may also use or disclose your personal information for a purpose other than those described in this Policy.

See, also, below under “Data Security” for information regarding transmission of data online.

Retention of Your Information

All information will be kept in Canada and the United States. We will retain your personal information and, if applicable, the information of a minor under your supervision, for as long as necessary for the purposes set out in this policy. We will also retain your personal information or, if applicable, the information of a minor under your supervision, to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and as otherwise required or permitted by applicable law. If you no longer want us to use your or a minor under your supervision’s personal information you may close your account by contacting us to make such a request as set out below (see *Contact Information*), subject to providing satisfactory proof of identity where applicable.

Please note that your Employer, an Institution or a Proprietor may retain and continue to use and disclose any personal information about you, or, if applicable, a minor under your supervision, that was disclosed to such third parties by Us prior to closure of your account. You should contact your Employer and/or the relevant Institution(s) or Proprietor(s) directly to withdraw your consent to their continued use or disclosure of your information.

Accessing and Correcting Your Personal Information

Individuals who wish to access, erase, change, rectify, update or restrict the processing or object to the processing of any personal information, may contact us to make such a request as set out below (see *Contact Information*), subject to providing satisfactory proof of identity where applicable. Such requests will be considered, and handled in accordance with the applicable laws in the relevant jurisdiction.

Your California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We will not use the information obtained from this App for those purposes.

Data Security

We have implemented measures designed to secure personal information from theft, accidental loss, and from unauthorized access, use, alteration, and disclosure. All personal information that you provide to Us, or that We otherwise collect in connection with the App, is encrypted and stored on our secure servers behind firewalls.

The safety and security of the information also depends on you. Where We have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential and secure. We recommend that you choose a secure password, and We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although We take steps to protect the information that is provided to Us, We cannot guarantee the security of information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures We implement.

Changes to Our Privacy Policy

We may update this Policy from time to time. If We make material changes to how We treat the personal information, We will post the new privacy policy on this page with a notice that the Policy has been updated, and We will also notify you of material changes by email at the email address specified in your account.

The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring We have an up-to-date active and deliverable email address for you and for periodically visiting this Policy to check for any changes.

Contact Information

You may contact our General Counsel at Legal@angus-systems.com, 1125 Leslie Street, Toronto, ON M3C 2J6, or 416-385-8550, in order to:

- Ask questions, make a complaint, or otherwise comment about this Policy, our collection, use or disclosure of your personal information, or our privacy and personal information handling practices;

- Access, correct or update your personal information, to the extent you are not able to do this by logging into the App or the web portal and visiting your account profile page;
- Withdraw consent to continued use and disclosure of personal information, subject to any legal restrictions and reasonable notice; and
- If you are located in Canada, obtain written information about our policies and practices with respect to our service providers outside Canada (including affiliates that provide a service to Us), or to ask questions about the collection, use, disclosure or storage of personal information by such service providers and affiliates.