# ALZAI HEALTH CORP. (the "Corporation")

#### PRIVACY POLICY

#### **Privacy Policy Overview**

- 1. Your privacy and trust are important to the Corporation. This Privacy Policy establishes rules to govern the collection, use and disclosure of Personal Information collected by the Corporation in the course of business, in compliance with applicable federal and provincial privacy laws.
- 2. This Privacy Policy applies to all individuals whose Personal Information the Corporation collects, uses, discloses, or otherwise processes in the course of doing business. This includes individuals who are clients and all individuals who are contract workers, contractors, and consultants to the Corporation. It is our policy to only disclose your Personal Information as required or authorized by law or as otherwise set out in this policy.
- 3. We reserve the right to change this policy from time to time as industry practice, the law, and our procedures in this area may change from time to time. We will post the current version of this policy at the company's website.

## Personal Information

- 4. For the purposes of this Privacy Policy, "**Personal Information**" means information about an identifiable individual, but does not include a person's name, title, business address or telephone number, as an employee of an organization.
- 5. This Privacy Policy applies to all Personal Information that is collected, used, disclosed, or otherwise processed by the Corporation. The Corporation has designated a Privacy Officer to be accountable for the operation of this Privacy Policy. Individuals may question or report any privacy concerns, breaches, violations or compliance issues to the Corporation's Privacy Officer at the address indicated below.
- 6. If the policies and procedures outlined in this document do not address a specific situation, individuals are advised to contact the Privacy Officer, Boaz Citrin, for guidance or clarification at boaz@alzaihealth.com.

#### **Collection of Personal Information**

- 7. The Corporation collects and uses only the Personal Information that we need for providing services and operating our business. The Corporation may collect Personal Information, such as the following:
  - (a) first and last name:
  - (b) email address;
  - (c) date of birth; and
  - (d) credit card number.

- 8. The Corporation collects, uses and discloses Personal Information for the following purposes:
  - (a) to process credit applications;
  - (b) to manage the Corporation's business and operations, including customer relationships and matters;
  - (c) to meet legal and regulatory requirements;
  - (d) to inform individuals about the Corporation's products and services that we believe may be of interest to them;
  - (e) to better understand an individual's interests in our products and services;
  - (f) deliver, develop, enhance or improve products and services;
  - (g) evaluate suitability of candidates;
  - (h) provide warranties for products and services;
  - (i) provide information on future opportunities;
  - (j) verify access rights to our website;
  - (k) contact clients about appointments and meetings;
  - (1) meet regulatory requirements;
  - (m) conduct market research;
  - (n) to enforce our legal relationship with you; and
  - (o) as is necessary in contemplation of a business transaction.
- 9. We normally collect information directly from our clients. We may collect your information from other persons with your consent or as authorized by law. Before or at the time of collecting Personal Information, we identify the purposes for which we are collecting the information. We do not provide this notification when Personal Information is volunteered for an obvious purpose. If we wish to use or disclose your information for a new purpose not included in this policy, we will notify you and seek your consent.
- 10. In addition, we also receive and send data from our servers and from your browser when you visit our website, including your IP address, the time and information about the page you requested and the website through which you were linked to our site, if any. We may use tracking technologies in a variety of ways, including the following: keeping count of return visits to our site; accumulating and reporting anonymous, aggregate (data collected in mass), statistical information on website usage; and determining which features users like best.

11. Finally, we and our service providers may use cookies to collect automated information when you visit our website. Cookies store small amounts of data on your computer about your visit to our site, which makes the site more useful to you and easier to visit again. This information may include your username, operating system, IP address and language settings. We use this information to personalize the website or other content in accordance with your interests and preferences (e.g., language preference) and improve your user experience. You do not need to have cookies turned on to visit the Corporation's website. You may also elect not to allow cookies to be collected by selecting certain options on your browser. Please note that disabling cookies on your browser may reduce your ability to take advantage of the features of our website.

#### Consent

- 12. Ordinarily we ask for consent to collect, use or disclose Personal Information, except in specific circumstances where collection, use or disclosure without consent is permitted or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.
- 13. You may withdraw consent to the use and disclosure of Personal Information at any time, unless the Personal Information is necessary for us to fulfil our reasonable business or legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary Personal Information.
- 14. The purpose for collecting Personal Information is set out in this policy. Any necessary consents shall be obtained before Personal Information is collected, used or disclosed.
- 15. We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain Personal Information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), in writing (by signing a consent form), or electronically (by clicking a button).
- 16. In cases that do not involve sensitive Personal Information, we may rely on "opt-out" consent.
- 17. The amount and type of Personal Information collected by the Corporation shall be limited to what is necessary to fulfill the identified purpose. Personal Information shall only be used or disclosed for the purposes for which it is collected. Exceptions may be made with the consent of the individual or if authorized or required by law.
- 18. Personal Information collected by the Corporation or on behalf of the Corporation will be sent to the Corporation's head office in Ottawa, Ontario and will be subject to the laws of Canada.

## **Obtaining Access to Personal Information**

- 19. Upon request received by the Corporation in writing, individuals shall be informed of the existence, use, and disclosure of their Personal Information records and shall be given access to that information. Requests to access Personal Information held by the Corporation should be directed to the Corporation's Privacy Officer.
- 20. Requests must be made in writing or by e-mail. Individuals may be required to verify their identity in order to access their Personal Information. Any such documentation provided shall be used for verification purposes only.

- 21. The Corporation responds to requests for access to Personal Information within thirty (30) days of receipt of the request, or as may be permitted in accordance with applicable privacy legislation.
- 22. A fee for reasonable costs incurred may be charged when responding to more complex requests. The individual will be informed of the applicable fee.
- 23. Requested information will be provided in a form that is generally understandable.
- 24. The Corporation will be as specific as possible when describing third parties to whom it has disclosed Personal Information about an individual. When it is not possible to provide a list of the organizations to which it has actually disclosed information, the Corporation will provide a list of organizations to which it is likely to have disclosed information.
- 25. Individuals are permitted either to view the original record, or to request a copy, subject to limitations as permitted or required by law. To preserve the integrity of the record and ensure that documents are not removed from the Corporation, individuals wishing to view an original record will do so at the Corporation's head office and under the supervision of designated the Corporation personnel.

#### **Limitations on Access**

- 26. The Corporation will only refuse access to information about you in those circumstances permitted or required by applicable privacy legislation.
- 27. In the event that the Corporation refuses to provide access to information, it will provide you with the reasons for its refusal upon request. Exceptions may include information that contains references to or opinions of other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, or information that is subject to solicitor-client or litigation privilege. The Corporation will respond to your requests for access in accordance with applicable privacy legislation.

### **Maintenance of Personal Information**

- 28. Personal Information shall be kept as accurate, complete, and up-to-date as necessary for the purposes for which it is to be used.
- 29. Individuals have the right to challenge the accuracy and completeness of the Personal Information that is maintained by the Corporation and have it amended as appropriate.
- 30. Individuals seeking a correction or amendment to their Personal Information should direct their requests in writing to the Corporation's Privacy Officer.
- 31. All formal requests to amend Personal Information must be accompanied by appropriate supporting documentation. The Corporation's Privacy Officer will manage any exceptions. The amended information will be transmitted to third parties, as appropriate.
- 32. If the individual is not satisfied with the results of the request, the Corporation shall internally document the issue, and provide a response. The existence of the unresolved challenge will be transmitted to third parties, as appropriate.

## **Storage and Security of Personal Information**

- 33. Personal Information will be retained only as long as necessary and will be disposed of in a manner that is appropriate to the sensitivity of the information. We render client Personal Information non-identifying, or destroy records containing Personal Information once the information is no longer needed. We use appropriate security measures when destroying client Personal Information, including shredding paper records and permanently deleting electronic records.
- 34. Personal Information will be protected by security safeguards, appropriate to the sensitivity of the Personal Information.
- 35. The Corporation uses cloud-based services to store information in the following countries: Canada, the United States and Israel. Where Personal Information is stored or processed outside of Canada, it is subject to the laws of that foreign jurisdiction, and may be accessible to that jurisdiction's governments, courts or law enforcement or regulatory agencies.
- 36. We will notify all required authorities including the Office of the Information and Privacy Commissioner of Canada and/or the Information and Privacy Commissioner of Ontario, without delay, of a security breach affecting Personal Information if it creates a real risk of significant harm to individuals.

### **Challenging Compliance**

- 37. Inquiries or complaints concerning compliance with this Privacy Policy should be addressed, in writing, to the Corporation's Privacy Officer.
- 38. If you are not satisfied with the response from our Privacy Officer after making a complaint, you may have recourse to additional remedies under applicable privacy legislation. For further information, please contact the Federal Privacy Commissioner or your provincial Privacy Commissioner, as applicable.

## **Questions And Complaints**

If you have a question or concern about any collection, use or disclosure of Personal Information by the Corporation, or would like to request access to your own Personal Information, please contact:

Privacy Officer: Boaz Citrin, boaz@alzaihealth.com

Adopted and approved by the Board: October 15, 2025.