

# INTRON PRIVACY POLICY

Version 01 - January 2023

Intron Innovation Limited located at 3, Cornelius Odinjor Crescent, Chevy View Estate, Chevron Drive, Lekki, Lagos, Nigeria and all of its entities (“Intron”) are data protection-compliant entities committed to the protection of all data collected and the privacy of all data subjects. The contents of this Privacy Policy provide clear details of our data collection process, its use, and how we may share this data. It also provides you with the choices available to you with respect to your data. The processing of your data is carried out for purposes of medical care or community welfare and undertaken by or under the responsibility of a professional(s) who owe a duty of confidentiality.

## CONSENT

By clicking the link accepting the terms of this policy, the data subject has agreed to have read the terms of the policy to full understanding and explicitly and unambiguously consents to the collection, use and transfer, storage in electronic and other form of the data subject’s data as contained in this document and for the purposes specified in this document, in accordance with applicable data protection regulations.

## 1.0. APPLICATION OF THE PRIVACY POLICY

- 1.1. This Privacy Policy applies to [www.intron.health](http://www.intron.health) as well as other related websites that we own and operate, our applications and/or APIs including medical transcription and speech data and the Electronic Medical Record (EMR), and online services (the “Site”). If you do not agree with the data practices described in this Privacy Policy, you should not use the site or any related Services.
- 1.2. This Privacy Policy does not apply to any third-party applications or software that integrate with any of our services through the Site (“Third Party Services”), or any other third-party products, services, or businesses.

## 2.0. WHAT WE COLLECT

We collect information that relates to identified or identifiable individuals (“personal information”) as follows:

- 2.1. **Information you give us** - You may give us personal information when you either provide information relating to yourself, or to third parties who use our Services, or other communications with us, such as:
  - 2.1.1. Personal and Business Contact information, such as your first name, last name, postal address, email address, telephone number, job title, and employer name.
  - 2.1.2. Profile information, such as your username and password, picture, industry, interests, and preferences.

**2.1.3.**Content you post on our Site or Platform (text, images, photographs, messages, comments, or any other kind of content that is not your e-mail address or phone number).

**2.1.4.**Feedback and correspondence, such as information you provide in your responses to surveys, when you participate in market research activities, report a problem with our Site, receive customer support, or otherwise correspond with us.

**2.1.5.**Transaction information, such as details about purchases you make through the Site, registrations you make through our Site, and billing details.

**2.1.6.**Usage information, such as information about how you use our Site and interact with us.

**2.1.7.**Marketing information, such as your preferences for receiving marketing communications and details about how you engage with them, as well as information relating to your demographics and interests.

### **3.0. CHANGES TO YOUR PERSONAL INFORMATION**

You may notify us at any time if any of the personal information relating to you changes at any point in time as it is important that the personal information we hold about you is accurate and current. You may contact us as is provided in this document.

### **4.0. COOKIES**

#### **4.1. What are cookies and similar technologies?**

**4.1.1.**We may collect personal information using “cookies “. Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

**4.1.2.**We use two broad categories of cookies: (1) first-party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Site; and (2) third-party cookies, which are served by service providers on our Site, and can be used by such service providers to recognize your computer or mobile device when it visits other websites or online services.

### **5.0. HOW WE USE YOUR INFORMATION**

**5.1. With your consent** - We may use or share your personal information with your consent, such as when you request for services to be rendered by third-party resources, instruct us to take a specific action with respect to your personal information, instruct us to transfer your records to a third party, consent to

participate in additional surveys (where legally permissible), let us post your testimonials or endorsements on our Sites, or opt into third party marketing communications.

**5.2. To provide the Services you request** - If you use our Site, sign up for, or request to participate in a particular Service, we will process the personal information you give us or that we receive from relevant parties as necessary or appropriate for us to provide that Service. For example, processing maybe carried out for purposes of medical care or community welfare and undertaken by or under the responsibility of a professional owing a duty of confidentiality. We may also process your personal information to: operate, maintain, administer, and improve our Site, for processing payments, to better understand your needs and interests, and personalize your experience with the Services; and provide support and maintenance for our Services.

**5.3. For compliance, fraud prevention, and safety** - We use your personal information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Service; (b) protect our rights, privacy, safety, or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

**5.4. Miscellaneous processing** - If we process personal information in connection with our Services in a way not described in this Privacy Policy, this Privacy Policy will still apply generally (e.g. with respect to your rights and choices) unless otherwise stated when you provide it. Note that we may, without your consent, also process your personal information on certain public interest grounds. For example, we may process personal information as necessary to fulfill our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest.

## **6.0. PAYMENT PROCESSING**

**6.1.** Intron partners with payment gateways (like Paystack, GTPay, and Interswitch) to provide an instant payment service to Hospitals. **Intron DOES NOT process payments. We DO NOT store patient bank account numbers or card details.** Intron directly integrates with existing payment providers/gateways ratified by the Central Bank of Nigeria (CBN) to process interbank payments in Nigeria. Payments on the Intron application DO NOT come into Intron's bank account. As with other merchants, payments go directly from the patient's account through the payment gateway to the CBN clearinghouse before being deposited directly into the designated bank account.

**6.2.** For processing the payment of vendors and service providers, Intron may store bank account details provided by such vendors or service providers as part of processing payments to the vendors or service providers.

## **7.0. HOW WE SHARE YOUR INFORMATION**

Except as described in this Privacy Policy, we do not share the personal information that you provide to us with other organizations. We generally disclose personal information to third parties for the following purposes:

**7.1. Affiliates** - We may disclose your personal information to our parent company, subsidiaries, joint ventures, or other corporate affiliates for purposes consistent with this Privacy Policy.

**7.2. Service Providers & Business Purposes** - We may employ third-party companies and individuals to administer and provide the Services on our behalf (such as payment processing, technical support, and database management services). We may also disclose your data in connection with certain other business and operational purposes, such as data security monitoring, service analytics, internal research, quality control, etc. We generally share your personal data as you request or in accordance with certain business purposes. We may disclose the following categories of information:

**7.2.1.** Personal and Business Contact information, such as your first name, last name, postal address, email address, telephone number, job title, and employer name.

**7.2.2.** Profile information, such as your username, picture, industry, interests and preferences.

**7.2.3.** Content you post on our Site or Platform, including audio or visual content (voice, text, images, photographs, messages, comments) or any other kind of content that is not your e-mail address.

**7.2.4.** Feedback and correspondence, such as information you provide in your responses to surveys, when you participate in user or market research activities, report a problem with our Site, receive customer support or otherwise correspond with us.

**7.2.5.** Transaction information, such details about purchases you make through the Site, registrations you make through our Site, and billing details.

**7.2.6.** Usage information, such as information about how you use our Site and interact with us.

**7.2.7.** Marketing information, such as your preferences for receiving marketing communications and details about how you engage with them.

**7.2.8.** Unique user identifiers and other information collected in connection with cookies or similar technologies.

**7.2.9.** Any other personal information described in this policy.

**7.3. Professional advisors** - We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**7.4. Compliance with Laws and Law Enforcement; Protection and Safety** - We may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Services; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

**7.5. Business Transfers** - We may sell, transfer or otherwise share some or all of our business or assets, including this site, which may include your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

## **8.0. YOUR RIGHTS AND CHOICES**

**8.1. Access, update, correct or delete your information** - All account holders may access, complete, and review the personal information in their registration profile by logging into their account. Users may contact us in the event they:

**8.1.1.** require updating, correction or deletion of any information on their account where such information is inaccurate, out of date, incomplete or misleading via email: [intron@intron.io](mailto:intron@intron.io). Intron may conduct a verification process before carrying out such requests.

**8.1.2.** You may request that your personal data be erased, and we will oblige you of such request without undue delay, provided that such personal data are no longer necessary in relation to the purposes for which they were collected or processed or that we have no other lawful basis to retain such personal data. Sub Users on our EMR platform shall make such request through their respective Parent Users.

**8.1.3.** You may request a restriction of the processing of your personal data pending the resolution of a request or an objection made by the account holders or the establishment, exercise or defense of legal claims.

**8.1.4.** An account holder can request from us via our email: [intron@intron.io](mailto:intron@intron.io) a confirmation as to whether we store or process his/her personal data, and

where that is the case, the purpose for which his/her data are processed, the categories of his/her personal data concerned, the recipients or categories of recipient to whom his/her personal data have been or will be disclosed, particularly recipients in third party countries or international organizations where applicable; where practicable, the period for which his/her personal data are stored or where this is impracticable, the criteria used to determine that period will be stated.

**8.1.5.** You may, where applicable, request to obtain a copy of your personal data in a commonly used electronic format.

**8.1.6.** Where you are dissatisfied by our decision, action of inaction, you may lodge a complaint with the applicable data protection agency of our jurisdiction, for redress.

**8.2. Email communications** - You may opt out of newsletters and marketing related emails from us by following the unsubscribe instructions on a link at the bottom of each such email, or by contacting us via email at [intron@intron.io](mailto:intron@intron.io). You may continue to receive service-related and other non-marketing emails. If you authorized the sharing of your contact information with a third party, contact that third party directly to opt out of receiving any communications they may send.

**8.3. Withdrawing consent** - If you gave us consent to use your personal information, you have that right to withdraw at any time your consent to the processing of your data by clicking the provided link on your profile in the relevant application, but if you wish to update or delete it, please contact us via email - [intron@intron.io](mailto:intron@intron.io)

**8.4. Choosing not to share your personal information** - Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services and may need to close your account. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

**8.5. Uninstalling our applications** - You can stop all collection of information by the application(s) by uninstalling the application(s). You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

**8.6. Cookies** - You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the "settings," "help" "tools" or "edit" facility).

## **9.0. SECURITY**

The security of your personal information is important to us. We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it.

## **10.0. OTHER SITES AND SERVICES**

Our Site may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third party. We do not exercise control over third party websites or services and are not responsible for their actions. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

## **11.0. USER GENERATED CONTENT**

We may make available on our Site, or link to, features (such as Discussion Forum) that allow you to share information online. Please be aware that whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage or dissemination of such publicly disclosed personal information. By posting personal information online in public forums, you may receive unsolicited messages from other parties.

## **12.0. CHANGES TO THIS PRIVACY POLICY**

**12.1.** We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy, we will post an updated version of the Privacy Policy on our Site.

**12.2.** Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Site (or as otherwise indicated at the time of posting). In all cases, your continued use of our Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

## **13.0. RETENTION**

**13.1.** We will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, and or for the purposes of satisfying any legal, accounting, or reporting requirements.

**13.2.** To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

**13.3.** We may anonymize any information provided to us (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

#### **14.0. DISPUTE RESOLUTION**

**14.1.** This Agreement shall be governed by and interpreted in accordance with the laws of the Federal Republic of Nigeria.

**14.2.** In the event of any dispute, the parties shall take reasonable steps to resolve the dispute amicably. Where the parties are unable to resolve the dispute, the dispute may be referred to Mediation directed by a Mediator appointed by the High Court of Lagos State, under the Rules of the Lagos State Multidoor Courthouse. The Mediation shall hold in Lagos (parties may agree to attend virtually) and shall be conducted in English Language.

**14.3.** Where parties are unable to resolve the dispute via Mediation, either party may submit the dispute to the jurisdiction of the Lagos State Courts, under the applicable Laws of Lagos State and the Laws of the Federal Republic of Nigeria.

**14.4.** Nothing in this Agreement shall preclude either Party from commencing legal proceedings in the Court for the purposes of protecting its confidential information, as contained in the Contract, by means of injunctive or other equitable relief.

#### **15.0. CONTACT US**

If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, please contact us at - [intron@intron.io](mailto:intron@intron.io)