

Privacy Policy version 1.0

What this policy covers

Limbus AI Inc ("Limbus AI") is committed to respecting your privacy and personal data. Limbus AI has adopted this privacy policy ("Privacy Policy") to inform you about how we ensure that your personal data is processed in the right way and in accordance with applicable law.

This privacy statement applies to our limbus.ai domain and our applications and service platforms that link to this Privacy Policy ("Services").

To be able to conduct our business, including to provide, market, and bill our products and services, we must process personal data about you. Customers, Prospect Customers, Attendees and Visitors will all be referred to as "you" in this Privacy Policy.

Limbus AI is the data controller for the processing of your personal data and is responsible for ensuring that the processing is made in compliance with applicable law.

If you have questions about this Privacy Policy, or the manner in which Limbus AI collects, uses or otherwise processes your personal information, please contact us by sending an email to the following e-mail address: privacy@limbus.ai. You find our full contact details at the last page of this Privacy Policy.

What information we collect about you

Information we collect manually

Category 1: Customer or potential customer contact Information

Contact information such as name, title, address, email address and location of workplace.

Orders and payment information such as order history and payment information.

Training information such as training history on the use of our products.

Category 2: Information you provide through support channels

We collect information when you choose to submit information regarding a problem you are experiencing with our support team. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

Category 3: Payment information

We collect certain payment and billing information when you register for certain paid Services.

For example, we ask you to designate a billing representative, including name and contact information, upon registration.

Information we collect automatically

The following only applies to our Limbus Contour Desktop application.

Category 4: Usage Information

We keep track of certain information about you when you interact with our Limbus Contour Desktop Application. This information includes the features you use, the number of DICOM Image Series you have contoured using the application, and non-sensitive information regarding each DICOM Image Series that you have contoured using the application.

You can disable our collection of this information from the Services by contacting privacy@limbus.ai. Our ability to provide services may be impacted by disabling collection of this data.

Unless otherwise agreed upon, Limbus AI will not collect any patient, medical or other protected health information regulated by PIPEDA (CANADA), HIPAA (USA), or any similar federal, state, provincial, or national laws, rules or regulations.

Category 5: Device Information

We collect information about your computer when you install and use our Limbus Contour Desktop Application. We also collect information through your device about your operating system, computer MAC address identifiers, application version information, and crash data.

You can disable our collection of this information from the Services by contacting privacy@limbus.ai. Our ability to provide services may be impacted by disabling collection of this data.

For full transparency a description of all automatically collected data is supplied below:

Data	Category	Description
Number of DICOM Series Contoured	Category 4	Number of DICOM image series contoured by the user.
Structures	Category 4	List of Structures contoured for an imported DICOM Image Series
Empty Structures	Category 4	List of Empty Structures contoured for an imported DICOM Image Series
Template	Category 4	Template applied to an imported DICOM Image Series
Run Time	Category 4	The time in seconds that it took to complete contouring for an imported DICOM Image Series
Mode	Category 4	Either Automatic or Manual. The mode of the application which was used to contour an imported DICOM Image Series.
Import Rule	Category 4	Import Rule used to classify an imported DICOM Image Series.

UID Hash	Category 4	A unique identifier generated by Limbus Contour for the contouring session. The UID hash cannot be used to identify a specific DICOM Image Series or patient and contains no identifiable information.
Operating System	Category 5	The operating system that is running an instance of the application (Windows/MacOS)
Operating System Version	Category 5	The version of the operating system that is running an instance of the application
Processor	Category 5	The model number of the processor that is running an instance of the application
MAC Address	Category 5	The MAC address of the computer that is running an instance of the application
Application Version	Category 5	The version of the Limbus Contour application.
GPU Enabled	Category 5	Whether or not the running instance of the application is using GPU acceleration
Crash Reports	Category 5	When an error occurs in the application, we may collect the Error code and traceback (location in source code where error occurred).

How we use the information we collect

General Purpose

At Limbus AI, we process your personal data to provide you with the services we offer in the best way possible. We use your personal data for:

- Administration and carrying out our contractual obligations towards the company or organization you represent
- Fulfilling our regulatory obligations
- Marketing, including direct marketing
- Product improvement and support
- Usage based billing
- Otherwise correspond with you through email

The information we collect about you is primarily processed to help us ensure proper technical functioning and to improve the quality and content of our Website and Services – based on the lawful purposes of "consent" for the Website, "legal obligations" and "contractual necessity" for Services, or "legitimate interest" as allowed under GDPR.

Direct Marketing

Limbus AI may also use your personal information for the purpose of marketing our products and services. If you do not want to receive marketing material from us, you may opt out or exercise your right to object (Article 5) as detailed below:

- For electronic communications, you can click on the unsubscribe function in the communication;
- You can email Limbus AI at privacy@limbus.ai

Transfer to Third Parties

We provide access to our employees in order to process your personal data.

Limbus AI will not disclose your personal data to third parties, unless it is necessary in the context of providing our Services and/or optimising them. To that end, Limbus AI may appeal to third parties in order to:

- Send you newsletters;
- Capture your opinion on our products and services;
- Optimize your experience on our Website;
- Facilitate usage based billing:
 - Usage information (Category 4 and 5) are handled through Mixpanel (<https://mixpanel.com>). This platform provides a secure, protected environment for storing usage based information.
- Facilitate credit card transactions;
 - Credit card transactions are handled through Intuit (<https://www.intuit.com>). Credit card data is encrypted and protected. Limbus AI does not have access to the full credit card number and the information.

- Operate our Website.
 - The Website operates on Amazon S3 (<https://aws.amazon.com/privacy>). This platform provides a secure, protected computing environment for users to view the Website.

Please see the links above to see how these third parties will be obligated to use your personal data.

Limbus AI will not sell, hire out or pass on your personal data to third parties, except in the situations provided for in this Policy or unless you explicitly provide prior consent.

It is however possible that Limbus AI will disclose your personal data in the following scenarios:

- If Limbus AI is obligated to do so, following a court order or to comply with imperative laws and/or regulations, or to safeguard and defend our rights.
- In case of whole or partial reorganization or cession of Limbus AI' activities, whereby Limbus AI reorganizes, transfers, ceases business activity or in case Limbus AI goes bankrupt, your personal data may be transferred to new entities or third parties.

Limbus AI will, if reasonably possible, try to inform you in advance of such transfers, unless revealing this information is subject to legal constraints. Informing you beforehand may not always be possible.

Information Usage by Category

For full transparency, specific information on how we use your personal data is broken out by data category below.

Category 1: Customer or potential customer contact Information

We process your personal data to be able to administer and carry out our obligations towards the company or organization you represent (ex: providing software licenses for our Services under your name).

In case of a dispute regarding e.g. payment, we are entitled to process your personal data to establish, exercise or defend a legal claim.

We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of license expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, recall notices, and administrative messages.

We process your personal data to be able to fulfil our regulatory obligations as a medical device company. This includes to document, where required, which representatives of our Customers that have participated in trainings on the use of our products and to retain contact details in case we need to send safety notices to the company or organization you represent.

Category 2: Information you provide through support channels

We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

Category 3: Payment information

We use payment information to provide the Services to you, including to process transactions with you. With regard to credit card payments; credit card information is processed by a third party. Credit card information is not stored by Limbus AI directly.

Category 4: Usage Information

We use usage information for usage based billing (Ex: usage of Limbus Contour application based on the number of contoured patients).

We use usage information for research and development. We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and

improvement of the Services. For example, to improve contouring runtimes in our Limbus Contour application we may analyse run-times based on CPU processor. We may use that information to develop a new version that improves run-times for that CPU in the future.

If you disable our collection of Usage Information our ability to provide certain services may be impacted.

Category 5: Device Information

We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve our Services.

If you disable our collection of Device Information our ability to provide technical support may be limited.

Legal bases for processing (for EEA users):

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your

employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

How long we hold your data

Limbus AI only processes your personal information for as long as necessary. This means that we do keep a record of your data for as long as it is required or justified by the law or by another legal obligation, or for the period for which this would be necessary for the aforementioned purposes. Based on the categories of data described in [“What information we collect about you”](#) we hold your data as follows:

- **Category 1:** Contact information such as name, title, address, email address and location of workplace, orders and payment information such as order history and payment information, and training information such as training history on the use of our products will be stored for the duration of your relationship with Limbus AI and for 10 years thereafter.
- **Category 2:** Information you provide through support channels will be stored for the duration of your relationship with Limbus AI and for 10 years thereafter.
- **Category 3:** Information you provide for payment purposes will be stored for the duration of your relationship with Limbus AI and for 10 years thereafter.
- **Category 4:** Usage based information will be stored for as long as you subscribe to Limbus software products plus one year.
- **Category 5:** Automatically collected device information will be stored for 24 months.

If Limbus AI ceases to exist, e.g. by way of a fusion, liquidation or bankruptcy, or if Limbus AI’s customer database will be transferred to an acquiring company we will delete your personal data as long as we are not required to keep it in order to comply with legal obligations.

If Limbus AI is acquired by a company or split into several parts in connection with a restructuring we will continue to store and process your personal data in accordance with the terms and conditions of this Privacy Policy, unless you receive different information in connection with the acquisition.

Your rights to data access and control

Right of access and right to obtain a copy

You have the right to freely obtain access to your personal data, as well as to be informed about the purpose of the processing by Limbus AI.

Right to rectification, erasure, or restriction

You have the choice to share your personal data with Limbus AI. You also have the right to request Limbus AI rectify your personal data or have it erased. You can also request the processing of your personal data to be restricted.

When you choose not to share data, or when you request that we erase your personal data, it may prevent us from providing you with several Services and access to the Website.

Right to object

You have the right to object to the processing of your personal data when you have legitimate reasons to do so. You also have the right to object to the use of your personal data for purposes of direct marketing. In such case specific reasoning will not be requested.

Right to data portability

You have the right to obtain your personal data which is processed by Limbus AI in a structured, commonly used and machine-readable format and/or to transfer this data to another data controller.

Right to withdraw consent

When the processing is based on prior consent you have the right to withdraw this consent.

Automated decisions and profiling

The processing of your personal data does not include profiling, nor shall you be subjected to automated decisions.

Exercising your rights

You can exercise the above-mentioned rights by sending an e-mail with an enclosed copy of your identity card to privacy@limbus.ai.

Right to file a complaint

For EU residents using the Website or Services: If you have any complaints about the way Limbus AI collects, uses and/or processes your personal data, you have the right to file a complaint with your own European or EU-vested authority.

This does not affect a procedure before the civil court. If you have suffered damages caused by the processing of your personal data, you can file a claim for damages.

Contact

If you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights, you may contact us in any of the following ways:

Limbus AI, Inc

2076 Athol Street, S4T3E5, Regina, Saskatchewan, Canada

Email: support@limbus.ai

Webpage: <https://www.limbus.ai>

Changes and updates

The latest update of this Privacy Policy was conducted in August 2019. We reserve the right to change this Privacy Policy from time to time in order to comply with changed legislation or our personal data processing. Changes will be published on this Website.