

Recruitment Privacy Policy

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Confidentiality

This document is for recruitment use only. Therefore, sharing outside the Organization is not permissible based on corporate and legal obligations.

For all questions regarding this policy: privacy@petal-health.com

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This Recruitment Privacy Policy (the “Privacy Policy”) covers the processing of personal information relating to human resources by Petal Solutions Inc., Petal Medical Billing Inc. (doing business as Xacte, StatGo, Dobsi Medical Billing, Medi-Com), Medcom Billing Systems, Petal Solutions Europe B.V., Petal Health Inc., and any of our current or future affiliates (“Petal” or “us”). We are committed to protecting the privacy of personal information. Our Privacy Policy explains what personal information is and what we collect, how it is used, and the steps we take to ensure personal information is handled sufficiently.

If you have any questions, please do not hesitate to contact our Privacy Officer.

Attention: Privacy Officer

privacy@petal-health.com

350, boul. Charest Est, bureau 300 Québec (Québec) G1K 3H5

If you are in European Union (“EU”), we control the means and purposes of processing regarding your personal information, as explained under the General Data Protection Regulation (“GDPR”). For more information regarding your rights under GDPR, you can also reach out directly to our Privacy Officer mentioned above, or to our EU Representative, if you have any questions on how we process your personal information, or even to exercise your rights.

EU Representative

Petal Solutions Europe B.V.

Email: privacy@petal-health.com

Mail: 140 Bis, rue de Rennes

75006 Paris, France

Our Commitment to you (Privacy Charter)

Petal is committed to protecting your personal information. The types of personal information we collect, how it is used, and the steps to ensure it is handled sufficiently are fundamental to us.

Let’s start by making sure that you understand the expression “personal information”. We consider that personal information is any information that can directly, or indirectly, allow for your identification. You may also have heard similar expressions such as “personally identifiable information”, “PII” or “personal data”.

Different laws may define what constitutes personal information differently, which may limit the availability of certain rights.

Examples of personal information include:

- An individual's name
- Home address
- Home phone number
- Personal email address
- Date of birth

Moreover, this Privacy Policy does not apply to third-party websites, services, applications or even URLs that you may access as part of your employment with us, or otherwise when applying to a career opportunity with us, or in any interactions with us ("Third-Party Services"). It is important that you take the time to review the privacy practices of Third-Party Services before you decide to use Third-Party Services, including any terms and conditions.

1. What personal information do we collect, and for what purposes?

We collect and use your personal information as part of the recruitment process, which is in compliance with applicable privacy laws, including PIPEDA, GDPR and provincial legislation. We process your data only where we have lawful basis, which may include contractual necessity such as managing your employment relationship, complying with legal obligations, pursuing our legitimate interests or business purposes in a proportionate manner, obtaining your consent where required, or protecting vital interests in exceptional circumstances.

The personal information we collect from you is for recruitment, and for similar administrative purposes. We do not sell your personal information, nor do we conduct marketing using your personal information. We collect personal information directly from you, except if you make personal information available to us through a third-party, such as linking your LinkedIn profile to your job application. Social media is not a standard practice in our recruitment activities, except that we may review your LinkedIn profile if you make personal information publicly available, or you apply for a position via LinkedIn.

By providing us with your personal information, you agree to its collection and use as outlined in this Policy. For more details, you can consult the table below:

Purpose of Processing	Explanations
To promote job offers to candidates	We use third-party services such as, LinkedIn and Indeed to publish and promote our job offers. We may promote these job offers based on selected audience, from time to time. These consents are managed

	through your LinkedIn account, or Indeed accounts.
To process your application for a job opportunity	When you apply for a job opportunity, we collect information such as contract details, resumes, email address, address, work history, motivation letter and other documents, provided with the application, notes, and ratings about candidates. Candidate information is stored by our supplier ATS Recrutee. Recrutee is also used to manage applications, such as to communicate with applications and schedule meetings. For this purpose, we will collect your availabilities, and the content of any messages shared with us.
To conduct criminal checks and other verification prior or during your employment	<p>Different positions may have varying requirements for independent employment verification.</p> <p>Criminal checks are performed by Mintz Global Screening. Credit checks are performed for certain positions with broad access to databases (e.g., business intelligence). If so, we will inform you and obtain your explicit consent before making such verification.</p> <p>For some executive positions, you may be invited to complete a psychological test, in which case, you will be provided with aggregated results. We may also verify educational credential through partners such as, Mintz Global Screening and review social media.</p> <p>These verifications may be conducted periodically during your employment, with your consent.</p>

2. Where do we store your personal information?

We make every effort to host personal information on Canadian servers, just as we place great importance on this criterion when selecting our third-party technology service providers. However, in certain circumstances, your personal information may be transferred to another jurisdiction. We ensure that your personal information benefits from the same protection as it does where you are located. That's why we enter into agreements with our service providers and ensure that they provide reasonable reassurances that they will protect your personal information and that they meet equivalent data protections.

3. Do we share your personal information with third parties?

Below is a table that contains the categories of third parties with whom we share your personal information and examples of these third parties.

Category of Third-Party	Explanations
Recruitment Partners	We use an applicant tracking system (“ATS”) called Recrutee to manage applications, and in some cases, such as for executive positions, we may use external recruiting firms.

4. How long do we keep your personal information?

When it comes to your personal information during the recruitment stage, we must reconcile the need to retain personal information for the minimal retention periods required under applicable laws (e.g., allow you to exercise your rights or for fiscal purposes) and our obligations to delete, destroy or anonymize personal information when it is no longer needed. We adopted a Data Retention and Disposal Policy that governs how we apply retention periods to your data. Personal information that is no longer required to be retained is deleted in a secure manner based on applicable law.

5. How can you exercise your rights over your personal information?

Under various privacy laws, candidates are granted rights over their personal information, such as accessing and modifying it when outdated or inaccurate. The rights provided to recruitment candidates under the applicable legislation are the following.

As a candidate during the recruitment process, you can exercise your rights over personal information by contacting our Privacy Officer at privacy@petal-health.com or by mail at the address above. Your request will be shared with the human resources department, which will be able to assist you. If we cannot comply with your request, we will inform you within 30 days, or sooner, if required by applicable laws. We may need to ask for your personal information to validate your identity

6. Will this Privacy Policy be modified?

We may change this Privacy Policy from time to time. Candidates are invited to refer to our website to consult the latest version.