



ORDO™: Privacy Policy

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The GBS Privacy Policy describes the privacy practices of GBS's apps and websites.

Summary of Key Points

- EasyID®, ORDO™, and other related software part of the ORDO™ suite collectively are a set of applications and services that could be, but not necessarily limited to, used by a Patient to access, keep current and/or complete materials related to a scheduled appointment or related medical event.
- We do not store or maintain personal information related to Patients and/or Users of the EasyID® Software for our own personal use or interests.
- **Where your consent is required, we will obtain your permission before (i) accessing information stored on your device relating to your use of, and engagement with, websites and apps and crash reports; and (ii) using automated systems to analyze your content. You can withdraw your consent to such activities at any time.**
- **This policy explains when we process personal information for our legitimate interests.**

WHAT DOES THIS PRIVACY POLICY COVER?

This privacy policy describes how GBS (also referred to as "we," "us" or "our") will make use of your information in the context of:

- ORDO™ related websites; and web-based services;
- Desktop apps and mobile apps (both referred to as "apps") that include a reference to this policy.

WHAT INFORMATION DOES GBS COLLECT ABOUT ME?

GBS customer support

When you contact us for support or other offerings, GBS collects information that identifies you. This includes:

- Name;
- Date of birth;
- Company name;
- Email address;
- Telephone number;
- Address.

To help keep our databases current and to provide you the most relevant service experience, we may combine information provided by you with information from third party sources, in accordance with applicable law. For example, the size, industry, and other information about the company you work for (where you have provided company name) will be obtained from sources including, professional networking sites and information service providers.



ORDO™ apps and websites

We collect information about how you use our apps and websites, including when you use a desktop app feature that takes you online (such as a photo syncing feature). Depending on the app or website, this information may be anonymous or it may be associated with you. It includes:

- IP address;
- Type of browser and device;
- Use and navigation of websites and apps (collected through cookies and similar technologies, or by GBS servers when you are logged in to the app or website);
- Analysis of your content (e.g., documents, photos, videos, activity logs) which is sent or received using an online feature of an ORDO™ app or website, or which is stored on GBS servers.

ORDO™ emails and texts

Emails and Text messages, we send you may include a technology that tells us whether you have received or opened the message, or clicked a link.

Buttons, tools, and content from other companies

ORDO™ apps and websites may include buttons, tools, or content that link to other companies' services (for example, a "Payment" button). We may collect information about your use of these features. In addition, when you see or interact with these buttons, tools, or content, or view an ORDO™ web page or app containing them, some information from your browser may automatically be sent to the other company. Please read that company's privacy policy for more information.

GBS acting on your behalf

In certain instances, GBS is acting only on your behalf for personal information collected and processed by our services. In such cases, GBS is acting only on your instructions in order to facilitate the service requested by you, and you will be responsible for the information shared.

HOW DOES GBS USE THE INFORMATION IT COLLECTS ABOUT ME, AND WHAT ARE THE LEGAL BASES FOR THESE USES?

GBS uses the information we collect about you for the following purposes:

- To fulfill a contract or take steps linked to a contract: this is relevant where you register to use an ORDO™ app or website (whether paid, or as a free trial). This includes:
 - Providing you with the ORDO™ websites and apps for which you have registered, and any other services or products that you have requested;
 - Verifying your identity;
 - Taking payments;
 - Sending you necessary communications (for example, related to payments or expiration of your subscription); and
 - Providing customer service or support.
- As required by GBS to conduct our business and pursue our legitimate interests, in particular:
 - Providing you with the ORDO™ websites and apps for which you have registered and any other products and services you have requested;
 - Analyzing your use and measuring effectiveness of our websites and apps to better understand how they are being used so we can improve them;
 - Using automated systems to analyze your content through techniques such as machine learning in order to improve our services and the user experience);

- Diagnosing problems in our apps and websites;
- Detecting, preventing, or otherwise addressing fraud, security or technical issues, as well as to protecting against harm to the rights, property or safety of GBS, our users, or the public;
- Investigating and responding to any comments or complaints that you may send us;
- Checking the validity of the sort code, account number and card number you submit if you use a credit or debit card for payment, in order to prevent fraud (we use third parties for this);
- In connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of information in connection with government agency requests, legal process or litigation).

Where we process your information based on legitimate interests, you can object to this processing in certain circumstances. In such cases, we will cease processing information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons.

- Where you give GBS your consent:
 - Accessing information stored on your device relating to your use of, and engagement with, websites and apps and crash reports;
 - Accessing information stored on your device which you allow us to receive through device-based settings (e.g., photos, location and camera) in order to provide certain functionality within our apps and websites; and
 - Using automated systems to analyze your content using techniques such as machine learning in order to improve our services and the user experience);

On other occasions where we ask you for consent, we will use the information for the purposes which we explain at that time. Where we rely on consent to process data, you can withdraw your consent to such activities at any time.

- For legal reasons:
 - Responding to requests by government or law enforcement authorities conducting an investigation.
 - To detect, prevent, or otherwise address fraud, security, potential illegal activities, or technical issues and software piracy (e.g., to confirm that software is genuine and properly licensed), helping to protect you as well as GBS.

Where this processing and these disclosures are not strictly required by law, GBS may rely on its legitimate interests and those of third parties described above.

DOES GBS SHARE MY PERSONAL INFORMATION?

Sharing for Fraud Prevention Purposes

We will share personal information with companies, organizations or individuals outside of GBS if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to detect, prevent, or otherwise address fraud, security or technical issues, as well as to protect against harm to the rights, property or safety of GBS, our users, or the public as required or permitted by law.



Sharing with Data Processors

We will also share your personal information with companies that help us to run our business by processing personal information on behalf of GBS for the purposes identified above. Such companies include providers of customer support services, payment processing services, fraud monitoring and prevention, email, texting, and other platforms and service providers, and hosting services. We require these companies to protect your personal information consistent with this Privacy Policy.

Other Information Sharing

GBS may also share your personal information:

- When you agree to the sharing;
- When we are required to provide information in response to a subpoena, court order, or other applicable law or legal process;
- When we have a good faith belief that the disclosure is necessary to prevent or respond to fraud, defend our apps or websites against attacks, or protect the property and safety of GBS, our customers and users, or the public;
- If we merge with or are acquired by another company, sell an website, app, or business unit, or if all or a substantial portion of our assets are acquired by another company, your information will likely be disclosed to our advisers and any prospective purchaser's advisers and will be one of the assets that is transferred to the new owner.

We may share or publish aggregate information that doesn't specifically identify you, such as statistical information about how customers use EasyID®.

IS MY PERSONAL INFORMATION DISPLAYED ANYWHERE ON ORDO WEBSITES OR APPLICATIONS?

No.

IS MY PERSONAL INFORMATION SECURE?

We work hard to protect your personal information. We employ administrative, technical, and physical security controls where appropriate, such as encryption, 2-step verification, and strict contractual confidentiality obligations for employees and contractors.

WHERE DOES GBS STORE MY PERSONAL INFORMATION?

Your personal information and files are stored on servers of companies we hire to provide services to us.

WHAT RIGHTS DO I HAVE IN RESPECT OF MY PERSONAL INFORMATION AND HOW CAN I EXERCISE THESE RIGHTS?

Under the law of some jurisdictions, you may have the right to ask us for a copy of your personal information; to correct, delete or restrict (stop any active) processing of your personal information; and to obtain the personal information you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this information to another controller.

In addition, you can object to the processing of your personal information in some circumstances.

These rights may be limited, for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or which we need to defend claims against us.



WITHDRAWING CONSENT

Where we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your information for other purposes, such as those set out above.

HOW LONG DOES GBS RETAIN MY INFORMATION?

We process and keep most personal information we have about you for as long as you are an active user of our products, services or apps. When you are no longer an active user, we begin deleting certain personal information that we no longer have a business reason to retain. However, we typically retain personal information related to our contract and business transactions with you as for as long as they are required by law after your last interaction with us.

WILL THIS PRIVACY POLICY CHANGE?

Occasionally, we may change this privacy policy to allow GBS to accommodate new technologies, industry practices, regulatory requirements or for other purposes. If we do, we will change the "last updated" date at the top of this policy and the revised policy will be posted so that you are aware of the information we collect, how we use it, and under what circumstances we may disclose it. Under certain circumstances (for example with certain material changes) we will provide notice to you of these changes and, where required by applicable law, we will obtain your consent. Notice may be by email to you, by posting a notice of such changes on our apps and websites, or by other means consistent with applicable law.