

Sleep Z Privacy Policy

AMOGH JOSHI

AMOGH JOSHI (or “Sleep Z”) respects the privacy of your personal information and is committed to protecting it and using it solely for the purpose for which it was collected. The objective of this privacy policy (the “Policy”) is to inform you of our privacy practises. We wish to provide you with information on why and how we collect your personal information and on how it is kept and used.

Scope and application

This Policy applies to all personal information, location information and electronic information collected by Sleep Z via our mobile applications (collectively the “Application”) or through our website (the “Website”) (the Application and the Website collectively referred to as the “Service”) and also through communications you may have with Sleep Z by email, social media or otherwise. This Policy is subject to the relevant Quebec and Canadian legislation, as well as all other applicable legislation and regulations.

This Policy does not apply to the collection, use and retention of your personal information on any of these platforms. We invite you to read carefully these platforms’ policies pertaining to privacy.

Your personal information: what we collect and why we collect it

We collect certain types of personal information and establish a file concerning the users of the Service (individually a “User”, and collectively the “Users”) or any other person communicating with us. When you register for the Service or accept to receive marketing and advertising material through email or other communication tools, Sleep Z will ask you to provide an email address and a user name; you may also create a user profile and have the option to provide your name, mailing address, age group, preferred language, and any other information (collectively the “Personal Information”). The legal bases for our processing of Personal Information are primarily that the processing is necessary for providing the Service and that the processing is carried out in our legitimate interests, which are explained immediately below. We may also process Personal Information upon your consent, asking for it as appropriate.

The Personal Information is collected and used notably for the following reasons:

to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service;

to understand and analyze the usage trends and preferences of our users, to improve the Service, and to develop new products, services, feature, and functionality;

to send you communications; or

to comply with legal and regulatory requirements, where applicable.

Personal Information we collect is used solely for the purpose for which it was collected. Your consent to the collection, use and disclosure of information for secondary marketing purposes (e.g. mailing or emailing of promotional offers, subscription to a newsletter) or for other purposes is not required for you to become a User of the Service. You may withdraw your consent at any time.

Sleep Z may occasionally send out communications regarding its Service to Users by email or otherwise. You can choose to receive communications from Sleep Z by ticking the appropriate box on a form or otherwise, as applicable. You may decide at any time to cancel your subscription to such communications by accessing your User account online and modifying your User preferences. You are also offered the possibility to cancel your subscription to such communications each time a communication is sent out.

Information that you share

The Service is based on Users' locations and submissions that may include certain personal information. You should be aware that the content you submit is not private or confidential and you should not have any expectation of privacy with respect to it. You must exercise caution and common sense when submitting information that may personally identify you or others.

Electronic information

We may sometimes collect information that is not of a personal nature when you visit our Website or access our Service through the Application, such as the type of device or Internet browser you are using, the type of operating system you are using, your IP address with your location and the domain name from which you were linked to our Website (collectively the "Electronic Information"). Furthermore, when you visit our Website, we may insert a data file on your computer, such as a cookie or other file of a similar nature. Cookies allow us to keep information about the use you make of the Service, including the date of your most recent visit, the pages you viewed and files you downloaded.

Sleep Z does not link the Electronic Information thus obtained with your Personal Information. Most Internet browsers allow you to erase cookies from your computer's

hard drive, to block them or to receive a warning before they are downloaded. Please refer to your browser's instructions to find out more about these functions. If you refuse cookies, you may experience problems in accessing the Service or even be prevented to use the Service.

We use Electronic Information to: (i) personalize our Service, such as remembering your information so that you will not have to re-enter it during a visit or on subsequent visits; (ii) provide customized advertisements, content, and information; (iii) monitor and analyze the effectiveness of Service and third party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Service.

How your Personal Information is stored and communicated

Sleep Z keeps Personal Information for a period of time it deems reasonable either to fulfill identified purposes or in accordance with the law, whichever time frame is longer. We establish retention criteria based on the type of information collected. Once the identified purposes have been reached and your Personal Information is no longer required or if you request that such information be deleted, we ensure it remains anonymous or destroy it in a way which ensures protection against unauthorized access or communication.

In certain circumstances, in order to perform the Service, we may disclose certain information that we collect from you: within our family of companies, including parents, corporate, affiliates, subsidiaries, business units and other companies that share common ownership; with third party service providers who provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Information as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information. Sleep Z services providers include without limitation Google Firebase, Facebook, Amplitude, Fabric and Flurry; with law enforcement and governmental entities when required by law. For greater clarity, we may disclose Personal Information or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies; and to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an

insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of your Personal Information commits to a privacy policy that has terms substantially consistent with this Policy.

When we disclose your Personal Information to third parties, we take reasonable measures to ensure that the rules set forth in this Policy are complied with and these third parties provide sufficient guarantees to implement appropriate technical and organisational measures.

Third parties information

Third parties' email addresses or other personal information you provided when inviting them to visit the Website or use the Application or when sending them a page from our Website, as the case may be, are not collected or kept by Sleep Z, unless these individuals have themselves provided their personal information and become a User of the Service.

Personal information regarding children

The information contained on our Website and/or the Application is not destined to children under the age of 16. Sleep Z does not knowingly collect any Personal Information regarding children under the age of 16 without obtaining parental consent. If you are under 16 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Information has been collected on the Service from persons under 16 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 16 years of age has provided Personal Information, then you may alert us as set forth in the "Information" section and request that we delete that child's Personal Information from our systems.

Security

All data is stored on servers with high-security safeguards, protected against misuse and access by unauthorized individuals. In conformity with this Policy, Sleep Z also protects Personal Information disclosed to third parties in order to maintain the information privacy and to respect the purpose for which it was collected. This information is only made available to individuals (employees or agents) who require access to such information to carry out their responsibilities. Sleep Z does not make any representation and guarantee regarding the protection of Personal Information performed by its goods or services providers and promotional partners, which is subject to their own privacy policies and not to this Policy.

Your Personal Information is kept and stored on our behalf by Google Cloud and Firebase and by our hosting company, Site5. It is possible that we change our hosting company, without prior notice, or that some of your Personal Information be hosted outside of Quebec or Canada at any time via our goods or services providers and promotional partners. While such information is outside of Quebec or Canada, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. However, our practices regarding your Personal Information will at all times continue to be governed by this Policy and, if applicable, we will comply with the General Data Protection Regulation (“GDPR”) requirements providing adequate protection for the transfer of Personal Information from the EU/EEA to third country.

Right to Access and Correct

On written request and subject to proof of identity, you may access the Personal Information that we hold, and ask that any necessary corrections be made, where applicable, as authorized or required by law. However, to make sure that the Personal Information we maintain about you is accurate and up to date, please inform us immediately of any change in your Personal Information.

Under the GDPR, you may be entitled to additional rights, including: (i) the right to withdraw consent to processing where consent is the basis of processing; (ii) the right to access your Personal Information and certain other supplementary information, under certain conditions; (iii) the right to object to unlawful data processing, under certain conditions; (iv) the right to erasure of Personal Information about you, under certain conditions; (v) the right to demand that we restrict processing of your Personal Information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, are processing, or believe your Personal Information is inaccurate; (vi) the right to data portability of personal data concerning you that you provided us in a structured, commonly used, and machine-readable format, under certain conditions; (vii) the right object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you, under certain conditions; (viii) the right to lodge a complaint with data protection authorities. If you want to learn more about your rights under the GDPR, you can visit the European Commission’s page on Data Protection at:

http://ec.europa.eu/justice/data-protection/index_en.htm.

HealthKit

The Service integrates the Apple HealthKit and complies with Apple’s terms and conditions regarding the use of such HealthKit. Notwithstanding the foregoing, we confirm that Sleep Z is not sharing any data collected via the HealthKit to any third

party unless previously approved by you and under the conditions stated in the present Policy. We do not use the information collected via the HealthKit for advertising purposes nor are we selling the data collected to any advertising platforms, data brokers or information resellers. Under no circumstances can we share the information collected via the HealthKit to any third party, except if such third party is already providing you health services with your prior consent.

Advertisements

Sleep Z may permit, solicit or contract certain other companies to conduct advertising campaigns on the Service. The advertisements that you see when accessing the Service are redirected from the servers of those advertising companies and may be geographically or contextually targeted. Some advertisers may use cookies on your computer. The cookies enable them to collect information about sections and features that you have accessed, advertisements posted on those sites and the advertisements that you have viewed. In this manner advertisers try to customize advertisements to your preferences and for their own business purposes. The advertisers' use of cookies is subject to their own privacy policies and not to this Policy. You are encouraged to read carefully the advertisers' policies.

External hyperlinks posted on our Website

Our Website may include hyperlinks to websites which are independent from ours. By clicking on such hyperlinks, you leave our Website. Sleep Z does not exercise any control on the operation of these websites and the fact that they are listed on our Website does not incur Sleep Z liability in any manner. Any Personal Information you submit through these websites is subject to such websites' privacy policies.

Changes to the privacy policy

Sleep Z may modify this Policy once in a while. In the event of a modification, an appropriate notice will be posted at the beginning of this Policy. Please consult it from time to time.

Information

Should you have any questions regarding our Policy, the protection of Personal Information, to make an access or correction request, to exercise any applicable rights, to make a complaint, or to obtain information about our policies and practices with respect to any service providers outside India, our Privacy Officer (or Data Protection Officer) can be reached by mail at: sleepzapp@gmail.com.

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