

RNA 180 - Privacy Policy

Last Updated: September 5th, 2024

RNA 180 Inc. (“**RNA 180**”, “**we**”, “**us**”, “**our**”) has created this privacy policy (“**Privacy Policy**”) in order to set out how we collect, use, and disclose personal information through our website, <https://www.rna180.ca/> (“**Website**”), and dental hygiene management software (“**Platform**”). Platform and Website are collectively referred to as the “**Services**”. This Privacy Policy applies to users and customers of our Services (“**User**”, “**you**”, “**your**”).

We may change this Privacy Policy from time to time at our sole discretion. We encourage you to review this Privacy Policy each time you use the Services to see if the Privacy Policy has been changed, as indicated by the “Last Updated” date set out above. We may require you to provide consent to the updated Privacy Policy before further use of the Services is permitted. Use of Personal Information we collect is subject to the Privacy Policy in effect at the time such information is collected, used, or disclosed.

1. WHAT DOES THIS PRIVACY POLICY COVER

This Privacy Policy covers our collection, use and disclosure of information about identifiable individuals (“**Personal Information**”). This Privacy Policy does not apply to the practices of companies that we do not own or control, including any Third-Party Integrations or service providers we may engage in connection with the Services.

2. COLLECTION AND USE OF PERSONAL INFORMATION AND OTHER DATA

2.1. RNA 180 Account Information

To use the Platform, users must register for an RNA 180 account (“**Account**”). When you register an Account, RNA 180 collects your billing information and email to authenticate your Account access and provide you with access to the Platform. RNA 180 also uses your email address to communicate with you. RNA 180 will also collect your IP address, city, and province of residence to confirm that you are eligible to participate based on your location.

RNA 180 also uses Account information to communicate with you, provide you with updates and other information relating to the Services, and to otherwise provide customer support. We also use your contact information (collected during Account registration or via the Website) for marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable, or otherwise of interest to you, in all cases where you have subscribed to receive such information.

2.2. Third-Party Integrations

We may integrate with or rely on third-party platforms and services to provide the Platform to you ("**Third-Party Integrations**"). Any Personal Information submitted to us via Third-Party Integrations that we can access will be subject to this Privacy Policy, but please note that such Personal Information will also be subject to the terms of the applicable Third-Party Integration. Please consult the relevant third party's privacy policy to see how they process your Personal Information.

2.3. Information Shared with the Platform

To provide the Platform services, RNA 180 utilizes a Third-Party Integration with third party dental management systems used by dental offices ("**DMS**"). Patients of dental offices may disclose certain Personal Information to the dental offices, which will be uploaded to the DMS ("**Patient Information**"). The Platform accesses certain Patient Information which includes, first and last initials and date of birth, not directly from patients, but from the DMS. The Platform may also access patient treatment history, including performance parameters, which may include patient initials and date of birth.

RNA 180 may use Patient Information, in anonymized and aggregated form, to generate analytical information about the Services ("**Statistical Data**"). Statistical Data is used to create managerial performance measurements, performance baselines, and other related statistical analysis. Statistical Data does not contain Personal Information.

2.4. Information Shared via the Website

You may submit Personal Information to us when you contact us via the Website. We also provide links to our social media accounts on the Website, and you may choose to contact us there. Any Personal Information you submit to us via the Website or our social media accounts when you contact us will be processed in accordance with this Privacy Policy, but please note that the applicable social media platform may have access to your Personal Information. Please consult the relevant social media platform's privacy policy to see how they process your Personal Information.

2.5. Cookies and Device Information

When you use the Services, we may collect certain information through technologies such as cookies and other automatic data collection technologies ("**Cookies**"). We may use Cookies for authentication and to compile aggregate statistics about usage of the Services, such as how long Users spend using the Platform, and what parts or pages of the Website are viewed most often. This information is used to improve the content and operation of the Services.

You may opt out of Cookies or prevent third-party websites from accessing our Cookies by adjusting your privacy settings on your browser. However, opting out of Cookies may disable some features of the Services and may prevent us from providing you with the information and services you have requested.

When you use the Services, we may collect information about your device (“**Device Information**”). Some Device Information, such as unique device identifiers, may constitute Personal Information. The Personal Information we collect from Device Information can depend on the individual settings of the device you use to access the Services. We recommend checking the policies of the device manufacturer to learn about what Device Information may be shared with us. You may disable the sharing of Device Information, but doing so may disable some features of the Services and may prevent us from providing you with the information and services you have requested.

2.6. Other Uses with Your Consent.

We may use your Personal Information for other purposes not expressly listed in this Privacy Policy, for which we obtain your consent at the time the Personal Information is collected.

3. DISCLOSURE OF PERSONAL INFORMATION WITH THIRD PARTIES

3.1. Service Providers and Business Partners

We may from time to time share your Personal Information with third parties who we employ to perform tasks on our behalf and to provide the Services to you. This includes third party companies and individuals employed by us to facilitate our Services, including Third-Party Integrations, the provision of maintenance services, database management, payment processing, web analytics and general improvement of the Services.

We have put in place contractual and other organizational safeguards with such third parties to protect your Personal Information from unauthorized uses and disclosures. Such third parties have limited access to Personal Information solely for the purposes described herein, and they will be subject to contractual restrictions prohibiting them from using such Personal Information for any other purpose.

Our servers and those of third parties who may receive your Personal Information may be located outside of Canada. Accordingly, your Personal Information may be available to foreign governments or their agencies under a lawful order, irrespective of the safeguards we have put in place for the protection of your Personal Information.

3.2. Business Transfers

We may disclose your Personal information to third parties in connection with a corporate re-organization, a merger or amalgamation with another entity, or a sale of all or a substantial portion of our assets or shares, including any due diligence exercise carried out in relation to the same, provided that the Personal Information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the Personal Information.

3.3. Legal Reasons

We may disclose your Personal Information to third parties if we have reason to believe that disclosing this Personal Information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Users, or anyone else (including the rights or property of anyone else) that could be harmed by such activities, or if we believe in good faith that such disclosure is required by and in accordance with the law.

3.4. With Your Consent

If we need to use or disclose any Personal Information in a way not identified in this Privacy Policy, we will notify you and/or obtain your express consent as required under applicable privacy laws.

4. RETENTION AND DELETION

We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. All retained Personal Information will remain subject to the terms of this Privacy Policy. You may ask us to remove your Personal Information from our databases, and we will do so to the best of our ability, but it may not be possible to completely delete all your Personal Information due to technological and legal constraints (for example, when your Personal Information pertains to another User).

5. ACCESS AND ACCURACY

You may access the Personal Information we hold about you to verify accuracy of your Personal Information, to have a general account of our uses of your Personal Information, and to correct your Personal Information as appropriate. Upon receipt of your written request, we will provide you with a copy of your Personal Information and correct your Personal Information as required, although in certain limited circumstances, we may not be able to disclose or correct all relevant Personal Information (for example, where that Personal Information also pertains to another User). In such circumstances, we will provide reasons for the denial to you upon request. We will make every reasonable effort to keep your Personal Information accurate, and to respond to your requests in a timely manner.

6. DATA SECURITY

We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that you provide to us. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff and third parties as reasonably necessary to carry out the stated purposes we have communicated to you.

7. ADDITIONAL INFORMATION

If you want to enforce any of your rights under this Privacy Policy or if you have any questions regarding this Privacy Policy or your Personal Information, please contact our Privacy Officer per the information below:

Via Email:

Via Mail: