

# UNIVERSAL IBOGAINE – Website Privacy Policy

Last updated: December 23, 2021

Universal Ibogaine Inc. and its wholly owned subsidiaries (together referred to as “UI”) are committed to protecting the Personal Information collected, used and disclosed during the delivery of our services, the operation of our websites, and the activities of our ongoing business (together the “Services”). UI is subject to British Columbia’s Personal Information Protection Act which sets out rules for how organizations collect, use, and disclose Personal Information.

This Privacy Notice sets forth the privacy principles and procedures and safeguards we use to protect your Personal Information.

If you do not want UI to use or disclose your Personal Information in the way identified in this Privacy Notice, you should not use our Services.

## **Personal Information**

This Privacy Notice covers our collection, use, and disclosure of any information about identifiable individuals or that can be used to identify individuals (“Personal Information”).

We collect Personal Information directly from you when you engage our Services, contact us via mail or email, sign up for email alerts, or otherwise provide it when you use our Services. This information may include your name, email address, mailing address, and other information that you provide.

We indirectly collect names, email addresses and other business contact information about individuals who we consider to be prospective customers and business partners (“Prospects”) from publicly available sources and third party service providers. We use this information to contact Prospects about our products and services.

For information regarding data collection on our websites, see “Websites and Cookies” below.

UI will only collect, use, or disclose Personal Information that is necessary to fulfill the purpose of the collection.

## **Identifying Purposes**

UI uses Personal Information to:

Deliver requested products and services.

Respond to your requests for information.

Contact you for the purposes of product information, service updates, and notifications relating to the Services.

Manage investor relations.

Monitor system usage, server and software performance, to improve system design, to create benchmarks and to conduct trending analyses.

Perform statistical analyses and generate anonymized data (that does not identify you) related to the use of the Services.

Assist you with technical support issues. Most technical issues can be resolved without UI viewing your Personal Information.

Comply with any laws, regulations, court orders, subpoenas, or other legal process or investigation and to protect ourselves and other individuals from harm.

Bill, process and/or collect payment.

## **Consent**

UI will collect, use or disclose your Personal Information based on your consent, which may be explicit (e.g., where you must tick a box to indicate your consent) or implicit, where the reason for the collection is obvious and voluntary (e.g., for you to receive email alerts).

At any time and without penalty, you can withdraw your consent to the use and disclosure of your Personal Information as set out in this Privacy Notice by contacting us at [privacy@numinus.ca](mailto:privacy@numinus.ca) or, in the case of email alerts by clicking on the unsubscribe link found in the alert.

## **Disclosure**

UI will not sell, rent, trade or otherwise disclose your Personal Information to any third parties for any purpose other than those specified at the time of collection, unless we obtain your consent to do so.

Any third-party service providers we use to deliver the Services do not have the right to use the Personal Information we disclose to them beyond what is necessary for them to provide the tasks and services on our behalf.

UI may disclose Personal Information to comply with any laws, regulations, court orders, subpoenas, or other legal process or investigation and to protect us and other individuals from harm.

### **Location of Data**

UI uses service providers located in Canada and the United States. Your Personal Information may be transferred outside of Canada and may be subject to access by law enforcement in the United States.

### **Retention**

UI retains Personal Information only as long as necessary to fulfill the identified purpose or as permitted or required by law, which may extend beyond the termination of our relationship with you.

We may retain certain information as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally identifiable data, or if required by law. All retained Personal Information will remain subject to the terms of this Privacy Notice.

When we have no ongoing legitimate business need to retain your Personal Information, we will delete it, anonymize it, or securely store it until deletion is possible.

### **Individual Access and Accuracy**

You have the right to access the Personal Information we hold about you in order to verify your Personal Information. You may request access to, make corrections to, or delete the Personal Information we hold about you at any time, subject to limited exceptions. In some circumstances, we may not be able to comply with your request. If this is the case, we will provide reasons for not complying.

Upon written request, we will provide you with a list of entities (e.g. third party service providers) to which we have disclosed your Personal Information, if applicable.

### **Third Party Websites**

It's important to guard your privacy when you are online. If our Services contain links to other websites, this Privacy Notice does not govern those websites. Whether we have posted those links or other organizations, or individuals have, you should read their privacy notices and make an informed decision about whether you want to use those websites or services.

## **Data Subjects in the European Union**

UI generally processes Personal Information with an individual's consent, to fulfill contracts, and to pursue our legitimate business interests. Individuals located in the EU have certain rights under European law (including under the General Data Protection Regulation) with respect to Personal Information, including the right to request access to, obtain, correct, amend, delete, or limit the use of Personal Information. For more information or to exercise your rights related to your Personal Information, please contact our Privacy Officer at [info@universalibogaine.com](mailto:info@universalibogaine.com).

## **Security Measures**

We have taken reasonable technical and organizational security measures to protect Personal Information against unintentional or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and any other unlawful or unauthorized forms of processing under applicable law. We have implemented procedures designed to limit the access to your Personal Information to only staff who need it to perform their duties and to carry out the stated purposes. We use contracts to ensure that third parties acting on our behalf also maintain reasonable and appropriate safeguards.

Even so, it is important to remember that no system is absolutely secure or can be guaranteed 100% secure, not even ours.

## **UI and Children**

UI does not knowingly or intentionally collect Personal Information from visitors who are under the age of 18.

## **Websites and Cookies**

When you visit any of our websites, we collect information from you automatically. This includes the URL of the site you came from, your browser, your Internet Protocol (IP) address, date/time of access, data transferred, pages visited, amount of time on the websites, transactions conducted, and other "clickstream" data. This information is used to assist us in our marketing efforts, help diagnose technical problems, and to improve our websites.

We may also collect "de-identified data" from website visitors, in other words data that does not identify an individual, to:

Monitor system usage, server and software performance, to improve system design, to create benchmarks and to conduct trending analyses.

Perform statistical analyses and generate data related to how you use our website.

We use functional cookies on our website to deliver the desired functionality and user experience and analytics cookies to collect and analyze aggregate visitor behaviour. Cookies help us better understand how our websites are used and to improve them, as well as provide visitors the benefit of not having to re-enter the same data over and over again. You can disable cookies and still obtain access to most of our websites.

Information about website visitors may be collated and analyzed by third party services like Google Analytics, however we respect Do Not Track requests and website visitors can opt out of cookies and the use of analytics services.

### **Employment Information**

When you apply for a job with UI, we will collect Personal Information related to your application. In the event you are hired, we will collect information required to manage the employment relationship. Please contact our Privacy Officer for more information about the management of Employee Personal Information.

### **Changes to this Privacy Notice**

UI may amend this Privacy Notice from time to time. We will post the date of the most recent changes and provide previous versions upon request. If we make significant changes, we will provide a more prominent notice (including email notification, if appropriate).

### **Questions and Complaints**

When contacting UI regarding any issue, please do not include any Personal Information (other than your contact information) or health information in the subject line or in the content of your message. Note that email is not a secure method for transmitting information.

You may send your privacy-related questions, concerns or complaints to our Privacy Officer who is responsible for ensuring our compliance with this statement and privacy legislation.

Attention Universal Ibogaine:

Suite 1470, Devon Tower,

400 3<sup>rd</sup> Avenue SW,

Calgary, Alberta, T2P 4H2

T: 1-855-426-4246

E: [info@universalibogaine.com](mailto:info@universalibogaine.com)

UI will reply to complaints within 30 calendar days of receipt.

If our Privacy Officer is unable to resolve your concern, you may also contact the Office of the Privacy Commissioner of Canada.