HELIOSDX

HeliosDx Privacy Policy

Last Updated: November 26, 2026

Purpose and Scope

HeliosDX Longevity Diagnostics Inc. (“HeliosDx,” the “Company,” “Us,” or “We”) is dedicated to upholding the highest standards of privacy and protection regarding data and Personal Information in our care. We recognize our role as a trusted steward in the collection and management of sensitive health information related to our proactive health and longevity diagnostic services, including multi-cancer early detection, cardiovascular and vascular imaging, advanced bloodwork, and physician consultations. We value your right to receive full transparency in how we handle and process data and we are dedicated to building privacy into every aspect of our services and systems.

In this Policy, we explain how we collect, use, disclose, and protect information, ensuring that you are fully informed about your rights and the measures we take to uphold the privacy and security of your information. The principles outlined in this Policy are applicable during your entire relationship with us.

Whether by accessing this Website, requesting a consultation, submitting Personal Information to us of any kind, undergoing diagnostic tests or imaging, discussing your results with our medical team, or engaging with services provided by HeliosDx, you can be confident that your Personal Information is treated with the adequate protection afforded under Canadian law (including the Personal Information Protection and Electronic Documents Act), applicable provincial legislation (including Alberta’s Health Information Act and Personal Information Protection Act, and British Columbia’s Personal Information Protection Act), and this Policy.

HeliosDx further ensures that all of our business partners, third party affiliates, laboratory and imaging partners, and subsidiaries are aware when they have an obligation to act in accordance with either this Policy, their own similar policies, or other relevant HeliosDx policies. HeliosDx encourages the review of all HeliosDx’s affiliates and subsidiaries privacy policies, procedures, and website, mobile, or cloud service standards.

By accessing or using the Website or by otherwise giving us your Personal Information or Personal Health Information through our Services, you indicate that you understand, accept, and consent to the privacy practices described in this Policy.

Definitions

Personal Information

Personal Information is any information which relates to a natural person, allowing that person to be identified. All Personal Information is considered confidential information and must be handled in accordance with relevant legislation.

Personal Health Information

Personal health information is a form of Personal Information and includes all registration, diagnostic, treatment, health service, and care information, obtained in any format (oral or recorded) that allows an individual, living or deceased, to be identified either directly or indirectly. Personal health information is highly confidential information and can include, but is not limited to:

- Any information relating to the physical or mental health of the individual, including the health history of an individual's family and health risk factors.
- Any Personal Information that is contained in a file with health information is considered personal health information.
- Records of any form pertaining to any aspect of a health service program for the individual, including screening and test results, laboratory reports, imaging scans and reports, and diagnostic findings.
- Any material, biological or otherwise, taken from the individual, including blood samples collected for testing.
- Individual identifiers including a health card number, payments coverage, or substitute decision-makers.

Information Life Cycle

Information life cycle ("life cycle") refers to any aspect of the collection, use, storage, retention, transfer, disclosure, accuracy, correction, disposal, or destruction of Personal Information and personal health information.

Aggregated / De-Identified / Anonymized Information

"Aggregated" information is when your information is grouped with a collection of other information large enough that it is virtually impossible for you to be identified. Aggregated data is commonly referred to as statistical data.

Information is "de-identified" if it no longer allows the person concerned to be directly identified.

Information is “anonymized” if, at all times, reasonably foreseeable in the circumstances that it irreversibly no longer allows the person to be identified directly or indirectly. Steps must be taken in the case of both de-identified/anonymized data to follow best practices and to take reasonable steps to ensure no re-identification takes place. While HeliosDx respects and abides by each relevant jurisdictional definition of these terms, for the purposes of this Policy, Alberta’s definitions are utilized.

Profiling

“Profiling” is the use of technology allowing a person to be identified, located or profiled. “Profiling” means the collection and use of Personal Information to assess certain characteristics of a natural person, in particular for the purpose of analyzing that person’s health risk factors, program or screening eligibility, or medical history.

Collection and Consent

HeliosDx may only collect, use, or communicate your Personal Information and Personal Health Information with your consent. HeliosDx must ensure that the consent you provide is clear, free and informed, and given for specific purposes. Specific purposes are purposes necessary for HeliosDx to fulfil its mission, carry out our activities, provide you with our diagnostic and health services, conduct research to improve proactive and preventive care, or create new programs. Your consent must be sought for each specific purpose and presented in simple and plain language. Consent is only valid for the time necessary to achieve the purposes for which the consent was requested.

Your consent may be obtained, subject to legislative requirements, either implicitly or expressly. There are exceptions when consent is not required. HeliosDx will be transparent and demonstrate to you why such an exception may be invoked. You may withdraw your consent at any time, subject to legal and contractual restrictions and reasonable notice.

This Policy applies to information we collect, use, or disclose about our clients, prospective clients, visitors, and Website users as follows:

- On the Website (heliosdx.ca), including when you interact with us through consultation, booking, and newsletter sign-up forms;
- Through our diagnostic services, including blood test collection, laboratory analysis, medical imaging, physician consultations, and results delivery;
- Through our patient portal or results communication platform;
- In email, text and other electronic messages between you and HeliosDx;
- When you choose to participate in activities related to the Website, such as surveys, subscribing to our newsletter and marketing or promotional materials, you understand that

you are under no obligation to provide us with Personal Information; however, that may limit your ability to use certain functions or request certain services or information from us; and
- When you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this Policy.

For greater certainty, this Policy does not apply in the following circumstances:

- When you use our diagnostic services and input Personal Information, including Personal Health Information, we will ask for your express consent for us to collect, use and disclose such information for the purpose of providing you access to such services.
- Your use of our laboratory partner, imaging partner, or third-party testing facility services is subject to the terms of use and privacy policy of such platform or website to which you may be redirected. We encourage you to carefully read the terms of use and privacy policy of each platform prior to use or registration; and
- When you register for a patient account or results portal, you will be directed to our trusted service providers who have privacy policies HeliosDx has vetted to ensure the provider policies you agree to are substantially similar, but not subject to, this Privacy Policy or other HeliosDx policies.
- When you click on an icon or link on our Website to external sites, you will be redirected to external sites. The external sites that are not represented in this Policy's meaning of our "Website" are responsible for their own privacy policies. When you are redirected from our Website, this Privacy Policy is not in effect.

Information We Collect About You

When you use our Services or Website, we may collect Personal Information about you directly from you, including, but not limited to, surveys, search queries, or fillable forms you submit on the Website, or when you communicate with us through any medium.

The Personal Information that may be collected about you includes:

- Identifiers, such as name, initials, and date of birth;
- Contact information, such as your email address, phone number or residential address;
- Demographic information, including your gender, age, and ethnicity (as relevant to health risk assessment);
- Payment information, such as bank account numbers, credit cards, financing details, health insurance or health spending account information, etc.;
- Your areas of interest in our activities, programs, and services;
- Publicly available information, including Personal Information that appears in a publication such as a magazine or newspaper, where such collection is permitted by law;

- Personal Health Information, as defined in this policy, such as your medical records, personal and family health history, health card information, payment information, health insurance information, records of your tests, imaging, and the results you received, biological samples (blood), laboratory test results, health risk factors, and physician referral information; and
- Application information, if you choose to apply for a position at the Company, including the information contained in your resume and cover letter as well as any information you decide to share with us as part of the application process.

Additionally, we obtain certain information about you automatically when you use our Website, through automated technologies, including cookies or other tracking technologies deployed by our third party advertisers. This information includes:

- Technical information such as login information, hardware and software you use to interact with our Website, device identifiers, language, your mobile network information, the settings you use on our Website, your network location, and your IP address and location; and
- Website usage information such as searches conducted on the Website, the services you choose, links accessed, referring page, pages visited, and time spent on each page.

When HeliosDx collects your Personal Information, you will be informed of:

- The purposes, means, and right of access or rectification to the information collected; and
- Your rights pertaining to the withdrawal of your Personal Information.

and you have the right to further request:

- The Personal Information we have collected on you; and
- The categories of persons who have access to your Personal Information.

The information we collect automatically is used to help us improve our Website and to deliver better and more personalized services across HeliosDx. Our technological products are subject to HeliosDx's Confidentiality Policy and we ensure those product settings provide the highest level of confidentiality by default.

Information collected in the Province of British Columbia has the possibility of being held, communicated, or used outside of the Province of British Columbia. The collection of information in British Columbia that is subsequently held, communicated, or used outside British Columbia by HeliosDx, our business partners, third party affiliates, laboratory and imaging partners, or our subsidiaries is subject to mandatory Privacy Impact Assessments (PIA).

Each PIA will assess whether the information will receive “adequate protection” to that which it would receive if the data was maintained within British Columbia. Should such due diligence result in HeliosDx not being satisfied that the adequate protection standard is upheld, we must and will refuse to release the information.

How We Use Your Information

We may use your Personal Information for the following purposes:

- **Communication.** We use your identifiers and contact information to communicate with you, including providing notices for upcoming appointments, result notifications, provide you with information that you request from us, notify you of changes to our Website or services, respond to consultation requests, or keep you informed about Company activities. We also use aggregated demographic information to help us communicate more effectively;
- **Payment Processing.** We use your payment information to process payment, or arrange financing, for your programs, tests, and related services;
- **Delivering the Website.** We use technical information to present the Website and its contents to you, including interactive features, questionnaires, social media or similar features of the Website;
- **Delivering Care and Services.** We use your Personal Information to deliver our diagnostic services, laboratory testing, medical imaging, physician consultations, individualized reports, follow-up, results delivery, and administrative services;
- **Improving our Website.** We may use your Website usage information to improve our Website or services;
- **Improving our Services.** We may use your identifiers, demographic information, and areas of interest to improve our marketing, screening and assessment protocols, or customer relationships and experiences;
- **Analysis.** We may use your Personal Information for internal analysis to assist in the execution of HeliosDx’s strategic vision of providing accessible, physician-led proactive health and longevity diagnostic services;
- **Research Purposes.** We may use your Personal Information to generate de-identified, aggregated, or anonymized data. The de-identification/anonymization process will be conducted according to industry recognized best practices to minimize any risk of re-identification. We may then use and disclose these de-identified or anonymized data for research purposes, activities to improve the quality of screening and diagnostic care, advance early detection methodologies, or to evaluate our services, to the extent permitted by applicable laws and in compliance with the applicable privacy laws. We may also seek your interest and consent to participate in research projects and activities;

- **Strategic Data Utilization.** We may use your Personal Information to generate aggregated, de-identified, or anonymized data. The de-identification or anonymization process will be conducted according to industry recognized best practices with the goal of eliminating the risk of re-identification. We may then use, internally or with research partners, these transformed data to support the advancement of diagnostic and early detection technologies, to refine the services HeliosDx offers to you, or to contribute to the development and expansion of the ethical, responsible, and evidence-based application of artificial intelligence and machine learning technologies in preventive and diagnostic medicine;
- **Where Permitted or Required by Law.** We may use your Personal Information to meet legal requirements, carry out and enforce our rights, report to public health authorities as required, fulfill other purposes permitted or required by law.

HeliosDx shall inform you of any usage of your Personal Information that renders a decision regarding your care or services based exclusively on the automated processing of information. You have the right to submit observations regarding the automated processing decision.

Sharing of Your Information

Your Personal Information or Personal Health Information may be disclosed to physicians, specialists, radiologists, health care professionals, laboratory and imaging personnel, and staff directly involved in your care and services with your consent. In addition, the Company may disclose your Personal Information under the following circumstances:

- To laboratory partners, imaging facilities, and testing facilities necessary to perform your tests, scans, and analysis;
- To payment collection and financing service providers, where necessary to establish and collect payment;
- To healthcare providers you designate to receive your results;
- To detect, prevent or otherwise address fraud, security or technical issues;
- To facilitate a merger, acquisition, reorganization or sale of all or a portion of Company assets;
- When you have expressly consented to the disclosure;
- When your PI or PHI is fully transformed into anonymized data or is otherwise no longer considered Personal Information;
- To public health authorities as required by law for disease surveillance or outbreak investigation; or
- As required or authorized by law to do so without your consent.

We may also engage certain third-party service providers or agents to provide services to us, including information technology services, laboratory testing services, imaging services, and results delivery platforms. To the extent that these service providers have access to your Personal Information, they are obligated by us to protect your Personal Information to a level of security similar to that which we provide.

British Columbia Residents: Before sharing your Personal Information outside of British Columbia, HeliosDx is obligated to conduct a privacy impact assessment to ensure your information will receive adequate protection in the province or state in which the information will be shared.

All HeliosDx clients may contact our Privacy Officer at the contact information set out below in order to obtain written information about our policies and practices with respect to service providers and affiliates outside Canada, or to ask questions about the use, disclosure or storage of Personal Information by such service providers and affiliates outside Canada.

Securing Your Personal Information

It is HeliosDx's ethical and legal responsibility to ensure the adequate handling, protection, usage, retention, disposal, and safeguarding of all Personal Information and personal health information in its custody. HeliosDx's privacy governance program establishes an accountability framework encompassing the entire life cycle of data collected by us.

We have also established appropriate physical, technical, organizational, and administrative safeguards to protect the Personal Information we collect from or about our users, such as facility access control and workstation security. In addition, our patient information system uses passwords and firewalls to protect from inappropriate access, our patient portal accounts are password-protected and sensitive information is secured, whenever possible or practical, through encryption technologies. HeliosDx monitors, logs, notifies relevant authorities, and makes every effort to rectify any suspected or discovered compromise of information. We conduct privacy impact assessments, when required by law, for new projects and partnerships.

Biological samples (blood) are handled according to strict laboratory protocols and chain of custody procedures to ensure sample integrity and patient confidentiality throughout the testing process.

You understand that no method of communication of Personal Information, in-person or technological, can be guaranteed to be 100% secure. HeliosDx's information system safeguards, however, are structured with privacy by design as a central tenet to ensure we have taken all adequate and reasonable steps to protect your Personal Information.

If you have any questions about security or have reason to believe your interaction with us is no longer secure, we encourage you to notify us immediately at our contact information below.

Retention

We will retain your Personal Information to meet our contractual and care obligations to you, while any account you activate on or through the Website is operational, and for the length of time necessary to comply with our legal and ethical obligations, resolve disputes, and enforce our agreements. We retain Personal Health Information, including test results, imaging, and laboratory reports, for at least the minimum retention period required by applicable provincial medical regulators and laboratory and imaging accreditation standards. When the purposes of collecting your Personal Information is achieved, it will be securely destroyed, permanently anonymized, or de-identified as required or permitted by applicable privacy laws.

Exercising Your Data Protection Rights

Access and Rectification Rights

You have the right to know of the existence of the Personal Information we hold about you, the right to have that information communicated to you in a structured and intelligible format, the right to challenge the accuracy of the information about you, and the right to have inaccuracies rectified.

Please contact us at the contact information below (Contact Us) to request access to your Personal Information or change your preferences.

We will request documentation to confirm your identity prior to providing access to Personal Information, and we may not grant access in all circumstances (for example, where granting access would likely reveal the Personal Information of another party and the record is not severable). If the Personal Information is of a sensitive medical nature, we may grant access through a medical practitioner. If you have made a request and are not satisfied with our decision, you may submit a formal complaint to your relevant privacy commissioner, who may be able to review our decision.

Withdrawing Consent

Where you have provided your consent to us processing your Personal Information, you may have the legal right to withdraw your consent, subject to reasonable notice and certain restrictions. Certain personal health information cannot be withdrawn as it is essential for the provision of our services to you and may be required to be retained for legal or medical record-keeping purposes.

To withdraw your consent, if applicable, contact us at our contact information below. Please note that if you withdraw your consent, we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you with your decision.

Do Not Track

Some web browsers have a “Do Not Track” feature. This feature allows you to tell websites you visit that you do not want to have your online activity tracked over time and across websites. These features are not yet uniform across browsers. The Website is not currently set up to respond to those signals.

Other Rights

Depending on your jurisdiction, you may also have other rights, which can be exercised by contacting the relevant contact information set out below. These rights may include:

- The right to make a complaint to us;
- The right to make a complaint to a privacy commissioner;
- The right to request deletion of your Personal Information (subject to legal retention requirements for medical records);
- The right to opt out of marketing communications; and
- The right to request a portable copy of your Personal Information.

Links to Other Websites

The Website may include links to third-party websites or resources, or third-party information referencing or linking to third-party websites or resources. Clicking on those links or enabling those connections may allow the third party to collect or share information about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and the Company does not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

Messaging Terms & Conditions

You agree to receive informational messages (consultation follow-up, appointment reminders, result notifications, account notifications, etc.) from HeliosDx. Message frequency varies. Message and data rates may apply.

Consent & Opt-out Instructions

Mobile information will not be shared or sold to third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

If you wish to be removed from receiving future communications, you can opt out by texting STOP. Please note that opting out of promotional messages will not prevent you from receiving

critical health information related to your results.

Changes to this Privacy Policy

We reserve the right to change this Policy from time to time in our sole discretion. When we do, we will also revise the “last updated” date at the top of this Policy. We encourage you to periodically review this Policy in order to ensure that you are familiar with our data protection practices.

Contact Us

If you have questions about this Policy, wish to access or correct your information, or want to withdraw consent, please contact our Privacy Officer:

HeliosDX Longevity Diagnostics Inc. Attn: Privacy Officer Email: info@heliosdx.ca