MD.Learn - Privacy Policy

This is the privacy policy ("**Privacy Policy**") that governs how we, Edocate Ltd. ("**Edocate**", "**we**", "**our**" or "**us**"), use Personal Information (as defined below) that we collect, receive and store about individuals in connection with the use of (I) **MD.Learn** a competency-based medical training and education Service, offering simulated case-based scenarios, developed by Maccabi Healthcare Services ("**Maccabi**") as part of a web-based educational program, available to you through a mobile application (each individually, and collectively, the "**Software**"). The **MD.Learn** Services and the Software are individually and collectively referred to herein as the "**Services**".

PLEASE READ THIS PRIVACY POLICY CAREFULLY, AS IT DESCRIBES HOW WE COLLECT AND USE INFORMATION WE COLLECT ABOUT YOU ONLINE AND UNDER WHAT CIRCUMSTANCES WE SHARE INFORMATION ABOUT YOU.

1.   Introduction. We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the Services. "**Personal Information**" means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, professional experience or other contact information.

2.   Terms of Use. This Privacy Policy forms part of our Edocate End User Terms and Conditions which can be viewed from within the Services and which you must accept prior to downloading, installing and/or using the Software for the first time ("**Terms**"). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms unless specifically stated otherwise.

3.   Consent and Modification. By using the Services, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes and as set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Services. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective ten (10) days following posting of the revised Privacy Policy on the Services, and your continued use of the Services thereafter means that you accept those changes.

4.   What Personal Information We Collect and How We Collect It. If you visit the web-based application and/or use the Services, your Personal Data may be collected by us or on our behalf. Such Personal Information may be provided by you in each of the following ways:

4.1.   By Creating an Account through:

In order to use the Services, you will be required to create an account. In order to create an account, you may be required to provide accurate and complete information of your full name, e-mail, country of residency, type of medical degree and education, name of your workplace, the field of medical specialty, and the number of years in practice.

(a)   Mobile Application: You may choose to download a designated application for a mobile device (phone or tablet), under the name of **MD.Learn** in which you will be required to complete and submit an online registration form. You will be asked to provide us with certain mandatory information as stipulated above.

We may send an email to your designated email address to instruct you on how to confirm your registration.

NOTE – IF YOU CREATE AN ACCOUNT ON BEHALF OF ANOTHER PERSON, THUS PROVIDING US SUCH PERSON'S PERSONAL INFORMATION, YOU MUST DO SO ONLY WITH THAT PERSON'S EXPRESS AUTHORIZATION. YOU SHOULD INFORM THEM HOW WE COLLECT, USE, DISCLOSE AND RETAIN THEIR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY BEFORE YOU PROVIDE US WITH THEIR PERSONAL INFORMATION.

4.2.   By Using The Services. As detailed in the Terms, analysis data concerning your ongoing interaction with the simulation cases, your performance derived from your User Submission, your expertise

and knowledge in various fields of practice, and other characteristics which may be concluded from your User Submission.

4.3.   <u>By 'Contact Us' Information</u>. If you send us a "Contact Us" request, whether by submitting an online form that we make available or by sending an email to an email address that we display, you may be required to provide us with certain information, such as your name and email address.

4.4.   <u>Location Data</u>. We may provide certain location-based services ("**Location Services**") in connection with the Services that are dependent on data related to the geographic location of your mobile device on which the Software is installed ("**Location Data**"). If you choose to participate in these Location Services, you agree that we may collect or obtain your Location Data. You should be able to use the settings on your mobile device to turn off location-sharing features.

4.5.   <u>Cookies and Other Tracking Technologies</u>. While using the Services, "cookies", anonymous identifiers and other tracking technologies may be utilized in order to support the provision of the Services, offer a better browsing experience, analyze traffic and personalize content. A "cookie" is a small text file that may be used, for example, to collect information about activity on the Services. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

4.6.   <u>Mobile Device Data</u>. The Software collects limited information from your mobile device in order to provide the Services. Such information may include your mobile device type, mobile device id, and the date and time stamps of Software use. In addition, tracking technologies within the Software may be deployed to help gather aggregated information.

5.   **The Way Personal Information May be Used.** Personal Information gathered through any of the aforesaid ways may be used for:

5.1.   Providing and improving the Services, providing you with support and assistance in using the Services, soliciting feedback in connection with your use of the Services, contacting you in connection with the Services, identifying and authenticating your access to the parts of the Services that you are authorized to access, improving the user interface of our web site, web-based application or mobile application, and collecting aggregate data regarding web site visitations, the timing of sessions and etc.

5.2.   Your designated email address may be used by us and/or Maccabi to (i) send you updates or news regarding the Services; (ii) respond to a "Contact Us" or administrative request (for example, to reset your password if you have indicated that you are unable to remember your password); (iii) send you ads and related content and information for marketing or promotional purposes; (iv) send you a certificate of participation once you have successfully completed an MD.Learn Simulation ; (v) send you a feedback questionnaire.

5.3.   Unless specifically stated below, we will not transfer may transfer your Personal Information to the Maccabi. Nor shall we sell, rent, or lease any of the Personal Information collected as part of the Service to any third parties.

5.4.   We may share your Personal Information with our third-party service providers and partners, but only with the sole purpose of assisting us with our business operations and providing the Services. Such information may be transferred to other countries deemed by applicable law as providing adequate protection of personal data. We use commercially reasonable efforts to only engage or interact with third-party service providers and partners that post a privacy policy governing their processing of Personal Information. Personal Information gathered will be maintained, processed and stored by us and/or our third-party service providers and partners located in the United States.

5.5.   We may disclose your Personal Information or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms, including investigations of potential violations thereof and enforcing any rights and/or remedy available to us in case we have reason to believe that such violation has occurred; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of Edocate, Maccabi, our users, yourself or the public.

6.   Use of Anonymous Information. As detailed in the Terms, we may use Anonymous Information to create Impact Assessments for the purpose of better understanding changes in practice behavior and clinical skills. Such Impact Assessments will be issued anonymously without any reference to a specific user. We may use such Impact Assessments to third-party service providers in order to improve the Services and enhance your experience with the Services. Furthermore, Anonymous Information' such as web browser type may be collected while visiting our web-based application. "**Anonymous Information**" means information that does not enable identification of an individual user, such as aggregated information about the use of our Services.

7.   Opting Out. You may choose not to receive future promotional, advertising, or other Services-related emails from us by selecting an unsubscribe link at the bottom of each email that we send. Please note that even if you opt-out of receiving the foregoing emails, we may still send you a response to any "Contact Us" request as well as administrative emails (for example, in connection with a password reset request) that are necessary to facilitate your use of the Services.

8.   Choice. At all times, you may choose whether or not to provide or disclose Personal Information. If you choose not to provide mandatory Personal Information, you will be unable to access Services.

9.   Links to and Interaction with Third-Party Products. The Services may enable you to interact with or contain links to your third-party Account and other third-party websites, mobile software applications and services that are not owned or controlled by us (each a "**Third-Party Service**") such as Google Analytics, Sentry, Crashalytics, Instabug, Bugnsag, Bitly, etc. These Third-Party Services providers may have a direct contractual relationship with you. We are not responsible for the privacy practices or the content of these Third-Party Services. Please be aware that the Third-Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third-Party Service that you choose to use or interact with.

Children's Privacy. The Services are not structured to attract and are not intended for use by children under the age of 18 years. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 18 years. If we learn that we have collected Personal Information from a child under 13 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at support@edocate.com.

10.   Security. The security of Personal Information is important to us. We follow generally accepted industry standards, including the use of appropriate administrative, physical and technical safeguards, to protect the Personal Information submitted to us. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security or confidentiality. If you have any questions about the security of the Service, you can contact us via support@edocate.com.

11.   Commitment. We are committed to protecting your privacy. Protecting your privacy online is an evolving matter, and we are constantly evolving our Service to meet these demands. If you have any comments or questions regarding our Privacy Policy or your Personal Information that we may be storing and using, please contact us at support-mdlearn@edocate.com

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