

Kama.AI

Privacy Policy

Our Commitment to Privacy and Confidentiality

Kamazooie Development Corporation (operating as “Kama.AI”), through its websites at kama.ai, and its public service offering at KamaCARE.ai (collectively “our websites” and our “Service” or “Services”), is committed to protecting the confidentiality and privacy of the personal information and/or personal health information of its employees, Service users (customers of kama.ai), users of our websites, our shareholders, and board members, and any volunteer or employee facilitated services by 3rd parties (“3rd Party Services”), accessed or referred to, through our Services. Collectively, we refer to these persons as our “stakeholders”.

As part of our commitment to privacy, we have implemented this Privacy Policy (“Policy”) which outlines the responsibilities of kama.ai and its full/part time permanent or contracted employees, volunteers, contractors, consultants, temporary employees from agencies, and all personnel affiliated with the deployment of and service delivery of our Services; all of which are hereinafter referred to as associates.

Personal information and personal health information are highly sensitive, and are collected under implied consent through the use of our Services.

Scope and Kama.AI Related Services

This Policy sets out Kama.AI’s commitment to privacy. It governs all its Services and interactions with stakeholders: in-person, digital, online, or off-line. Kama.AI offers interactive, personalised digital experiences, information, referrals, and can support, by extension, additional digital, volunteer or employee facilitated 3rd Party Services, through text or voice-based media.

We also utilize automated language translation services, spelling and grammar correction services, and, voice-to-text and text to voice translation services, through contracted service providers.

Our Services, and associated information offered through our Services, can be provided to youth and adults of any age living in Canada and in other countries. To the best of our knowledge, we ensure that our Services comply with all applicable the laws in force in the Province of Ontario and the laws of Canada, without recourse to their rules on conflicts of laws, and, to the best of our knowledge, we also strive to meet the laws in other countries in which we may have customers using our Services.

Kama.AI’s main commercial website requires users to identify themselves by email address while our Service at kamaCARE.AI service does not require users to identify themselves. Having stated this, information collected by our service at kama.ai and kamaCARE.ai, through any supported voice or text medium, may, inadvertently, include identifying information.

Kama.AI deals with all information associated to people, or customers, or otherwise associated organizations, as private, privileged, and confidential. Kama.AI uses various industry standard and proprietary protection mechanisms, to govern all information under its custody and control.

Kama.AI hosts its Services with industry leading third party service providers that also maintain have and maintain various security and privacy practices which we are aware of and rely on. Information may also be stored on devices owned by associates. All associates agree to this Privacy Policy, to associated Terms and Conditions Agreement, and to Kama.AI security policies as required.

Kama.AI Privacy Policy

Accountability

Kama.AI is responsible for the personal information and personal health information under its control. We have appointed a Privacy Officer and created a Privacy, Security, and Risk Program to ensure compliance with The Personal Information Protection and Electronic Documents Act (PIPEDA). PIPEDA is the federal privacy law for private-sector organizations that sets out the ground rules for how businesses must handle personal information in the course of their commercial activity.

Purposes

Kama.AI collects personal information, and may inadvertently collect personal health information, to provide users with the above-mentioned services. In addition, Kama.AI will use the information for data quality and service delivery improvement, and may share row level data with research partners under appropriate non-disclosure agreements (NDA).

We will disclose aggregate level data for funding, sales and investment reports, thought leadership publications (including, but not limited to, our website), media publicity, conference presentations, and participating in approved research.

Information regarding donors (in-kind and monetary) or prospective donors to any social not-for-profit initiatives we may pursue from time to time, and partners (including those that assist in fundraising) is collected for: communications; requesting and managing donations; sending reminders, thank-you letters, and tax receipts; fundraising and gala events management; compliance; and for validating identity.

Other purposes of information collection and management include creating promotional material, writing of impact reports, formulating user experience stories, delivering motivational speaking presentations, and collecting feedback about these events.

Third Party Service provider, partner and external contractor data will be used for the purposes of managing our relationships with them.

Limiting Data Collection

Kama.AI will limit the collection of personal information, and personal health information, to the intended purposes covered by this policy.

Our KamaCARE.AI service does not ask users for their name (we may ask for location if needed), to provide users with automated conversation-based information dissemination or 3rd Party Services by associates. In the course of interaction, users may choose to provide information that is to some degree identifiable, such as their age, sex, gender, sexual orientation, or location. Kama.AI will treat all such user information as personal health information.

Kama.AI may collect, through its Services, demographic data including, location, personal values, ethnicity to enhance the specificity or prioritization of the information provided and measure our service commitment to diversity and inclusion.

Kama.AI may work with partners to collect donations for its kamaCARE service offering and/or other not-for-profit social services that we may undertake from time to time. Some partners collect donations on our behalf and may therefore collect donor information, amounts, addresses, and names.

Kama.AI will limit collection of associate information according to the associate's role and function.

Information collected by Kama.AI may be either personal information or personal health information, which are together referred to in this policy as "information."

Limiting Data Retention, Use, and Disclosure

Kama.AI is committed to the proper classification, secure retention, and timely and secure disposal of any record containing any information.

User information will not be disclosed except in accordance with Kama.AI's legal obligations to report to child services and policing agencies. In addition, Kama.AI will only release aggregate reports and data about its services to associated agencies or to major funders. Any disclosure of aggregate data must be deidentified to include at least 20 people in the data set, thus greatly reducing the potential of re-identification. Even though Kama.AI may share data in certain listed circumstances, we will not intentionally share data that is stigmatizing or puts any group or individual in a negative light. If we undertake research and publication work with the data collected, we will seek formal research ethics approval as per the [Canadian Tri-Council Policy Statement of Ethical Conduct for Research Involving Humans](#) (TCPS-2).

We may share row level data with research partners but only under NDA. We will disclose aggregate level data (deidentified to include at least 100 people in the data set) for funding reports, thought leadership publications, media publicity, conference presentations, and participating in approved research.

Donor information will only be disclosed for the purposes of validating identity and collecting donations. However, we may report back to donating partners the number of staff participating in events, and how much was raised at a fundraising event. We will not disclose information pertaining to donors who request anonymity.

We will limit the use of associate information to identity validation, managing payroll, capturing demographic information, next of kin, and emergency contacts.

Ensuring Accuracy

Kama.AI will ensure that appropriate reviews are executed system data integrity, will report any data integrity issues to the data quality team (which includes staff from business and information technology), and will correct all data integrity issues in a timely manner.

Where Kama.AI collects Donor information related to any not-for-profit social services such as kamaCARE, it may from time to time, to validate donor payment details and address information to ensure continuity of billing, and to provide tax receipts.

For conversational text, chat and voice Services, we ultimately store exchanges as text conversations between the end user and our platform(s) to ensure service quality, development enhancements, and for training purposes. Kama.AI relies on individuals providing accurate data; we will not ascertain its accuracy.

Safeguards

We follow industry standards to safeguard data against loss or theft, as well as unauthorized use, access, disclosure, copying, modification, retention, or disposal. We use a variety of physical, electronic, and procedural safeguards to protect all captured information.

Most user information is stored in Canada or the United States. Some companies providing services to Kama.AI are located outside of Canada (including the USA) and information may be stored in these jurisdictions. Under the laws of some countries (including the USA) information may be made available to the government, or its agencies, under a court order made in those countries.

Openness

Kama.AI publishes this Policy to include a plain-language description of our service intentions that is appropriate for sharing with individuals whose information is collected, including a general description of the safeguards in place to protect against loss, theft, unauthorized use, access, disclosure, copying, modification, or unauthorized or unsecured disposal, and to protect data integrity.

Upon request, Kama.AI may also provide to the public, any directives, guidelines, and policies that apply to its services.

Individual Access

Information shared over our Kama.AI website, or related interfaces, does ask for email address and a common name. Our service intention *visa vis* kama.ai and any related access medium, regarding interaction is for non-personal, commercial interaction regarding Kama.AI's products and services.

Information collected or shared *visa vis* KamaCARE.AI does not ask users for identifying information, providing access to such information is not feasible.

For donors to KamaCARE or other social not for profit initiatives that we may undertake, there clear accountabilities, to comply with applicable legislation allowing an individual to access their information. If such donations are solicited and taken, systems and documented processes will be put in place, with controls and audit trails, to respond to individual requests for data access as required by legislation.

Governance

In order to meet its obligations under privacy legislation, and to clients and funders, Kama.AI has:

- Created this Privacy Policy, and an associated Terms and Conditions Agreement, and
- assigned a Privacy Officer to ensure compliance with obligations related to privacy and security.
- Used or developed practices and procedures to:

- Develop key performance indicators to assess and report on privacy or security metrics.
- Review Kama.AI privacy and security policies, practices, and procedures, from time to time, to ensure that they comply with applicable legal, industry, and regulatory standards and requirements and to determine whether changes are necessary or appropriate based on changes in laws or significant legal or other developments.

The Privacy Officer will form an Incident Response Team to manage incident responses as, and if, required. The Privacy Officer may delegate responsibility to other employees or executives involved with the breach as well as other participants decided on by the Privacy Officer including but not limited to 3rd party contractors.

Human Resources

Kama.AI uses and develops practices and procedures to ensure that associates who perform services or otherwise have access to confidential information will:

- Sign a Non Disclosure or Confidentiality Agreement.
- Be informed of all privacy and security-related policies and procedures that are readily accessible to all personnel.

Training and Awareness

Kama.AI believes that a culture of privacy and security is necessary to meet the individual and collective responsibilities of the organization, and conducts ongoing privacy and security awareness discussions and initiatives to employees and associates as required.

- Training and awareness programs include specific guidance privacy and security responsibilities of employees and on detection of potential security hazards or privacy risks.
- Kama.AI supports a culture of continuous improvement in all areas including privacy and security. In addition to any new-hire or ongoing training, team meetings, design meetings and design processes always consider security and privacy an underlying responsibility of our company and our employees.
- Any issues that are identified as security and privacy risks or breaches are used as learning opportunities, to not only fix issues before they escalate, but also to broaden our understanding and responsibility for risk mitigation and resolution.

Policy and Procedure Auditing

Kama.AI reports on privacy and security initiatives, and any related incidents, at the quarterly meetings of its Board of Directors. Either Kama.AI senior management, or its Board of Directors, are authorized to request an audit of the company's security and privacy policies and procedures. Such a privacy and security assessment or audit will be performed no less than per calendar year.

Breach Response Protocol

Kama.AI affirms its ability to promptly and appropriately respond to, contain, and mitigate, the impact of a privacy or security breach or incident. Accordingly, Kama.AI has the responsibility to establish and maintain a Breach Response Protocol to identify, manage, and resolve privacy and security breaches. The Breach Response Protocol sets out our processes to respond to privacy and security breaches which occur as the result of loss, theft, unauthorized use, access, disclosure, copying,

modification, or unauthorized or unsecured disposal of collected information. This protocol is reviewed and enhanced with each breach occurrence.

The following Prevention Strategies will be followed to minimize the possibility of a breach, and to ensure preparedness in the event that a breach does occur.

Prevention Strategies

Security

- Take reasonable effort to ensure that all physical, logical, and IT controls are appropriate for the type of information collected and stored.
- Take reasonable effort to ensure that security patches and updates will be installed system-wide with software releases
- Limit locations where personal information and personal health information are collected and stored, consider if these locations should be encrypted and limit access control to this information whether encrypted or not.

System Evolution, Design and Control

- Where new features are added that will collect or manage personal information or personal health information are considered, they will be evaluated closely and designs will follow guidelines that minimize security and privacy risks.
- As new features are introduced, we will consider any impacts to our Privacy Policy, our Terms and Conditions Agreement, our Privacy and Security Risk Program and our Breach Response Protocol. Any enhancements to this documentation and related processes and procedures will be made accordingly. Any new processes that are required based on new features or information storage in our system(s) will be implemented prior to the rollout of such features.

Third-Party Vendors

Kama.ai extends the responsibility of security and privacy into its review and establishment of all contracts with 3rd parties that it does business with to ensure, to the best of its ability that such parties have appropriate physical, logical, and IT and security controls.

Complaint Management

Kama.AI responds to privacy and policy complaints within twenty-eight calendar days of initial receipt. The public is asked to send their privacy-related complaints to inquiries@kama.ai.

Donors supporting any not-for-profit social initiatives that kama.ai undertakes from time to time can send complaints or requests for changes via email to inquiries@kama.ai or through the online form at Contact Us forms on our websites.

Operating Procedures

Kama.AI has practices and procedures in place to ensure that it meets all provincial and federal privacy regulations. The Privacy, Security, and Risk Program at Kama.AI documents and administers and manages privacy, security, and risk processes.

Web Tracking Disclosure Statement

Using Google Analytics

We may use Google Analytics to collect information about the use of our websites. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve our sites. Google Analytics collects only the IP address assigned to users the date they visit the site, rather than a name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about visits to our sites is restricted by the [Opens in a new tabGoogle Analytics Terms of Use](#) and the [Opens in a new tabGoogle Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this site by [Opens in a new tabdisabling cookies](#) on your browser.

Google Analytics employs cookies to define user sessions, which allows for the collection of data about how visitors are using websites. Google Analytics uses only first-party cookies for data analysis. This means that the cookies are linked to a specific website domain, and Google Analytics will only use that cookie data for statistical analysis related to your browsing behaviour on that specific website. According to Google, the data collected cannot be altered or retrieved by services from other domains.

If you choose, you can opt out by turning off cookies in the preferences settings in your web browser. For more information on Google Analytics, please visit [Opens in a new tabGoogle Analytics](#).

Google Analytics Cookie Usage on Websites

[Opens in a new tabhttps://developers.google.com/analytics/devguides/collection/gajs/cookie-usage](https://developers.google.com/analytics/devguides/collection/gajs/cookie-usage)

Your Web Consent

By communicating with us through our websites at kama.ai and kamaCARE.ai, you are providing us, our associates or partners, or other third parties (e.g., Google Analytics) with information, and are thus consenting to the collection, use, and disclosure of your information in accordance with this Privacy Policy. The terms of use of the website are posted in our Terms and Conditions Agreement.

If you have questions about your Personal Data

If you want to view your personal information or personal health information, or have any concerns about the way in which your personal data is used or disclosed, please contact the Kama.AI Privacy Officer at inquiries@kama.ai

Privacy Policy Revision Date

This Policy was last revised on November 29, 2021.