

## Our Privacy Commitment

Inizio is committed to protecting the rights and freedoms of individuals whose personal information we collect, process, and control. We do so by ensuring that our businesses, employees, and those that work with us operate and act in accordance with relevant personal data laws and regulations.

## Our Policy & Its Foundation

The European Union's General Data Protection Regulation ("GDPR") and associated legislation are the foundation of this policy. Inizio's global personal data protection standards and processes are based upon and aligned with the requirements established under GDPR. We additionally utilise guidelines from other European bodies such as the European Commission, the European Data Protection Board, and Member State competent authorities to inform how we design and implement our global personal data controls.

## Additional requirements and local-level obligations

In doing so, we recognize the importance and applicability of privacy laws in all jurisdictions where we operate or whose

inhabitants we process and/or control the personal data of (as applicable).

Though we base our global privacy controls on GDPR, additional local-level obligations may also be relevant to Inizio businesses. If a conflict arises, local legal obligations always take precedence over Inizio's global personal data protection controls.

## Scope of this policy

Inizio's Data Protection Policy applies and pertains to:

- All of our locations, businesses, affiliates, and ventures where we hold a controlling interest; and
- All Inizio employees, contingent workers, contractors, or anyone who is engaged in activities where they are acting on behalf of the group.

More specifically, this policy applies to the Inizio functions who regularly engage in personal data processing activities, including those performed on customer and supplier-provided personal data, employee data, and personal data processed from other sources.

## Our Framework

The Inizio privacy framework is designed to achieve the following personal data processing principles:

- Lawfulness, fairness, and transparency,
- Purpose limitation,
- Data minimisation,
- Accuracy,
- Storage limitation,
- Integrity and confidentiality (security), and
- Accountability

While we strive to uphold the following rights of our data subjects:

- The right to be informed,
- The right of access,
- The right of rectification,
- The right of erasure,
- The right to restrict processing,
- The right to data portability,
- The right to object, and
- Rights in relation to profiling and automated decision making.

## Our Employees & Those Who Work With Us

Compliance with personal data protection requirements is the responsibility of all employees, contingent workers, and contractors who process personal data on behalf of Inizio.

Those processing personal data as they work with us should ensure that:

- All personal data is kept securely,
- No personal data is disclosed either verbally or in writing, accidentally or otherwise, to any unauthorised third party,
- They familiarise themselves with our applicable privacy notices,
- Ensure that any personal data they provide to Inizio is accurate and up to date,
- Personal data is kept in accordance with the applicable Inizio data retention processes, and
- Queries regarding personal data protection, data subject access requests or complaints, and potential or actual personal data loss incidents are promptly directed to [privacy@inizio.health](mailto:privacy@inizio.health)

## Our Third Party Partners

When Inizio utilises third parties for processing activities, responsibility for the security and appropriate use of that data remains with us, therefore we must ensure:

- A third-party processor is only selected if they can provide sufficient guarantees about their own personal data protection security measures,
- Reasonable steps are taken to confirm such security measures are in-place (specifically, all suppliers to whom we transfer personal data must confirm in writing that they meet GDPR criteria), and
- A GDPR-compliant written agreement establishing what personal data will be processed for what purpose, is entered into.

This policy, together with supportive internal processes and our Codes and Commitments form Inizio's privacy framework. Please contact [privacy@inizio.health](mailto:privacy@inizio.health) with any questions pertaining to the specifics of this policy or our framework.