



BLUENOSE HEALTH

PRIMARY CARE CLINIC

Bluenose Health Inc. Privacy Policy

At Bluenose Health Inc., we are committed to protecting your privacy. This Privacy Policy lets you (the “Licensee”) know when and how Bluenose Health Inc. uses, collects, discloses or processes yours and your patients’ personal information when you use our products and services or visit the Bluenose Health website <https://bluenosehealth.com> (“Website”). To that end, we have outlined below our Ten Privacy Principles based on the Privacy Principles established in Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA) and Nova Scotia’s Personal Information International Disclosure Protection Act (PIIDDA) respecting the protection of personal information in the private sector (APPIPS).

Bluenose Health Inc. Ten Privacy Principles

Personal information is information that can be used to identify or contact you individually, and other information that Bluenose Health Inc. needs to provide you with the products and services you have requested. Personal information we collect typically includes your name, NS health card number, email address, mailing address, telephone number, fax number and credit card or payment information.

Principle 1 – Accountability

Bluenose Health Inc. is responsible for personal information under its control. Bluenose Health Inc. has a Clinic Manager who is accountable for its compliance with our Privacy Policy, PIPEDA and PIIDDA. Bluenose Health Inc. Clinic Manager is accountable for our compliance with PIPEDA, and PIIDDA but other individuals at Bluenose Health Inc. may be responsible for day-to-day collection and processing of personal information and may also be delegated to act on behalf of the Clinic Manager.

Principle 2 – Identifying Purposes

You have a right to know how your information will be used. Bluenose Health Inc. will explain why we need your information before or when we collect it, if the purpose is not already clear. We will assume that the purpose is clearly identified when we use your personal information to:

HALIFAX

6140 Young Street, Unit 70, Halifax, NS B3K 0G2
phone +1 902 707 5404 / **fax** +1 902 482-3491
contact@bluenosehealth.com

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- Provide you with the products or services you have requested;
- Process your payment, including recurring payments as you request;
- Communicate with you about the products or services you have requested;
- Ensure that you are properly registered to use our products and services and to receive any associated technical support; and
- Inform you of any important product revisions or updates.

Bluenose Health Inc. may also use your personal information for secondary purposes such as:

- Letting you know about new or upgraded Bluenose Health Inc. products and services; and
- Inviting you to participate in patient surveys or other opinion-gathering devices.

Aggregate data is general information about groups of Licensees, and does not identify individuals. Bluenose Health Inc. may combine your information with that of other Licensees to generate aggregate data that can be used to improve our products and services or develop new ones. For example, we may tell a third party how many Licensees have subscribed to a particular service, but not identify that you personally are a subscriber.

Bluenose Health Inc. will not disclose your personal information to any third parties without your consent, except under the following limited circumstances:

- As is reasonably required to fulfill your service or product requirements, provided such third parties shall be bound to appropriate privacy requirements;
- To comply with a legal process such as a law, regulation, search warrant, subpoena, court order or law enforcement request
- To resolve a contractual dispute regarding you and/or a patient's use of any Bluenose Health Inc. product or service;
- To resolve issues related to the use of your account for illegal activities; or
- To protect the personal safety of other users or members of the public in an emergency.

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Principle 3 – Consent

Bluenose Health Inc. will collect, use and disclose your personal information only with your knowledge and consent, except where permitted or as required by law or defined in this Privacy Policy. We will not rent, sell, or otherwise distribute your personal information without your permission, unless otherwise defined in this Privacy Policy. Bluenose Health Inc. will seek consent when the information is likely to be considered sensitive.

You control any future secondary use of your personal information, such as sharing it with marketers. You can prevent future secondary use of your information by “opting out” when Bluenose Health Inc. collects your information or at any time by simply contacting us. Opting out only applies to the secondary purposes because we may need to contact you regarding the usability of our services or notify you of important product revisions or updates.

Principle 4 – Limiting Collection

Bluenose Health Inc. will collect personal information only for the purposes we’ve identified or for the primary uses described above. We shall collect information by fair and lawful means only. We will collect personal information in the following circumstances:

- When you subscribe to use our services, whether free or through a paid subscription;
- When you provide payment information for use with a paid subscription;
- When you contact Bluenose Health Inc. to request information;
- When we are provided such information from a third party who you authorized to share such information.

We will mark as optional any question we ask that seeks information that is not necessary to provide you with the Bluenose Health Inc. product or service you request. Bluenose Health Inc. uses "cookies" to collect information and improve our products and services. A cookie is a small data file that is stored on your device. Cookies cannot be used to see any other data on your computer, nor can they determine your e-mail address or identity. We may use "persistent cookies" to save your registration ID and

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login password for future logins to our service. We may use "session cookies" to enable certain features of our service, to better understand how you interact with our service and to monitor aggregate usage and web traffic routing on our service. You can change your browser options to stop accepting cookies or to prompt for your permission before accepting cookies. Choosing to decline cookies may affect your access to our products and services.

Principle 5 - Limiting Use, Disclosure, and Retention

Bluenose Health Inc. will not use or disclose your personal information other than for the purposes for which it was collected unless we receive your consent or unless we are required or permitted to by law. The content of the files stored on our service is encrypted and only you can decrypt it. When providing information in response to a legal inquiry or order, we will verify its validity and disclose only the information that is legally required. Bluenose Health Inc. will make reasonable efforts, within the bounds of the law, to notify you should your personal information be subject to disclosure. Bluenose Health Inc. will follow internally set guidelines and use reasonable care in the disposal, destruction, or de-identification of personal information to prevent unauthorized parties from gaining access to such information.

Principle 6 - Accuracy

Bluenose Health Inc. will maintain accurate, complete and up-to-date personal information as required for the identified purposes associated with its collection. Please let Bluenose Health Inc. know if your contact or other personal information changes. To update your personal information, please go to www.bluenosehealth.com and log into your account.

Principle 7 - Safeguards

Bluenose Health Inc. protects the personal information in our possession and control by using security safeguards appropriate to the sensitivity of the information. We work to protect personal information from loss, misuse and unauthorized alteration using industry-recognized security safeguards. We restrict internal access to personal

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information to select members of our team. When you use our service, Bluenose Health Inc. asks for the creation of a password. You will need your password to access any files stored on our service.

We will maintain a record of every breach of security safeguards involving personal information under our control. We will notify you of any breach of our security safeguards involving your personal information if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to you and/or your patients.

Principle 8 – Openness

This Privacy Policy is an overview of information about our policies and practices relating to the management of personal information. Should we change any of our privacy practices, we will post such change in this Privacy Policy for 30 days before it goes into effect. We will not retroactively change the practices associated with your personal information without your consent. The intention of this Privacy Policy is to answer your questions about our privacy policies and practices. Should you be interested in more detailed information about our procedures and practices, please contact our Clinic Manager at contact@bluenosehealth.com. When you email Bluenose Health Inc. a request or concern, the Clinic Manager will review your email and will respond within a reasonable period of time that should not exceed thirty (30) days.

Principle 9 – Individual Access

Upon your written request, and subject to exceptions as permitted or mandated by law, Bluenose Health Inc. will inform you of the existence, use and disclosure of your personal information and will give you access to the information. You may challenge the accuracy and completeness of your information and have it amended as appropriate.

Principle 10 – Challenging Compliance

Bluenose Health Inc. maintains procedures for addressing and responding to all inquiries or complaints from its customers about Bluenose Health Inc. handling of

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personal information. We will inform individuals who make inquiries or lodge complaints of the existence of relevant complaint procedures. Our Clinic Manager and staff working at the Officer's direction may seek external advice where appropriate before providing a final response to individual complaints. Bluenose Health Inc. shall investigate all complaints.

If a complaint is found to be justified, we will take appropriate measures, including, if necessary, amending its policies and procedures.

Principle 11 – Analytics

We may use third-party Service providers to monitor and analyze the use of our Service. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page.

For More Information

We appreciate hearing any comments, questions or concerns that you may have about our policies, practices and customer service. Please contact our clinic at contact@bluenosehealth.com.

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