

Policy of Confidentiality



MAKING HEALTHCARE SAFER
SOINS DE SANTÉ PLUS SÉCURITAIRES

Policy on the Confidentiality of
Personal Information - Quebec

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Objectives and Scope

OBJECTIVES

This Privacy Policy (the “**Policy**”) sets out Daniels Corporation Canada practices regarding the collection, use and disclosure of Personal Information. For ease of reference, we refer to Daniels Corporation Canada as “Daniels Health”, “we” or “us”.

The primary objectives of this Policy are to:

- ▶ **Ensure Compliance** - Comply with the Act respecting the protection of personal information in the private sector of the province of Quebec (the “Privacy Act”) and other relevant privacy laws and regulations.
- ▶ **Protect Personal Information** - Safeguard the confidentiality, integrity, and availability of Personal Information collected, stored, and processed by Daniels Health.
- ▶ **Promote Transparency** - Provide clear and accessible information to individuals about how their Personal Information is collected, used, and shared.
- ▶ **Foster Trust** - Build and maintain trust with clients, employees, and other stakeholders by demonstrating a strong commitment to protecting Personal Information.
- ▶ **Enhance Accountability** - Establish clear roles and responsibilities for the management and protection of Personal Information within Daniels Health.
- ▶ **Support Business Operations** - Ensure that the handling of Personal Information supports the efficient and effective operation of Daniels Health’s business activities.
- ▶ **Continuous Improvement** - Regularly review and update this Policy to reflect changes in laws, regulations, and best practices.

SCOPE

This Policy applies to all Personal Information collected, used, stored, and disclosed by Daniels Health, regardless of the medium or format in which it is held.

It covers the following:

- ▶ **Applicability** - This Policy applies to all employees, contractors, consultants, and third parties who handle Personal Information on behalf of Daniels Health. It encompasses all business units, departments, and operations within Daniels Health.
- ▶ **Personal Information** - The Policy covers all types of Personal Information as defined in the Privacy Act, including but not limited to identification information, work-related information, premises security information, and biometric data.
- ▶ **Geographical Scope** - This Policy is applicable to all operations within the province of Quebec and any international transfers of Personal Information.
- ▶ **Activities Covered** - The collection, use, storage, processing, disclosure, and disposal of Personal Information. All activities related to the management of Personal Information, including data collection methods, data sharing practices, and data protection measures.
- ▶ **Compliance** - Ensures compliance with the Act respecting the protection of personal information in the private sector of the province of Quebec and other relevant privacy laws and regulations. Includes adherence to internal policies and procedures designed to protect Personal Information.
- ▶ **Updates and Revisions** - This Policy will be reviewed and updated regularly to reflect changes in laws, regulations, and best practices. Employees and stakeholders will be informed of any significant changes to the Policy.

Terminology Used

THE TERMINOLOGY USED IN THIS PRIVACY POLICY

► **“Personal Information”**

Any information relating to an identifiable natural person who can be identified directly or indirectly. This includes information such as your name, email address, and contact details. Personal Information concerning the performance of duties within an enterprise by the person concerned, such as the person's name, title and duties, as well as the address, email address, and telephone number of the person's place of work, are considered public information by the Privacy Act and do not apply to this Privacy Policy.

► **“Request for Access to Personal Information”**

A request where you can ask us to provide you with a copy of the Personal Information we hold about you (Right of Access).

► **“Confidentiality Incident”**

For the purpose of this Privacy Policy, a confidentiality incident means -

1. Access not authorized by law to Personal Information.
2. A use not authorized by law of Personal Information.
3. A communication not authorized by law of Personal Information.
4. The loss of Personal Information or any other breach of the protection of such information.

► **“Data Controller”**

The person who controls the purpose for which Personal Information within Daniels Health is used.

► **“Processing of Personal Information”**

Any operation or set of operations that is performed upon Personal Information or sets of Personal Information, whether automated or not, including collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, or dissemination.

► **“Data Subject”**

The individual to whom the Personal Information relates.

► **“Third Party”**

Any person or organization other than the Data Subject, Data Controller, or Data Processor who is authorized to process Personal Information.

► **“Consent”**

Any freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of Personal Information relating to them.

► **“Data Breach”**

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information transmitted, stored, or otherwise processed.

Types and Collection of Information

THE TYPES OF PERSONAL INFORMATION WE COLLECT

We collect various types of Personal Information to fulfill our business operations and comply with legal requirements.

The categories of Personal Information we collect include:

- ▶ **Identification Information** - First name, last name, pronouns, email address, telephone number, date of birth, and government-issued identification numbers (e.g., Social Security Number, driver's license number).
- ▶ **Contact Information** - Home address, mailing address, email address, and phone numbers.
- ▶ **Employment Information** - Resume/CV, cover letter, employment references, job title, department, work history, and performance evaluations.
- ▶ **Financial Information** - Bank account details, credit card information, tax identification numbers, and salary details.
- ▶ **Health Information** - Medical history, health insurance information, and disability status.
- ▶ **Biometric Data** - Fingerprints, facial recognition data, and voice prints.
- ▶ **Usage Data** - Information about how you use our services, including browsing history, search queries, and interaction with our website and applications.
- ▶ **Communication Data** - Records of communications with us, including emails, phone calls, and chat logs.
- ▶ **Location Data** - GPS data, IP address, and location information from mobile devices.
- ▶ **Security Information** - Sign-in details, CCTV footage, and access logs.
- ▶ **Driver Information** - Information on our drivers' driving activities, such as speed, itineraries, road behavior, and accident reports.
- ▶ **Marketing and Survey Information** - Responses to surveys, preferences, and interests.
- ▶ **Cookies and Tracking Technologies** - Information collected through cookies, pixels, tags, and web beacons, including IP address, browser type, device information, and language preferences.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect and process your Personal Information directly from you when you:

- ▶ Contact us via our website, telephone, email or fax;
- ▶ Respond to a survey to capture service performance;
- ▶ Participate to our events or seminars;
- ▶ Visit our premises;
- ▶ Apply for a role at Daniels Health;
- ▶ Subscribe to our mailing list.

We may also receive Personal Information from third parties, including credit reporting agencies. If we do, we will protect your Personal Information in accordance with this Privacy Policy.

How We Use Your Information

HOW WE USE YOUR PERSONAL INFORMATION

We use your Personal Information for various purposes to operate our business effectively and comply with legal requirements.

The specific uses include:

- ▶ **Communication** - Allow relevant Daniels Health staff to contact you and identify your needs to meet your request. This includes responding to inquiries, providing customer support, and sending important notices.
- ▶ **Service Provision** - Process your application for our mailing list and send you relevant emails. This includes delivering products and services you have requested, managing your subscriptions, and providing updates on our offerings.
- ▶ **Business Administration** - Administer and manage your business relationship with Daniels Health. This includes maintaining records of your interactions with us, processing payments, and managing contracts.
- ▶ **Service Improvement** - Analyze your answers and preferences to develop and grow our services and offerings. This includes conducting surveys, research, and analysis to improve our products and services.
- ▶ **Security and Safety** - Ensure the security and physical integrity of our premises, equipment, and infrastructure. This includes monitoring access to our facilities, using CCTV for security purposes, and implementing safety protocols.
- ▶ **Compliance and Legal Obligations** - Protect employees and Daniels Health from fraudulent claims and meet legal, regulatory, and compliance obligations. This includes complying with laws and regulations, responding to legal requests, and maintaining records for audit purposes.
- ▶ **Marketing and Promotions** - Provide marketing and survey material to you (either by electronic means or post). This includes sending promotional offers, newsletters, and information about events and seminars.
- ▶ **Risk Management** - Reduce the risk of collisions and injuries, reduce litigation and claims costs, as well as fuel and vehicle maintenance costs by encouraging safer driving habits. This includes monitoring driver behavior and implementing safety measures.
- ▶ **Customization and Personalization** - Allow you to be directed to the version of our website and policies that applies to your region. This includes personalizing your experience on our website and tailoring content to your preferences.
- ▶ **Fraud Prevention** - Protect against, identify, and prevent fraud and other unlawful activity. This includes monitoring transactions and verifying identities.
- ▶ **Employee Management** - Manage employee records, performance evaluations, and compliance with employment laws. This includes processing payroll, benefits, and other HR-related activities.
- ▶ **Data Analytics** - Use data analytics to improve our website, products/services, marketing, customer relationships, and experiences. This includes analyzing website usage and customer feedback.

Securely Sharing Information

SHARING YOUR PERSONAL INFORMATION WITH THIRD PARTIES

We may share your Personal Information with third parties for various purposes, ensuring that it is handled securely and in accordance with this Privacy Policy.

The specific ways in which we share your Personal Information include:

- ▶ **Third-Party Service Providers** - We share Personal Information with third-party service providers that securely hold your Personal Information to support our business operations. This includes IT service providers, cloud storage providers, and payment processors.
- ▶ **Marketing and Survey Partners** - To provide marketing and survey material to you (either by electronic means or post). This includes sharing your contact information with marketing agencies and survey companies to send you promotional offers and gather feedback.
- ▶ **Logistics and Service Providers** - Third-party service providers for logistics or services. This includes sharing your information with delivery companies and service providers to fulfill orders and provide services.
- ▶ **External HR Specialists** - External HR specialists, including reference and DBS-related checks. This includes sharing your employment information with HR consultants and background check agencies.
- ▶ **Regulators and Law Enforcement Agencies** - We may share your Personal Information with regulators and law enforcement agencies to comply with legal obligations and respond to lawful requests.
- ▶ **Legal Representatives** - With our legal representatives. This includes sharing your information with lawyers and legal advisors for the purpose of obtaining legal advice or defending legal claims.
- ▶ **Business Partners and Affiliates** - Any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy. This includes sharing information with business partners and affiliates to support joint business activities.
- ▶ **Change of Control** - If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer, to the extent permissible at law, our subscriber databases, along with any Personal Information and non-personal Information contained in those databases.

Practices regarding the disclosure of your Personal Information to third parties:

- ▶ **Purpose Limitation** - We will only process and share your Personal Information with third parties for the purposes described in this Privacy Policy.
- ▶ **Confidentiality and Security** - When we disclose your Personal Information to third parties, we do so on the basis that your data is treated with confidence and only used for the limited purpose of providing support for our business activities, in a manner consistent with this Privacy Policy.
- ▶ **Documented Instructions** - When we use third parties to process your Personal Information on our behalf, we ensure that the Personal Information Processing is pursuant to our documented instructions and in accordance with the legal basis for the processing.
- ▶ **Compliance and Security Measures** - We only employ third parties that are compliant and have sufficient security measures in place to protect and safeguard your Personal Information.
- ▶ **Notification of Changes** - If there is a change of control in our business or a sale or transfer of business assets, we will notify you and provide you with the option to opt-out of the transfer of your Personal Information.

Securely Transferring Information

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We may store, process, and transfer your Personal Information outside of Quebec, including to countries that may not have the same level of data protection laws as your jurisdiction.

To ensure that your Personal Information is adequately protected during transfers, we implement the following measures:

- ▶ **Written Agreements** - We enter into written agreements with recipients of your Personal Information, detailing their obligations to protect and use your Personal Information responsibly. These agreements include standard contractual clauses approved by relevant data protection authorities.
- ▶ **Informed Consent** - We inform you about these transfers and obtain your consent when necessary. This ensures that you are aware of where your Personal Information is being transferred and how it will be protected.
- ▶ **Compliance Audits** - We audit compliance with our data protection policies and the terms of our agreements with third parties. This includes regular reviews and assessments to ensure ongoing compliance with data protection standards.
- ▶ **Data Breach Notification** - We require prompt notification of any data breaches involving your Personal Information. This allows us to take immediate action to mitigate any potential harm and notify affected individuals and regulatory authorities as required.
- ▶ **Security Measures** - We implement robust security measures to protect your Personal Information during international transfers. This includes encryption, access controls, and secure data transmission protocols.

HOW WE SECURE YOUR PERSONAL INFORMATION

We are committed to ensuring that the data you provide to us is secure. To prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data and protect it from misuse, interference, loss and unauthorized access, modification and disclosure.

These include but are not limited to:

- ▶ **Technical Measures**
 - Encryption* - Data is encrypted both in transit and at rest using advanced encryption standards to protect it from unauthorized access.
 - Access Controls* - We employ strict access controls, ensuring only authorized personnel with multi-factor authentication and role-based access control can access your data.
 - Regular Security Audits* - Frequent security audits and vulnerability assessments are conducted to identify and mitigate potential risks.
- ▶ **Cloud-Specific Measures**
 - Cloud Provider Security* - We partner with cloud providers that comply with international security standards, such as ISO/IEC 27001 and SOC 2.
 - Automated Backups* - Regular automated backups are performed to ensure data integrity and availability in case of any data loss incidents.
 - Threat Detection* - We utilize advanced threat detection and monitoring tools to identify and respond to potential security incidents in real time.
- ▶ **Organizational Measures**
 - Data Protection Policies* - Our comprehensive data protection policies ensure consistent handling and protection of your data.
 - Employee Training* - Employees receive regular training on cloud security practices and data protection principles.
 - Incident Response Plan* - A detailed incident response plan is in place to address any data breaches swiftly and effectively.

Child Privacy and other Web Links

CHILDREN'S PRIVACY

We do not knowingly collect Personal Information from minors under the age of 14 ("Children"). If you are a minor under the age of 14, please do not provide us with Personal Information without the express consent of a parent or guardian. If you are a parent or guardian and you are aware that your Child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children without verification of parental consent, we take steps to remove that information from our servers.

LINKS TO OTHER SITES

Our Service may contain links to other websites that are not operated by Daniels Health. If you click on a third-party link, you will be directed to that third party's site.

We strongly advise you to review the Privacy Policy of every site you visit.

- ▶ **No Control Over Third-Party Sites** - We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services. This means that once you leave our website, our Privacy Policy no longer applies.
- ▶ **Third-Party Privacy Policies** - Third-party sites may have their own privacy policies that differ from ours. We encourage you to read these policies to understand how your Personal Information may be collected, used, and shared by these third parties.
- ▶ **Security and Data Protection** - While we strive to protect your Personal Information, we cannot guarantee the security of any information you provide to third-party sites. It is important to exercise caution and review the security measures in place on these sites.
- ▶ **Recommendations** - We recommend that you take the following steps when visiting third-party sites:
 - Review Privacy Policies* - Always read the privacy policies of any third-party sites you visit to understand their data practices.
 - Check Security Features* - Look for security features such as HTTPS in the URL, privacy seals, and other indicators of a secure site.
 - Be Cautious with Personal Information* - Avoid sharing sensitive Personal Information unless you are confident in the site's security and privacy practices.

Cookies

COOKIES AND TRACKING TECHNOLOGY

We use cookies and similar tracking technologies to collect and use Personal Information about you when you visit our websites or social media pages. This section explains what cookies are, how we use them, and your choices regarding cookies.

What Are Cookies?

- ▶ **Definition** - Cookies are very small files that are placed on your device (computer, smartphone, or other electronic devices) when you visit our website. They are widely used to make websites work more efficiently and to provide information to the site owners.
- ▶ **Types of Cookies** - There are different types of cookies, including session cookies (which expire when you close your browser) and persistent cookies (which remain on your device for a set period or until you delete them).

How We Use Cookies

- ▶ **Essential Cookies** - These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually set in response to actions made by you, such as setting your privacy preferences, logging in, or filling in forms.
- ▶ **Performance and Analytics Cookies** - These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us understand which pages are the most and least popular and see how visitors move around the site.
- ▶ **Functionality Cookies** - These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our pages.
- ▶ **Targeting and Advertising Cookies** - These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites.

Third-Party Cookies

- ▶ **We use third-party services** that use cookies, such as Google Analytics, to improve user experience, the supply of our products and services, and to analyze how our website is used. These third-party cookies are subject to the respective privacy policies of these external services.

Your Choices Regarding Cookies

- ▶ **Cookie Settings** - You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website.
- ▶ **Managing Cookies** - You can manage your cookie preferences through your browser settings. Here are some links to the help pages of major browsers:
 1. Google Chrome
 2. Mozilla Firefox
 3. Safari
 4. Microsoft Edge
- ▶ **Opt-Out Tools** - You can also opt-out of cookies from specific third-party services by using opt-out tools provided by these services.

Changes to This Cookie Policy

- ▶ **We may update our Cookie Policy** from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We encourage you to review this page periodically for the latest information on our cookie practices.

Your Legal Rights

YOUR LEGAL RIGHTS

It is important that the Personal Information we hold about you is accurate and up to date.

Please keep us informed of any changes to your data.

You have the following legal rights with respect to your Personal Information:

- ▶ To be informed as to how your Personal Information is being used
- ▶ To access your Personal Information.
- ▶ To have your Personal Information rectified if it is inaccurate or incomplete.
- ▶ To request that computerized Personal Information we hold about you be communicated in the form a written and intelligible transcript (Data Portability).
- ▶ To require us to cease disseminating Personal Information or to de-index any hyperlink attached to your name that provides access to information by a technological means, if the dissemination of the information contravenes the law, a court order or under circumstances provided by law.
- ▶ To be informed if we used Personal Information to render a decision based exclusively on an automated processing of such information. In this case, you will be informed not later than at the time you are informed of the decision.
- ▶ To withdrawal of consent to the use of your Personal Information. In some cases, you may withdraw your consent to the disclosure or use of the Personal Information we have about you. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, this can lead to administrative difficulties and may result in the termination of services.

To exercise any of your legal rights, please contact us in the following ways:

- ▶ **Telephone:** 905-793-2966
- ▶ **Email:** PeopleandCulture@danielshealth.com
- ▶ **Address:** 52 Bramsteele Rd. Unit 8, Brampton ON L6W 3M5

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it.

Complaints and Contact Details

LODGING A COMPLAINT

We will only process your Personal Information in compliance with this Privacy Policy and all relevant laws and regulations. If you have cause for concern or are unhappy in any way, however, you may lodge a complaint with us using the contact details set out above.

You also have the right to make a complaint at any time to the Commission d'accès à l'information du Québec (the "CAI") using the form available on the Commission's website.

We would, however, appreciate the chance to deal with your concerns before you approach the CAI.

OUR CONTACT DETAILS

If you have any questions about this privacy policy, our privacy practices or to exercise any of your legal rights, please contact us in the following ways:

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- ▶ **Telephone:** 905-793-2966
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Governance and Staff Training

GOVERNANCE GUIDELINES

Daniels Health is committed to protecting your Personal Information throughout its life cycle in accordance with its privacy compliance program and the requirements of the Privacy Act.

Daniels Health has adopted privacy principles regarding the governance of the Personal Information it holds:

- ▶ We determine the purposes and objectives before collecting your Personal Information. Your Personal Information is then used only in accordance with these purposes and objectives.
- ▶ If we identify new purposes, we will seek express consent to allow us to process your Personal Information in accordance with those new purposes, unless otherwise permitted by law.
- ▶ We seek to collect only the information necessary to achieve the stated purposes.
- ▶ We ask your consent when collecting your Personal Information, and for sensitive Personal Information, we ask your express consent.
- ▶ We display our privacy policy in a clear and visible manner when we collect your Personal Information through a technological means.
- ▶ We ensure that our technology services with privacy parameters provide the highest level of confidentiality by default, without your intervention.
- ▶ We do not use technologies that allow identification, location or profiling without prior disclosure to you about such tools.
- ▶ We make sure your Personal Information is complete and up-to-date when we use it.

We conduct privacy impact assessments when required by law.

- ▶ To the extent possible, we restrict access to your Personal Information only to those of our personnel and service providers who require access to your Personal Information in connection with our operations.
- ▶ When we make fully automated decisions using your Personal Information, we make sure we communicate the use of such technology to you and we have a process in place whereby you can submit your observations.
- ▶ We do not disclose your Personal Information to third parties without your consent, except as authorized by law.

STAFF TRAINING

We strive to create a data privacy culture within Daniels Health and our staff regularly receive training on data protection principles and procedures both as part of the induction process and annual refresher training or as required with changes to regulations.

Confidentiality Incident

CONFIDENTIALITY INCIDENT INVOLVING YOUR PERSONAL INFORMATION

We are committed to promptly addressing any Confidentiality Incident involving your Personal Information.

In the event of a Confidentiality Incident, we will take the following steps:

► Immediate Containment and Assessment

Action - Our incident response team will immediately contain the breach to prevent further unauthorized access or damage.

Assessment - We will assess the scope and impact of the breach to understand the extent of the incident and the types of data involved.

► Notification to Affected Individuals

Criteria - If the breach poses a risk of serious harm, we will promptly notify affected individuals

Content - This notification will include:

1. Description of the breach.
2. The steps we have taken to mitigate the impact.

► Notification to Regulatory Authorities

Requirement - We will notify the Commission d'accès à l'information du Québec within the required timeframe.

Details - The notification will provide details of the breach, its potential impact, and the corrective measures being implemented.

► Investigation and Remediation

Investigation - We will conduct a thorough investigation to determine the cause of the breach.

Corrective Actions - Implement corrective actions to prevent future occurrences. This includes reviewing and updating our data protection policies and security measures as necessary.

► Documentation and Reporting

Record Keeping - Maintain detailed records of the incident, including the nature of the breach, the response actions taken, and the outcomes.

Reporting - Provide regular updates to senior management and relevant stakeholders on the status and resolution of the incident.

► Follow-Up and Review

Follow-Up - Follow-Up - Conduct follow-up activities to ensure that all corrective actions have been effectively implemented.

Review - Review the incident response process to identify any areas for improvement and update our incident response plan accordingly.