

## **Experium Health Solutions**

### **Privacy Policy**

#### **PURPOSE**

Experium Health Solutions (“Experium” or the “Business”) is committed to ensuring that it collects, uses, discloses, and safeguards personal information in a manner that respects the privacy rights of individuals. The purpose of this Privacy Policy (the “Policy”) is to set out Experium’s policy and practices in respect of collecting, using, disclosing, and safeguarding personal information.

#### **SCOPE**

This Policy applies to Experium’s operations in Canada and in respect of any personal information collected from individuals located in Canada. All employees, contractors, consultants, volunteers, and other individuals working for or on behalf of Experium are required to comply with this Policy at all times.

#### **DEFINITIONS**

The following definitions apply for the purpose of this Policy:

**“Personal information”** means information about an identifiable individual but does not include business contact information.

**“Contact information”** means any information that is used for the purpose of communicating or facilitating communication with an individual in relation to services to be provided through Experium such as the individual’s name, position name or title, address, telephone number, fax number or email address. This includes contact information for their emergency contact and/or their legal representative, as applicable.

#### **COLLECTING PERSONAL INFORMATION**

Unless the purposes for collecting personal information are obvious and the individual voluntarily provides their information for those purposes (for example, to verify identity), Experium will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.



Experium will only collect personal information that is necessary to fulfill the following purposes:

- (a) To coordinate requested services from Experium Health Solutions.
- (b) To respond to emergencies and protect employees from theft, fraud, and similar risks;
- (c) To comply with applicable laws; and,
- (d) To fulfill other purposes as required and communicated to affected individuals from time to time.

Examples of the types of personal information that Experium may collect to fulfill the purposes identified in this Policy include, but are not limited to:

- (a) Name, address, email address, telephone number, date of birth;
- (b) Information required by Experium's clients and/or applicable clinical providers;
- (c) Information about medical conditions and/or prescriptions that an individual voluntarily provides to Experium;
- (d) Work history, educational history, reference information and professional designations or certifications.
- (e) Any other information reasonably required to establish or coordinate requested services through Experium.

Experium will limit the collection of personal information to that which is reasonably necessary for the purposes identified.

Experium will not use or disclose personal information for any purpose other than those for which it was collected, as identified in this Policy or as communicated from time to time.

## **CONSENT**

Where required by the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 ("*PIPEDA*"), Experium will obtain an individual's consent to collect, use, or disclose personal information.

Consent may be provided explicitly either orally or in writing, or may be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the individual voluntarily provides personal information for that purpose.

An individual may withdraw consent to the collection, use, or disclosure of personal information on giving reasonable notice to Experium provided that such withdrawal of consent would not frustrate a legal obligation of Experium.

Experium may collect, use, or disclose personal information without an individual's knowledge or consent in the following limited circumstances:

- (a) When such collection, use, or disclosure of personal information is permitted or required by law;
- (b) In an emergency that threatens an individual's life, health, or personal safety;
- (c) When the personal information is available from a public source;
- (d) When Experium requires advice from external legal counsel;
- (e) For the purposes of collecting a debt;
- (f) To investigate an anticipated breach of an agreement or a contravention of law;  
or,
- (g) Any other circumstance authorized by law.

Experium will normally collect personal information directly from the individual; however, Experium may collect personal information from other persons with the individual's consent or as authorized by law.

In all circumstances, Experium will only collect, use, or disclose personal information for purposes that are reasonable.

## **RETENTION**

Personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, or as required by law.

Personal information that is no longer necessary to fulfill the purposes for which it was collected or that the Business is not otherwise required to retain by law or for business purposes will be destroyed or rendered non-identifying by authorized personnel.

## **ACCESS AND ACCURACY**

Individuals have the right to request access to:

- Their personal information that is in the possession of Experium;
- Information about the ways in which their personal information has been used by the Business; and,

- The names of the individuals and organizations to which their personal information has been disclosed by Experium.

On written request to the Experium's Privacy Officer, Experium will inform individuals of the existence, use, and disclosure of their own personal information and will be given access to that information to the extent permitted by law.

An individual may challenge the accuracy and completeness of their personal information in the Business' possession and request, in writing to the Experium's Privacy Officer, that their personal information be amended as appropriate.

Experium will respond in writing to an individual who makes a request in respect of their personal information within 30 days, unless the Business extends the timeline for responding to such request in accordance with *PIPEDA*. Where Experium denies a request for access to personal information, Experium will provide the reasons for such denial.

Experium will make all reasonable efforts to ensure that personal information retained by the Business is accurate, complete, and current. If the personal information is inaccurate or deficient with regard to the purposes for which the personal information was collected, Experium will correct or amend the individual's personal information.

## **SAFEGUARDING PERSONAL INFORMATION**

Experium will make every reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

Experium will safeguard personal information, including by taking the following measures as appropriate:

- (a) Retaining physical copies of documents containing personal information in locked offices, drawers, or filing cabinets;
- (b) Restricting access to personal information only to designated individuals on a "need to know" basis; and,
- (c) Encrypting and password protecting electronic devices and systems.



## **ACCOUNTABILITY**

Experium is responsible for protecting any personal information under its control and has designated Gabby Giannetti as its Privacy Officer. Questions or concerns regarding privacy procedures or the Business' compliance with applicable privacy legislation may be directed to the Privacy Officer by emailing [privacy@experium.co](mailto:privacy@experium.co) or by calling (844) 601-3680 during the Business' business hours, 9 a.m. to 5 p.m. EST, Monday to Friday.

## **REVIEW OF THE POLICY**

This Policy will be reviewed annually and may be amended from time to time at the sole discretion of Experium Health Solutions.