

Privacy Policy

NOTE: Please read this entire privacy policy before using our Web site. For the purposes of this privacy policy, [CLINIQUE PODIATRIQUE DE L'OUTAOUAIS] will be referred to as "THE ORGANIZATION".

Thank you for visiting the ORGANIZATION's website and reading its privacy policy (hereinafter the Policy).

By browsing our website or using our systems or services, you acknowledge that you have read and understood this Policy and consent to the processing of your personal data and information in accordance with this Policy, where applicable.

This Privacy Policy is composed of the following elements:

1. Purpose of the Privacy Policy
2. Effective Date;
3. How consent is obtained;
4. Purpose of data collection;
5. Personal information collected;
6. Data processing purposes;
7. Processing methods used;
8. Access to and control of personal information;
9. Sharing and reasons for sharing personal information with third parties;
10. Use of cookies and similar technologies;
11. Retention of Personal Information.

Important definitions

In this Policy, "Privacy Incident" means (i) any access to Personal Information that is not authorized by law; (ii) any use of Personal Information that is not authorized by law; (iii) any disclosure of Personal Information that is not authorized by law; or (iv) any loss of or other breach of Personal Information.

"Personal information" means any information that relates to a natural person and allows, directly or indirectly, that person to be identified.

1.Objectives of the Privacy Policy

Respect for privacy and the protection of personal information are essential to us, which is why, through this Policy, we intend to protect personal information in accordance with applicable laws.

To ensure this protection, THE ORGANIZATION will only collect, process and share personally identifiable information with the consent of the individual, unless permitted or required by law, in which case your consent will not be required.

The purpose of this Policy is to inform users of why and how THE ORGANIZATION, or anyone acting on its behalf, will collect and use their personal information. It is intended to be in plain language to ensure informed consent from users.

For the purposes of this Policy, "personal information" means any information about an identifiable individual or information that allows an individual to be identified. Wherever possible, we will anonymize, pseudonymize and/or aggregate such information so that it no longer identifies an individual.

2. Effective date

This Policy applies from September 1, 2023.

3. Consent procedures

We are committed to obtaining consent before collecting personal information from an individual. Consent may be express and may be provided directly by the individual or by his or her authorized representative.

We prefer to obtain express consent, whether verbally, electronically or in writing.

If we wish to use personal information for a new purpose, we will describe the intended use and ask for consent again.

It may not always be possible, particularly in the case of government requests, to obtain consent for the collection, use or disclosure of personal information. We undertake never to disclose such information, other than in accordance with this Policy, except as required or permitted by law.

4. Purpose of data collection

Information is collected in accordance with the purposes and objectives set out in this Privacy Policy.

Here are some of the reasons why we collect your personal information:

- **To provide products and services:** we will collect and process the data and information necessary to fulfill our mission and contractual obligations.
- **To ensure and improve these products and services:** data collected during your interactions with our services may be used to analyze and improve the operation of our products and services.
- **To develop new products and services and for AI:** The data collected may be used in a research and development context to offer new products and services to our users, notably through advertising and marketing messages. In addition, collected and aggregated data may be processed by algorithms using artificial intelligence.

- **To offer personalized products and services:** the collection and analysis of data generated by your interactions with our services enable us to develop and create products and services that are relevant to your expectations in terms of culture and entertainment, in particular in order to plan adaptation measures for customers who require them.
- **To evaluate the performance of products and services:** data is collected in order to obtain information on the advantages and disadvantages of our products and services, and to evaluate and resolve them if necessary, notably through surveys. This enables us to ensure the quality of our products and services, as well as promoting risk management.
- **To protect the privacy of our users:** The data collected enables us to verify the identity and protect the privacy of people who communicate with us by telephone, electronically or otherwise.
- **To meet legal obligations:** Data is collected to meet obligations arising from laws, regulations or international treaties.

5. Personal information collected

The ORGANIZATION may collect personal information in various forms, but will do so only by lawful means and only for the necessary purposes disclosed to you, as described in this Policy, or as permitted or required by law.

The personal information collected, and its sensitivity, may vary depending on the context of your interactions with THE ORGANIZATION. This is why it is our priority to inform you of the nature of the personal information we use.

We protect all personal information we collect. Among the personal information that may be collected and used, we pay particular attention to :

Name and contact information. First and last name, e-mail address, mailing address, telephone number and other similar data used to contact you.

Proof of identity. Passwords, password hints and similar security information used to identify you and access your account.

Demographic information. Information about you, such as your age, gender, country and language of communication.

Payment information. Data required to process your payments, such as your payment instrument number (e.g. your credit card number) and the associated security code.

Interactions. Data relating to your use of our websites, platforms and tools. This is data that you provide in order to use the products. In other cases, such as error reports, this is data that we generate.

Other examples of interaction data we collect include:

- **Data on sites visited and usage.**

For example:

- Payment and account history. Data on items you purchase and activities associated with your account.
- Problem resolution and help data. Data you provide when you contact THE ORGANIZATION for assistance, including the products you use, and other information that helps us solve your problem.
- **Interests and preferences.** Data about your interests and preferences. Apart from the information you have explicitly provided, the other data we collect sometimes allows us to define or guess your interests and preferences.
- **Content consumption data.** Data on the multimedia content (e.g., television, video, music, audio, books, applications and games) you access through our products.
- **Searches and orders.** Search queries and commands you employ when using our website.
- **Location data.** Data, which may or may not be precise, about the location of your device. For example, it is possible to collect location data from a device's IP address or from data in your account profile indicating with less precision where you are, such as the name of a town or a zip code.
- **Other data.** Other data provided when you use our website, including but not limited to data from Google Analytics and other statistical tools.

Your personal information is handled as follows:

How we collect your personal information?	In person, over the phone, website, facebook, fax, scan.
What personal information do we collect?	Name, address, telephone number, e-mail address, Quebec health insurance number, pharmacy name, date of birth, personal health record.
From whom do we collect your personal information?	The individual, health care environment (hospital, pharmacy, residence, family, RAMQ, CLSC).
Why do we collect your personal information?	To provide appropriate care.
What happens if you do not consent to the collection of your personal information?	File incomplete, cannot provide appropriate care
Who will have access to your personal information?	Doctors, nurses, nursing assistants, administrative staff, support staff, manager
How will we share your personal information with third parties?	Fax, telephone, in person, by proxy
How long will we keep your personal information?	We follow the law on the retention of personal information and will destroy it when it is no longer needed to fulfill the purposes for which it was collected.
What are the risks involved in processing your personal information?	Processing is always done confidentially and with discretion, however, there is always a risk, especially since we must retain all personal information until it is no longer required.
Where do we keep your personal information?	With our EMR provider, Telus Medesync

The technological products used are:

Name of software	Name of supplier	Utilities	Update schedule
Medesync	Telus	Medical record	As required

6. Data processing purposes

To provide our products and services. We use data to operate our products and services, as well as to provide you with rich, interactive experiences.

Product and/or service improvement. We use data to improve our products, in particular by adding new functionalities or capabilities (error report at the time of a transaction, by consulting a specific section of our website, etc.).

Personalization. Some products include personalized features, such as recommendations that optimize your experience and satisfaction. These features use

automated processes to tailor your experiences based on the data we have about you, such as inferences we make about you and your use of the product, your activities, your interests, your location.

Product and/or service development. We use data to develop new products. For example, we use anonymized or pseudonymized personal information to better understand our customers' needs.

Customer support. We use data to diagnose and resolve problems with products and/or services, restore access to your personal account, provide other support and assistance services.

To help secure and resolve problems. We use data to help secure and resolve problems with our products and services. This includes using data to ensure the security of services offered to our customers, detecting malware and malicious activity, resolving performance and compatibility issues to help customers get the most out of their experience and informing them of updates to our products and services. This may include the use of automated systems to detect security problems.

Security. We follow industry security standards to protect the information we collect and receive. In particular, we have put in place appropriate physical, technical, IT and administrative safeguards to protect your personal information against any breach of confidentiality. Despite these measures, given the risks inherent in the use of computer systems, we cannot ensure or warrant the security and confidentiality of any information you transmit or provide to us, and you do so at your own risk. If you have reason to believe that personal information has been compromised, please contact us as indicated in section 11 of the Policy.

Relevant offers. The ORGANIZATION uses data to provide you with relevant and important information about the products and services we offer. We analyze data from different sources to predict what information will be most interesting and relevant to you and communicate it to you in different ways. For example, we can predict your interests and suggest new activities that you might enjoy.

Advertising. ORGANIZATION uses data collected through our interactions with you, some of our products and on third-party websites to advertise our products and services, including on third-party websites. We may sometimes use automated processes to make advertisements more relevant.

Reporting and business operations. We use data to analyze our operations and improve decision-making. This enables us to make informed decisions and create reports on the performance of our business.

Protection of rights and property. We use data to detect and prevent fraud, resolve disputes, enforce contracts and protect our property. We may use automated processes to detect and prevent activities that violate our rights and those of third parties.

Legal compliance. We process data to comply with the law. For example, we use the age of our customers to ensure that we comply with our obligations to protect the privacy of children or to ensure that the customer complies with the recommended age for the audience. We also process contact details and identifiers to help customers exercise their data protection rights.

Research. We use data to carry out research, particularly for scientific purposes and in the public interest, where permitted by law.

7. Processing methods used

The ORGANIZATION attaches the utmost importance to the security of your personal information and undertakes to process it in accordance with industry norms and standards, solely for the purposes for which it is collected as described in this policy or in a specific notice to that effect. However, given the security limitations inherent in transmission via the Internet, it is impossible to safeguard your personal information absolutely. Information transmitted to us is therefore ultimately at the user's own risk.

8. Access to and control of personal information

The ORGANIZATION ensures that all personal information in its possession is as accurate, current and complete as is necessary for the purposes for which it is to be used.

From the date required by law, you have the right to request access to your personal information for verification purposes and to request a correction if it is inaccurate. If you believe that your personal information is inaccurate, or if you wish to have access to your personal information, you may make a request using the contact information provided at the end of this policy.

To the best of our ability, we will provide you with timely access to your personal information. However, for security reasons, we may need to verify your identity.

There may be circumstances where we will not be able to provide you with access to your personal information. For example, where access may lead to the disclosure of another person's personal information and that person refuses to consent to the disclosure, or where legal restrictions apply. Should such a situation arise, we will advise you of the reason why we cannot provide you with access to your personal information.

If your request concerns data appearing on third-party web pages or platforms, please contact those third parties directly.

9. Sharing and reason for sharing personal information with third parties

We do not share your personal information with companies, organizations, or individuals outside THE ORGANIZATION, with the exception of our authorized suppliers and partners who need access to the information for the purposes listed in this policy and within the limits of this policy, as well as in the following cases:

- With your consent.
- For storage on cloud servers, in which case personal information could transit through third-party jurisdictions! Note that we only retain the services of reputable companies with privacy policies.
- For external processing purposes: We transfer personal information to other trusted companies or individuals who process it on our behalf, according to our instructions, in

compliance with this privacy policy, with a degree of data security at least equivalent to our own and in compliance with any other appropriate security and confidentiality measures.

- For legal reasons: We transmit personal information outside our company if access to it is necessary to comply with applicable laws and regulations.

The ORGANIZATION will not sell or rent your personal information to third parties.

10. Cookies and similar technologies

The ORGANIZATION may use cookies, web beacons, web beacons, web beacons, log files or other technologies to collect certain personal information about visitors to our Web sites, and about recipients of our newsletters, invitations and other communications. Cookies are pieces of information transmitted by the server to the browser during a Web site visit that uniquely identify the current connection. This data may include, but is not limited to, information such as your Internet Protocol (IP) address, browser type, browser version, the pages of our site you visit, the time and date of your visit, the time spent on the site and any other statistics.

Cookies are used to retrieve search history and shopping baskets (e.g. online purchases) linked to the session, to facilitate the user's online browsing experience. It is important to note that, depending on the settings you choose, activating the cookies option may allow other servers to install cookies on your system. You can set your browser to notify you of the presence of cookies, giving you the chance to decide whether or not to accept them.

Please note that our Web site may contain links or references to third-party sites. This policy ceases to apply when you leave our website and THE ORGANIZATION is not responsible for the collection or processing of personal information by or through such third parties or external sources.

11. Retention of personal information

The ORGANIZATION keeps the data collected for different periods of time, depending on its nature and its usefulness in offering our products and services. During the retention period, THE ORGANIZATION takes physical and technical measures to ensure the security of data containing personal information.

The main places where personal information is stored are in cities where THE ORGANIZATION has offices or facilities, and in cities where the Web host has servers containing data collected by THE ORGANIZATION.

Personal information may be held outside the country in which you live, if a third-party supplier or other entity to whom we disclose personal information in accordance with this Policy is located outside the country. In such cases, personal information may be subject to the local laws of the countries or territories in which the information is collected, used, disclosed or stored, and may be accessible to the governmental and law enforcement authorities of those countries or territories.

Once the retention period has expired, personal information is destroyed. Only statistics or reports containing de-identified and anonymized data may be retained for extended periods.

Other information

Changes to these rules:

We make changes to this Privacy Policy from time to time. Any reduction in your rights under this Privacy Policy will not be implemented without your express consent. We will always indicate the date on which the latest changes were made and allow you to access archived versions for review. If the changes are significant, we will post a prominent notice on our Web site (including, for certain services, via e-mail notification).

Person responsible for the protection of personal information:

If you have any questions, comments or complaints about this policy, you may contact the person responsible for ensuring compliance with this privacy policy:

Privacy Officer

Dre Lynda Cormier

info@cpoutaouais.com

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