

Privacy Statement of MedManager Interactive Corporation

Overview

This Privacy Statement describes how MedManager Interactive Corp. (“MedManager”) collects, uses, and discloses (shares) your personal information, including as applicable your personal health information. At MedManager, we value your privacy and it is our goal to ensure your personal information is collected, used and disclosed generally with your consent, for reasonable, limited purposes, and as otherwise permitted or required by applicable law. As well, your personal information will be stored using secure methods.

Our Privacy Statement is based on requirements of the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*, and the Ontario *Personal Health Information Protection Act (PHIPA)*.

MedManager will ensure that its privacy practices adapt to changes in regulations, technology, and visitor/user needs and expectations. Thus, MedManager reserves the right to update its Privacy Statement occasionally, with the date of the last revision identified above.

Any feedback or questions regarding MedManager’s Privacy Statement are welcome and should be directed to MedManager either by telephone at (519) 747-2492 or by postal mail at 221-A McIntyre Dr., Kitchener, Ontario, N2R 1G1. Please note that all formal requests should be made in writing.

A. Scope of Privacy Statement

Our Privacy Statement applies to all personal information MedManager collects, uses or discloses, including personal information provided by individuals:

- who visit MedManager’s corporate website (www.medmanager.ca); or
- who subscribe to the MedManager chronic disease wellness portal (the “Portal”).

B. Personal Information/Personal Health Information

- Personal information is data that can be used to identify you specifically, which can include non-business contact information such as your name and personal mailing address, e-mail address, and phone number.
- Personal health information has the definition set out in PHIPA, and includes personal information which relates to the physical or mental health of, or the providing of care to, an individual. In most cases the personal health information used by MedManager is that of client subscribers (users with remote Portal accounts).

C. Management of Personal Information/Personal Health Information

MedManager's management of personal information and personal health information is bound by the policies below:

i. Accountability

MedManager's Privacy Officer is responsible for MedManager's compliance with this Privacy Statement. The contact information for the Privacy Officer is found at the end of this Privacy Statement.

ii. Statement of Purposes

MedManager:

- collects *personal information*, including through the MedManager corporate website, and uses and discloses such personal information for the purposes identified at the time of collection, and as otherwise permitted or required by applicable law; and
- collects, uses and discloses *personal health information* through the MedManager Portal, for storage and retrieval by the subscriber/client and their approved healthcare professional(s) and other health information custodians (each, a "**Custodian**") and other approved caregivers (e.g. spouse, child), (a) for the purpose of providing health care or assisting in the provision of health care, specifically through self- and collaborative-health management (which may include, as ancillary to such purpose, the use of personal health information by MedManager staff and agents to provide technical and registration support to client subscribers and Custodians); (b) for such purposes for which the client subscriber otherwise consents; and (c) as otherwise permitted or required by applicable law. In some cases MedManager will collect, use and disclose personal health information through the Portal as an agent for one or more Custodians, and in other cases MedManager will do so on behalf of a subscriber directly.

Personal information may be aggregated (grouped) in a format that does not identify specific individuals, or otherwise anonymized, for statistical or medical research purposes. Such non-personal information may be distributed to the commercial or non-commercial benefit of MedManager and others, unless otherwise prohibited.

iii. Consent

Individual knowledge and consent are required for the collection, use, or disclosure of personal information and personal health information, except to the extent such collection, use or disclosure is otherwise required or permitted by law. In the case of personal information, where certain Custodians receive personal health information about an individual from the individual, the individual's substitute decision-maker or another Custodian for the purpose of providing health care or assisting in the provision of health care to the individual, that Custodian is entitled to assume that it has the individual's implied consent to collect, use or disclose the information for the purposes

of providing health care or assisting in providing health care to the individual within this “circle of care”, unless the receiving Custodian is aware that the individual has expressly withheld or withdrawn the consent.

Where MedManager collects, uses and discloses personal health information through the Portal:

- as an agent for one or more Custodians, in most cases this will be for the purpose of providing health care such that implied consent applies; or
- on behalf of a subscriber directly, MedManager will obtain all required consents for such collection, use and disclosure in connection with the initial registration of the subscriber.

iv. Limits on Collection, Use, and Disclosure

MedManager limits its collection, use and disclosure of personal information and personal health information to that which is necessary for the purposes for which the client subscriber otherwise consents, and as otherwise permitted or required by applicable law.

Personal health information is entered directly into the MedManager Portal by a subscriber, Custodians and other approved caregivers, or transferred via a secure connection with other health information systems.

v. Limits on Retention

MedManager keeps personal information and personal health information for as long as required to fulfill the purposes for which it was collected, and otherwise as long as permitted or required by law.

vi. Safeguards

MedManager provides a range of administrative, technical, and physical security safeguards for the personal information and personal health information which are in each case appropriate in light of the sensitivity of the applicable information. MedManager staff and agents and third parties who access the data must obey MedManager’s privacy policies and procedures.

vii. Individual Access to Personal Health Information

Subject to certain exceptions, individuals have the right to request in writing a copy of their personal information and their personal health information, and MedManager will respond, in accordance with PIPEDA. Where MedManager is acting as an agent to a Custodian with respect to personal health information, however, each access request for personal health information should be made directly to – and MedManager will forward each such request which it receives to – the applicable Custodian.

viii. Accuracy

MedManager, within the limits of its ability, keeps information as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. Individuals may seek to correct their personal information and their personal health information, and MedManager will respond, in accordance with PIPEDA. Where MedManager is acting as an agent to a Custodian with respect to personal health information, however, each request for correction of such personal health information should be made directly to – and MedManager will forward each such request which it receives to – the applicable Custodian.

xiv. Privacy Breach Notification

If a user knows or suspects that their MedManager account information has been stolen, lost or accessed by unauthorized persons the individual should notify MedManager immediately by calling our Customer Support Centre. MedManager will enact its Privacy Breach Procedure to resolve the issue. Where MedManager is acting as an agent to a Custodian with respect to personal health information, however, each notification regarding such personal health information should be made directly to – and MedManager will forward each such notification which it receives to – the applicable Custodian.

xv. Website and MedManager Portal

- *Community Forum:* MedManager’s Portal offers an optional Community Forum in which subscribers may choose to anonymously post questions and answers to other subscribers. MedManager is not responsible for, or liable for any damages resulting from, the disclosure (sharing) of personal information or personal health information by an individual subscriber if they choose to include personally-identifying details in the text of a posted question/answer. MedManager strongly recommends that Community Forum users not disclose any personally-identifying information.
- *Anonymous Information:* Anonymous visitor information refers to data that cannot be related to a specific individual. The MedManager corporate website and Portal track and produce two types of non-identifying information: visitor and subscriber (user), respectively. Both types are combined into aggregate data.

i. Website Visitor Information

As you browse the MedManager corporate website (www.medmanager.ca), our computer collects information and statistics about your visit, but not about you personally. We may monitor statistics such as how many people visit our site and which pages people visit on our site.

Anonymous visitor information is collected on a group basis and no personal information is associated with these statistics. Aggregate visitor information

helps us to continually improve the MedManager corporate website to meet the needs of our users better.

ii. **Portal Subscriber Information**

Anonymous subscriber information refers to the data of a group of unidentifiable users of the MedManager Portal. Although the aggregate data is based on personal information, it does not permit the identification of individuals when aggregated and analyzed. As noted in section C.ii, personal information may be grouped in a format that does not identify individuals for statistical or medical research purposes. Aggregated data may be distributed to the commercial and non-commercial benefit of MedManager and others, unless prohibited otherwise. As an example, aggregate data is helpful in tracking group performance and health outcomes, which enables planning for future healthcare programs and products.

- *Cookies:* Cookies are pieces of information that a website transfers to an individual's computer for record-keeping purposes. The use of cookies is an industry standard on most major websites, and no personal information is collected in connection with such cookies. MedManager **does not use permanent (or persistent) cookies for any purposes**. MedManager **does use "temporary" cookies** that are technical in nature. These cookies are required by the software system that MedManager uses, but are removed automatically from your computer when you close your browser. They are not stored permanently. If you disable or refuse cookies, you will not be able to log in to the subscriber section of MedManager, and some parts of the public (non-subscriber) site may not function properly.
- *External Websites:* MedManager's Privacy Statement applies only to MedManager and does not apply to external websites accessible through links on the MedManager website or the Portal.

D. Challenges to Compliance

Any individual for whom we have personal information or personal health information may challenge our compliance with this Privacy Statement by addressing their concerns to the Privacy Officer of MedManager, at our current business address: 221-A McIntyre Dr., Kitchener, Ontario, N2R 1G1.