

PRIVACY POLICY

ACCESSA+

Latest update: July 12th, 2021



PLEASE READ THE FOLLOWING PRIVACY POLICY CAREFULLY

9408-6758 Québec Inc. (d.b.a ACCESSA) and its affiliates (“**ACCESSA**” or “**we**”) respect your privacy and are committed to protecting it by complying with this policy. This policy explains how we collect, use, maintain, disclose and protect the personal information of our customers, patients and website users (“**you**”), including through our websites (which includes ACCESSA’s other Internet sites, mobile apps and social media sites, if any, which we refer to collectively as “**Sites**”), as well as any email, text and other electronic messages between you and our Sites, and any customer service interactions we have with you. This policy also describes the types of information we may collect from you or that you may provide when you visit the Sites, and our practices for collecting, using, maintaining, disclosing and protecting that information.

The Sites may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

Please read this policy carefully to understand our policies and practices for collecting, processing and storing your information. If you do not agree with our policies and practices, your choice is not to use our Sites. By accessing or using our Sites, you indicate that you understand, accept and consent to the practices described in this policy. This policy may change from time to time. Your continued use of our Sites after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates.

WHAT INFORMATION DO WE COLLECT?

Personal information is generally defined as any information about an identifiable individual, which includes information that can be used on its own, or with other information, to identify, contact or locate a single person.

The personal information we collect depends on which of ACCESSA’s services you are using, and may include:

- Your complete name
- Your mailing address
- Your date of birth
- Your gender
- Your e-mail address
- Your telephone number
- Your client identification ACCESSA (number)
- The prescription drug(s) you use or used
- Your health care professional’s name and contact information
- The pharmacy at which your drug is dispensed
- Your drug insurer information or benefit carrier information
- Your spousal insurance information
- Your income and information about dependents
- Your medical history
- Your clinical information, such as adverse drug reaction or value of laboratory analysis
- Your mandatory information (a mandatory is a person you have authorized to act on your behalf), if applicable

And any other identifier we may use to contact you (collectively, the “**personal information**”).

In addition, we may collect the following types of information:

- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. We may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Site feature.

- **Technical information**, including your login information, browser type and version, operating system and platform, or information about your internet connection, the equipment you use to access our Sites, and usage details.

- **Non-personal details about your Site interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Sites (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), or any phone number used to call our customer service number.

You may choose not to provide us with your personal information. We provide an opportunity for any user to unsubscribe from our collection or opt-out of contact on an ongoing basis by emailing or calling a Accessa caseworker at the email address or phone number using the contact information listed below in the "Contact Us" section.

HOW IS INFORMATION COLLECTED FROM YOU?

We collect information directly from you. The following are a few examples of when and how we can collect information from you:

- During your interactions with us as a registered user of our Sites and through telephone conversations.
- Information that you provide by filling in forms on our Sites. This includes information provided at the time of registering to use our Sites. We may also ask you for information when you report a problem with our Sites.

We collect information from other sources. We may receive and collect information about you from third party business partners. The following are examples of third party business partners from whom we collect information:

- **Information from Pharmacies.** Pharmacies may provide us with claim information in accordance with the standard rules of electronic claims transmission defined by the Canadian Pharmacists Association (CPhA). This is the same information provided to other Canadian insurers and benefits carriers. Claim information is used to determine eligibility for coverage, and to verify, assess, pay and audit claims. We anonymize this personal information before we save it. This means that information ceases to be personal information because it cannot be used to identify you.

- **Prescriber Information.** Prescribers are the health care professionals who issue prescriptions. ACCESSA may distribute program materials to prescribers, which prescribers may in turn provide such materials to their patients.

- **Information from Adjudicators.** Adjudicators are health benefits managers that provide information about patients based on prescription information and pharmacy system data.

HOW DO WE USE YOUR INFORMATION?

To the extent permitted by applicable law, we may use personal information:

- To present our Sites and their contents to you.
- To provide you with information, products or services that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected or for any other purpose for which you provided it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To send administrative information to you, for example, information regarding the Sites and changes to our terms, conditions and policies. Because this information may be important to your use of the Sites, you may not opt-out of receiving these communications.
- To re-contact you if we have not heard from you in a while, in accordance with applicable law.
- For our business purposes, such as analyzing and managing our businesses, market research, audits, enhancing our Sites, improving our services, identifying usage trends, tailoring the Sites experience and content based on your past activities on the Sites and gauging customer satisfaction and providing customer service (including troubleshooting in connection with customer issues).
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates or partners; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- For any other purpose, with your consent.

HOW DO WE DISCLOSE YOUR INFORMATION?

We may disclose aggregated information about our users and information that does not identify any individual, without restriction.

To the extent permitted by applicable law, your personal information may be disclosed:

- To health care professionals for, among other things, the purposes of following up on cases. For instance, pharmacists who use the Sites may have access to certain patient information.
- To our affiliates for the purposes described in this policy.
- To our third party service providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, infrastructure provision, IT services, customer service, email delivery services, auditing services and other services, to enable them to provide services.
- To our third-party strategic partners with whom we may enter into a special relationship. For instance, for the purposes of compiling and analyzing the clinical data collected. We will provide you with choices regarding this sharing prior to sharing your personal information with a particular strategic partner. Because these third parties will use your personal information in accordance with their own privacy practices, you should check their websites for information regarding their privacy practices.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or shares (including in connection with any bankruptcy or similar proceedings).
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- To fulfill the purpose for which you provided it.
- With your consent.

DATA SECURITY

The security of your personal information is very important to us. We use physical, electronic and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure, including:

- We review our information collection, storage and processing practices, including physical security measures, to prevent unauthorized access to our systems.
- We restrict access to personal information to ACCESSA employees, contractors and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined, terminated and/or prosecuted if they fail to meet these obligations.

The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Sites, you are responsible for keeping this password confidential. We ask you chose a password with sufficient security features and you not to share your password with anyone, unless necessary.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Sites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites.

RETAINING YOUR INFORMATION

Financial information and other claim data will be retained for as long as required by applicable legal requirements, by contractual commitments, or for a period of seven years from the date the information was last used, whichever is longer.

Except as otherwise permitted or required by applicable law, we will only retain any other personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any contractual, legal, accounting or reporting requirements. For instance, such personal information may be retained in accordance with the policies of manufacturers or service providers assisting with the Sites and ACCESSA's programs.

Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

CHILDREN UNDER THE AGE OF 14

Our Sites are not intended for children under 14 years of age. We do not knowingly collect personal information from such children, without parental consent.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

To review, correct, update, suppress, delete or otherwise limit our use of your personal Information that has been previously provided to us, please email, call or write to us using the contact information listed below in the "Contact Us" section and clearly describe your request. We may not accommodate a request to change information if we believe the change would violate any legal requirement or cause the information to be incorrect.

We will try to comply with your request as soon as reasonably practicable. Note that despite our efforts, there may be residual information that will remain within our databases and other records, which will not be removed or changed. Further, please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion. Please see the "Retaining Your Information Section" for more information.

Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

If you are concerned about our response or would like to correct the information provided, you may email or call a Accessa caseworker at the email address or phone number using the contact information listed in the "Contact Us" section.

WITHDRAWING YOUR CONSENT

Where you have provided your consent to the collection, use and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please email, call or write to us using the contact information listed below in the "Contact Us" section. Please note that if you withdraw your consent we may not be able to provide you with our service.

Note that despite our efforts, there may be residual information that will remain within our databases and other records, which will not be removed or changed. Further, please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion. Please see the "Retaining Your Information Section" for more information.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to change our privacy policy at any time. We will alert you that changes have been made by indicating at the top of the privacy policy the date that it was last updated. This privacy policy was last updated on July 12, 2021. We encourage you to review our privacy policy carefully to make sure that you understand how information that you provide will be used or disclosed. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Site home page.

CONTACT US

If you have additional questions, comments or requests regarding this privacy policy and our privacy practices, or want to access, update or correct inaccuracies in your personal information, you can call us at **438-800-6609**, or reach us by email at **info@accessa.ca**.

You can also write to us at:

ACCESSA
8000, boul. Langelier, bureau 303
Montréal QC H1P 3K2

Attention:
Privacy Officer