

TELUS Health Wellbeing Privacy Commitment

TELUS Health Wellbeing is a digital platform that enables you to better manage your health and wellbeing (the "Service").-We are passionate about the protection of your Personal Information and are committed to respecting your privacy.

TELUS Health Wellbeing policy to protect your privacy

Here's the summary:

By accessing or using the TELUS Health Wellbeing platform, you understand that your information will be treated in accordance with this TELUS Health Wellbeing Privacy Commitment ("Privacy Commitment"). Our Privacy Commitment and practices are consistent with the 10 Fair Information Principles and we strive to apply the principles of Privacy by Design in the development and review of our products and services.

If you do not want us to collect, use or disclose your Personal Information in the ways identified in this Privacy Commitment, you may choose not to use TELUS Health Wellbeing.

Here's the detail:

We have developed this TELUS Health Wellbeing Commitment to provide you with specific details about how TELUS Health Wellbeing collects, uses, discloses and stores your Personal Information when you use the TELUS Health Wellbeing mobile app, visit our website available [here](#), or otherwise interact with us.

The Privacy Commitment reflects the requirements of applicable Canadian privacy legislation, including provincial and federal privacy laws, and our own continuing commitment to privacy.

Please read this Privacy Commitment carefully. By accessing or using TELUS Health Wellbeing, you consent to the collection, use, disclosure and storage of Personal Information in accordance with this Privacy Commitment.

Definitions

The following definitions apply to this Commitment.

You - An individual who uses, or registers to use, TELUS Health Wellbeing.

User Record - Any information related to activity or actions completed on the TELUS Wellbeing Platform. This may include but is not limited to:

- Activity tracked on the platform
- Wellbeing assessments completed
- Badges, Leaderboard Positions or Other Activity
- Social activity on the platform including like, comments
- Groups or Events you join or participate in

Personal Information - Any information about an identifiable individual, other than business contact information used to contact the individual in their business or professional capacity. Personal Information includes your TELUS Health Wellbeing account profile and User Record.

Personal Information does not include de-identified or aggregated information that cannot reasonably be associated with a specific individual.

TELUS Family - In this Privacy Commitment, “TELUS Family” means TELUS Communications Inc. and its subsidiary companies and corporate affiliates, as they may exist from time to time.

TELUS Health Wellbeing - In this TELUS Health Wellbeing Privacy Commitment, the words "we", "us", "our" or "TELUS" refer to Sprout Wellness Solutions Inc.

Accountability

Here's the summary:

TELUS Health Wellbeing has overall responsibility for protecting the privacy of the Personal Information we collect about you through TELUS Health Wellbeing, and

we are directly accountable to you with respect to the handling of that information.

Here's the detail:

The Wellness Services are available in Alberta, British Columbia, Manitoba, New Brunswick, Newfoundland and Labrador, Nova Scotia, Ontario, Quebec, Prince Edward Island, Saskatchewan, Northwest Territories, Nunavut, and Yukon. In these provinces and territories, TELUS has overall responsibility for protecting your Personal Information and we are directly accountable to you.

Consent

Here's the summary:

When you access or use TELUS Health Wellbeing, you consent to our collection, use, disclosure, and storage of your Personal Information as described in this Privacy Commitment.

You can withdraw your consent at any time, subject to limited restrictions.

Here's the detail:

When you use TELUS Health Wellbeing, you consent to our collection, use, disclosure, and storage of your Personal Information in accordance with this Privacy Commitment.

You can withdraw your consent to the collection, use and disclosure of your Personal Information, subject to our legal or contractual restrictions. However, if you refuse to provide certain information or withdraw your consent, this may limit our ability to provide you with TELUS Health Wellbeing.

If you want to delete your account, we may retain certain information to meet our legal or regulatory obligations; for example, Personal Information that forms part of your Medical Record must be retained for a period of time to meet legal and regulatory obligations. Please review the 'Retention' section below for more information on our retention practices.

To collect, use or disclose Personal Information outside of the purposes contemplated in this Privacy Commitment, we will seek additional consent from you.

Individuals under the age of 16 may not create an account on TELUS Health Wellbeing.

Collection and Use of Personal Information

Here's the summary:

We collect only the Personal Information required for us to establish and maintain a responsible healthcare and service relationship with you, to provide our services, and to develop, enhance or market our products and services (including to send you relevant information about products and services that may be of interest to you), and to maintain and improve the security and functionality of our wellness platform.

We collect Personal Information to set up an account for you on the TELUS Health Wellbeing App so that you can access and use the TELUS Health Wellbeing health-related services.

We also collect other information from you as you use the TELUS Health Wellbeing Services:

- **App usage information**
- **Website and device information**
- **Cookies**

We may use Personal Information to send you communication, including newsletters. You can opt out of receiving them at any time.

Here's the detail:

By creating an account with TELUS Health Wellbeing, you will have access to tools to help you manage your health and well-being through the App.

We only collect and use Personal Information for the following purposes:

To establish and maintain our relationship with you

TELUS Health Wellbeing Account Creation: In order to use TELUS Health Wellbeing, you will need to download the TELUS Health Wellbeing App and create an account by providing your first and last name, email address and a password that you select. We may collect the following information at the time of registration in order to validate your eligibility for services in the App, based on your group benefit program:

- Email address,
- Department or similar details

Once you have created an account, you will have access to the services on the App. Creating an account is required to enable TELUS Health Wellbeing to provide you with accurate and relevant information based on your Personal Information and User Records.

Authentication: When your account is created, your device will be issued an access token, a randomly generated value, unique to your email address. The access token is stored on your devices' secure storage (i.e., iOS keychain or Android keystore). This access token will allow you to use biometric authentication or device password to access the TELUS Health Wellbeing App. The App will retrieve tokens saved in your devices' secure storage to authenticate your access. These tokens may also be used to register for other TELUS Health services, where you may be eligible based on your group benefit program.

To provide health-engagement and well-being services to you

Well-being services: You can choose to provide information about your current health and well-being, including vital stats such as height, weight, waist circumference, heart rate, blood pressure, medical history, family health history and lifestyle habits. Based on the information you provide the platform may present you with recommendations and actions to complete to improve your wellbeing. The platform does not provide medical advice.

Health-engagement services: Based on your activity on the platform a User Record may be created. User Records may be used to personalize your experience within the platform to support proactive and preventive health actions.

Activity tracking records from personal connected devices: You may choose to connect personal connected devices (such as a FitBit or Apple Watch) that provide activity tracking data for an overall improved user experience. These connected devices may contain user record data allowing you to automatically track wellness activity on the platform. Through each third party service provider, you can choose what information is shared.

Service Messages: We may contact you by email or push notification to provide you with helpful information related to our Health-engagement and Wellbeing services. We may use your interactions with the app to provide messages based on your interests. For example, if you view articles or engage in activities or express interest in events. You can turn off push notifications at any time in your device settings.

Technical Support: In certain circumstances, Personal Information may be required by or accessible to technical support staff in order to resolve technical issues. Where possible, our support team will resolve issues without viewing Personal Information.

To develop, enhance or market our products and services

Developing and enhancing our services: We analyze actions you take on the TELUS Health Wellbeing App to enhance your experience and better understand what care programs or services to provide. This information is not identifiable. For example, if you select a specific service on our platform, a user event is captured under a unique randomly generated identifier that is not linked back to you. This helps us determine successful implementations of features and guides us towards improvements.

Sending marketing communications: Your TELUS Health Wellbeing contact details, including your name and email address, may be used so that TELUS Health Wellbeing or the TELUS Family can provide you with health-related news and offers. These communications may be tailored based on data in your account profile and app activity.

You can opt out of receiving marketing messages from us at any time by following the unsubscribe instructions included in each of our marketing messages or by contacting us at help@vc.telushealth.com.

Invite you to provide feedback on your experience on the platform: Your name and email address may be used by us to contact you regarding your experience when using the Services. You may also be prompted to provide rating or feedback within the platform. These communications may be tailored based on information in your account profile and User Record.

To maintain the security and/or functionality of the TELUS Health Wellbeing Website and App

Visiting the TELUS Health Wellbeing Website: In general, you can visit our website without telling us who you are or submitting any Personal Information. However, we collect the IP (Internet protocol) addresses of all visitors to our website and other related information such as device type, page requests, browser type, operating system and average time spent on our website. We use this information to help us understand our website activity and to monitor and improve our website. We also use your Internet protocol address (IP address) and device type to help ensure a secure experience and detect anomalous behaviour.

Device Information: As with many applications, certain limited technical data is required for the TELUS Health Wellbeing app to function on your device. The information we collect includes information about your device and operating system, such as the type of device hardware and operating system, unique device identifier, IP address, language settings, and the date and time the app accesses our servers. This information is used to deliver content appropriate for your device's capabilities, to deliver push notifications and to help ensure a secure experience and detect anomalous behaviour in order to protect Personal Information from unauthorized access. In addition, in the event the TELUS Health Wellbeing app crashes on your mobile device, we may receive information about your mobile device model software version and device carrier, which allows us to identify and fix bugs and otherwise improve the performance of the TELUS Health Wellbeing app.

App Usage Information: We may collect and analyze information about the actions you take on the TELUS Health Wellbeing app to enhance your experience and better understand what care programs or services to provide. For example, time of use and amount of time spent on the app.

Cookies: We use cookies to remember your preferences and to authenticate you. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept first-party cookies used for the purpose of authentication, you will not be able to login to the TELUS Health Wellbeing platform. Please see our [Cookies Notice](#) for information on our use of Cookies.

De-Identification and Aggregation

De-Identifying and Aggregating Information: We may de-identify or aggregate your Personal Information, including information in your User Record, such that it cannot reasonably be associated with you, for the following purposes:

- (i) To protect your privacy and the security of your Personal Information;
- (ii) To conduct analytics and/or research in a privacy protective manner to:
 - a) better understand and improve TELUS Health Wellbeing and our service offerings;
 - b) To operate and expand our business opportunities; and
 - c) To improve health outcomes.

For example, we may use de-identified data internally to develop or enhance TELUS Health Wellbeing and our service offerings using artificial intelligence, machine learning or deep learning.

We may share such aggregated de-identified information or insights with our clients and third party service providers to assist in research, planning, or product and service development.

Sharing and Disclosure of Personal Information

Here's the summary:

We will not disclose your Personal Information for any purpose other than what has been outlined in this Privacy Commitment or as permitted under applicable law, unless we obtain your express consent. We disclose only the limited amount of Personal Information necessary to meet these purposes.

We do not sell your Personal Information to any third parties.

We may share your Personal Information with our service providers who are contracted to perform services or functions on our behalf where they require the information to assist us in serving you. We use contractual controls to protect this information and limit its use to what is necessary for the service provider to perform the service.

Here's the detail:

We may share or disclose Personal Information for the following purposes:

Service Providers: We may share Personal Information with the TELUS Family, our suppliers, agents or other organizations or individuals who are contracted to perform services or functions on our behalf, where they require the information to assist us in serving you. For example, we may use service providers to process payments, host our website, facilitate consultations with Non-healthcare Professionals, and store and dispose of information on our behalf. We strive to minimize the amount of Personal Information that we share with our service providers and partners and require that it not be used for any other purpose.

If you choose to have a consultation with a Non-healthcare Professional, we will provide your name and information about the general purpose of your consultation to the Non-healthcare Professional so that they can provide services to you.

Reporting to Employers/Benefits Providers: If your access to TELUS Health Wellbeing is facilitated through your employer or benefits provider, we may provide general information about the status of your account to them. De-identified information

may be shared with your employer at an aggregated level. For example, we may provide your employer with de-identified information about program usage, statistics and feedback.

To administer your incentives: TELUS Health Wellbeing app may share with your Program Provider, or third parties authorized by your employer or benefits provider, the necessary information for them to administer your incentives, to manage your account and to otherwise act as administrator. TELUS Health Wellbeing will share information directly with Your Program Provider only to the extent needed for the administration of your incentives, such as calculation of health plan premium discounts, applicable taxation, reward redemption, or other arrangements for which such information is relevant. Where we reasonably believe that there may be a risk of harm to you or someone else and we reasonably believe that your Program Provider is best placed to act, we may also share such information with your Program Provider. We may also share aggregated or de-identified information with a third party to your Program Provider at the request of your Program Provider.

Disclosures required or permitted by law or regulation: We may disclose Personal Information to the extent necessary where we are required or permitted under applicable law, such as in the event of an emergency that threatens the life, health or security of an individual. We or our service providers will also share Personal Information with law enforcement, courts, other government agencies or other parties if we are required to do so to meet our legal and regulatory requirements in the jurisdictions in which we or our service providers operate; for example, we are required to provide records to law enforcement in response to a valid court order.

Third Party Links: TELUS Health Wellbeing may contain links to other websites or platforms that TELUS Health Wellbeing does not own or operate. Also, links to TELUS Health Wellbeing may be featured on third party websites or platforms as advertisements. Except as provided in this Privacy Commitment, we will not provide Information to these third parties without consent. We provide links to third party websites or platforms as a convenience to our users. These links are not intended as an endorsement of, or referral to, the linked websites or platforms. The linked websites or platforms have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites or platforms, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites or platforms may collect, use, disclose, secure and otherwise handle Personal Information.

You may share information with other App users from your employer or benefits provider:

Sharing Information with other App users: The App allows you to engage in social activity and share your Personal Information and User Record information, including activity tracked on the platform, badges, groups or events and engage with information shared by other App users from your employer or benefits provider. It is important to know that you are responsible for choosing what information you share with other App users and that we do not have control.

Access, Corrections, and Accuracy of your Personal Information

Here's the summary:

You can request access to or correction of your Personal Information by contacting us at help.wellbeing@vc.telushealth.com.

We rely on you to keep your Personal Information up to date and accurate so that we can serve you.

Here's the detail:

You may request access and corrections to the Personal Information we hold about you at any time, subject to limited exceptions. Upon written request, we will also provide you with a list of individuals or entities (e.g. third party service providers) with whom we have shared or disclosed your Personal Information, if applicable. Please contact us directly on the TELUS Health Wellbeing platform (by clicking get help in the setting section) or by email at help.wellbeing@vc.telushealth.com for additional information.

We rely on you to ensure that the Personal Information on the TELUS Health Wellbeing platform is accurate, complete and up-to-date. You are welcome to make changes or request deletions or corrections to Personal Information on TELUS Health Wellbeing at any time by updating your account profile on the TELUS Health Wellbeing App or by contacting us at help.wellbeing@vc.telushealth.com.

For a copy of your Personal Information, please contact us on the TELUS Wellbeing platform (by clicking get help in the settings section) or by sending us an email at help.wellbeing@vc.telushealth.com. We will take reasonable steps to verify your identity

before granting access or making corrections. In addition, your right to access or correct your Personal Information is subject to certain legal restrictions.

To request access to Personal Information held by a Non-healthcare Professional who provided a consultation to you, please contact the Non-healthcare Professional directly.

Storage and Location of your Personal Information

Here's the summary:

Your Personal Information is stored in Canada and cannot be accessed from outside Canada, with only a few limited exceptions.

Here's the detail:

Your Personal Information is encrypted in transit and at rest, and stored on a third party cloud platform with data centers physically located in Canada. As with most cloud platforms, in order to ensure availability, redundancy, and reliability, third parties operating these cloud platforms may temporarily view, access, use, or transfer information stored in these data centers outside of Canada as necessary for installing, implementing, maintaining, repairing, troubleshooting, or upgrading their cloud platform. To ensure this information is safeguarded at all times, we make sure that any information stored on these data centers are always encrypted in transit and at rest.

We also use service providers who may access or store Personal Information in the United States or other jurisdictions. For example, your email address may be transferred through the US when we use our service providers to deliver email from the platform, collect feedback or other analytical data. We do not have control over what systems they use and where this data may be stored but we have contractual controls in place to protect this information and limit its use to what is necessary for them to perform the service.

Retention

Here's the summary:

We retain Personal Information only for as long as necessary to fulfil the purposes described in this Privacy Commitment or as required to meet legal or regulatory requirements.

Here's the detail:

We retain Personal Information only for as long as necessary to fulfil the purposes described in this Privacy Commitment or as required to meet legal or regulatory requirements. We may also create and retain de-identified information, and continue to use this information in accordance with this Privacy Commitment.

At your request, we will delete your Personal Information unless we are required to retain it to meet our legal or regulatory obligations.

Safeguards

Here's the summary:

We have implemented a comprehensive information security program.

Here's the detail:

We understand that data security is a critical priority and we are committed to safeguarding the Personal Information in our custody and control. We have implemented a comprehensive information security program that includes written policies and procedures, and security controls, as well as reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, loss, modification, and disclosure of Personal Information in our custody or control.

Our team members must complete privacy and security training before they have access to any Personal Information, and must complete annual privacy and security training for ongoing access to Personal Information.

TELUS Health Wellbeing ensures that the security policies, procedures, and controls meet industry and TELUS best practices and are regularly tested.

Please keep in mind that no internet or email transmission is ever fully secure or error free and no security system is impenetrable. We cannot fully guarantee the confidentiality of any information that you provide to us but we can assure you that we will use reasonable and appropriate security controls.

It is important for you to play an active role in the protection and safeguarding of your Personal Information. It's important to guard your privacy when you are online. If TELUS Health Wellbeing contains links to other websites, this Privacy Commitment does not govern those websites. You should read their privacy policies and make an informed decision about whether you want to use those websites or their services.

Changes to this Privacy Commitment

Here's the summary:

We may make changes to this notice and we will notify you of the changes to our information practices.

Here's the detail:

This Privacy Commitment may be updated from time to time to reflect changes to our practices. Any notices regarding modifications to this Privacy Commitment will be in written form and provided to you on the TELUS Health Wellbeing platform and on our website.

If any changes to this Privacy Commitment are significant, we will provide a more prominent notice (including email notification, if appropriate).

We encourage you to periodically review our Privacy Commitment for the latest information on our privacy practices and to contact us if you have any questions or concerns.

Questions, Complaints, and Contact

Here's the summary:

You can always reach us at help.wellbeing@vc.telushealth.com if you have privacy questions, concerns or complaints.

Here's the detail:

Please contact us at help.wellbeing@vc.telushealth.com or the address below if:

- you have any questions related to the collection, use and disclosure of your Personal Information;

- you need to report any privacy or security violations, including any suspected or actual unauthorized access, use, disclosure or loss of Personal Information;
- you wish to withdraw your consent to the collection, use or disclosure of Personal Information;
- you have any questions or comments about this Privacy Commitment; or
- you otherwise have a question or complaint about the manner in which we or our service providers treat your Personal Information, including our policies and practices with respect to the use of service providers outside Canada.

Contact Address:

TELUS Health Virtual Care
c/o Privacy Officer
25 York Street; Floor 30
Toronto, ON
M5J 2V5

If you wish to access, update, and/or correct inaccuracies in your Personal Information, please contact us at help.wellbeing@vc.telushealth.com.

If you have concerns with our Privacy Commitment or privacy practices, we encourage you to first bring your concerns to us at help.wellbeing@vc.telushealth.com. You may also seek advice from the Office of the Privacy Commissioner of Canada or the provincial Privacy Commissioner having jurisdiction, and, if appropriate, file a written complaint with the Commissioner's office.

To contact the applicable privacy commissioner, please visit the following websites:

Alberta: www.oipc.ab.ca

British Columbia: www.oipc.bc.ca

Manitoba: www.ombudsman.mb.ca

New Brunswick: <https://oic-bci.ca/>

Newfoundland and Labrador: www.oipc.nl.ca

Northwest Territories: <https://atipp-nt.ca/>

Nova Scotia: <https://oipc.novascotia.ca/>

Nunavut: <https://atipp-nu.ca/>

Ontario: www.ipc.on.ca

Prince Edward Island: <https://www.assembly.pe.ca/>

Québec: www.cai.gouv.qc.ca

Saskatchewan: <https://oipc.sk.ca/>

Yukon: <https://www.ombudsman.yk.ca/>

Federal: <https://www.priv.gc.ca/>