

TELUS Health Care Centres Portal Privacy Statement

Effective as of May 30, 2022.

TELUS Health Care Centres Portal is a mobile application that enables individuals to access their information, the ability to book appointments online and securely message healthcare professionals for an overall improved patient experience.

TELUS Health Care Centres provides the Portal to you to assist you with managing your health.

We are passionate about the protection of your Personal Information and Personal Health Information and are committed to respecting your privacy.

TELUS Health Care Centres Portal policy to protect your privacy

Here's the summary:

By accessing or using the Portal, you understand that your information will be treated in accordance with this TELUS Health Care Centres Portal Privacy Statement ("Privacy Statement") and the TELUS Health Care Centres Privacy Commitment ("Privacy Commitment"). Our Privacy Statement, 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 or Personal Health Information in the ways identified in this Privacy Statement, you may choose not to use the Portal. If you choose to not use the Portal we will use alternative means to provide you with access to your medical records and will rely on telephone conversations to communicate with you in lieu of secure messaging and e-booking.

Here's the detail:

We have developed this Privacy Statement to provide you with specific details about how TELUS Health Care Centres collects, uses, discloses and stores your Personal Information, which includes your Personal Health Information, when you use the mobile

TELUS Health Care Centres Patient Portal app (the “Portal”) . For details about how we handle your data and respect your privacy when you use our Services or otherwise interact with us, please see our [TELUS Health Care Centres Privacy Commitment](#).

The Privacy Statement 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 Statement carefully. By accessing or using the Portal, you consent to the collection, use, disclosure and storage of Personal Information in accordance with this Privacy Statement.

Definitions

The following definitions apply to this Statement. For terms not defined, refer to the terms in the TELUS Health Care Centres [Privacy Commitment](#)

You - An individual who uses, or registers to use, TELUS Health Care Centres Portal.

Personal Health Information - Any Personal Information regulated under applicable health privacy legislation in the provinces and territories in which we operate, including information that relates to an individual’s physical or mental health and healthcare including health history, the provision of healthcare to the individual, payments or eligibility for healthcare, healthcare provider, substitute decision-maker, health card number or other healthcare-related personal identification numbers, or any other information that is collected in the course of providing health services to the individual, including information contained in your Medical Record.

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 Care Centres Portal account profile and Personal Health Information.

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

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

TELUS Health Care Centres - In this TELUS Health Care Centres Portal Privacy Statement, the words "we", "us", "our" or "TELUS" refer to TELUS Health Care Centres Inc.

Accountability

Here's the summary:

In most provinces and territories, TELUS Health Care Centres has overall responsibility for protecting the privacy of your Personal Information and we are directly accountable to you.

Here's the detail:

Enabling Access to Personal Health Information, Secure Messaging and Appointment Booking: Enabling access to your personal health information, message exchange with Healthcare Practitioners and appointment booking for in-clinic services are available for some clinics.

With the exception of Alberta, TELUS Health Care Centres has overall responsibility for protecting your Personal Information, when providing you with the Portal and we are directly accountable to you.

In Alberta your Healthcare Practitioners who are designated as 'custodians' under Alberta's Health Information Act, have overall responsibility for the privacy of your Medical Records and TELUS Health Care Centres collects, uses, and discloses Personal Health Information on their behalf and otherwise assists them with their responsibilities under the applicable legislation.

Consent

Here's the summary:

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

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

Here's the detail:

When you use TELUS Health Care Centres Portal, you consent to our collection, use, disclosure, and storage of your Personal Information in accordance with this Privacy Statement.

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 certain services, products and functionalities.

If you want to delete your account, we may retain certain information to meet our legal or regulatory obligations; for example, Personal Information used to create your Portal account forms part of your Medical Record and 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 Statement, we will seek additional consent from you.

Individuals under the age of majority in their jurisdiction of residence may not create an account on TELUS Health Care Centres Portal at this time, nor can any one else on their behalf.

Collection and Use of Personal Information

Here's the summary:

We collect only the Personal Information required for us to provide you with the Portal and improve the security and functionality of the Portal.

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

We also collect other information from you as you use the TELUS Health Care Centres Portal:

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

Here's the detail:

TELUS Health Care Centres provides you with the Portal to assist you in managing your health. By creating an account for the Portal, you will have the ability to securely message team members, including Healthcare Practitioners within the Portal, and have access to related healthcare and administrative support services (i.e., appointment booking, view summary health report and laboratory results, etc.), as well as other tools to help you manage your healthcare and well-being through the Portal.

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

To establish and maintain our relationship with you

TELUS Health Care Centres Portal Account Creation: TELUS Health Care Centres uses the email address we have associated with your Medical Record to invite you to create an account for the Portal. In order to use TELUS Health Care Centres Portal, you will need to download the TELUS Health Care Centres Portal app by clicking on the email invitation you receive. The invitation you receive contains a randomly generated value, unique to your email address we have in our system, and once redeemed by clicking on the link, your device is provided with an access token. The access token is stored on your devices' secure storage (i.e., iOS keychain or Android keystore). We do not collect additional information from you to create the account.

Creating an account is required to enable TELUS Health Care Centres Portal to provide you with accurate and relevant information based on your Personal Information.

It is important you ensure TELUS Health Care Centres has updated Personal Information, such as your email address and phone number, in order to create your account.

Authentication: Once your account is created, you may use biometric authentication or device password to access the Portal. The Portal will retrieve tokens saved in your devices' secure storage to authenticate your access.

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

In-Portal Conversations: An in Portal conversation may be initiated by you or a health team member (who may also be your Healthcare Practitioner). The conversation function is used as an alternative to email to send secure, encrypted messages between you and the clinic. These messages should not be used for emergency purposes or considered an alternative to providing or assisting in healthcare. These messages may become part of your Medical Record where your Healthcare Practitioner deems it is relevant. All messages are only available between you and TELUS Health Care Centres.

Service Messages: We may contact you by SMS or email to provide you with helpful information related to our services such as reminders that you have an appointment confirmation where you make a booking request, an unread message or your health summary report or other files are available to view. We do not include any Personal Health Information in the SMS or email message. You may update your preferences to receive SMS or email in the Portal at any time.

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 Care Centres Portal 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 in our Portal, a user event is captured under a unique randomly generated identifier that cannot be linked back to you. This helps us determine successful implementations of features and guides us towards improvements. We do not use information from your Medical Record for this purpose.

To maintain the security and/or functionality of the TELUS Health Care Centres Portal Website and App

Device Information: As with many applications, certain limited technical data is required for the TELUS Health Care Centres Portal 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 Care Centres Portal 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 Care Centres Portal app.

App Usage Information: We may collect and analyze information about the actions you take on the TELUS Health Care Centres Portal 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 Care Centres Portal. Please see our [FAQs](#) and [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, 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 the Portal and related service offerings;
 - and
 - b) To operate and expand our business opportunities.

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

Sharing and Disclosure of Personal Information

Here's the summary:

When providing the Portal to you, we recommend you only share Personal Information among your Healthcare Practitioners and others who assist in the provision of healthcare to you.

We will not disclose your Personal Information for any purpose other than what has been outlined in this Privacy Statement 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 engaged to perform services or functions on our behalf where they require the information to provide the Portal. We use 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 Personal Information for the following purposes:

Provisioning the Portal: When providing you with the Portal, we only disclose your Personal Information to and among coordinators (including your Healthcare Practitioners) already providing or assisting in the provision of healthcare to you. This enables your Healthcare Practitioners to share information from your Medical Record or to securely message you.

Service Providers: We may share Personal Information with the TELUS Family, our suppliers, agents or other organizations or individuals who are engaged 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 host the platform, build and maintain the Portal, to integrate to provide certain functionality, such as secure messaging and appointment booking and to send SMS messages for registration and reminders. 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.

Employers/Benefits Providers: If your access to the Portal is facilitated through your employer or benefits provider, we may provide general information about the non-medical status of your account to them. We will not disclose any Personal Health Information to your employer or benefits provider. 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 Portal usage and functionality engagement trends.

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 Care Centres Portal may contain links to other websites or platforms that TELUS Health Care Centres Portal does not own or operate. Also, links to TELUS Health Care Centres Portal may be featured on third party websites or platforms as advertisements. Except as provided in this Privacy Statement, 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.

Access, Corrections, and Accuracy of your Personal Information

Here's the summary:

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

You can request access to or correction of your Personal Information by contacting the clinic in which you receive care.

Here's the detail:

We rely on you to ensure that the Personal Information we have at TELUS Health Care Centres is accurate, complete and up-to-date. This information is used to provide you with the Portal. You are welcome to make changes or request deletions or corrections to Personal Information on TELUS Health Care Centres Portal at any time by contacting the clinic in which you receive care.

For Personal Information provided to you from your Medical Record (i.e., clinical notes) you may request changes or deletions or corrections to Personal Information in writing at any time by contacting the clinic in which you receive care for additional information.

The Portal enables you to access Personal Information from your Medical Record, with some exceptions.

For a copy of your Personal Information, please contact the [clinic](#) in which you receive care. 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.

Storage and Location of your Personal Information

Here's the summary:

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

Here's the detail:

Your Personal Information in the Portal is encrypted in transit and at rest, and stored in third party data centers physically located in Canada. As with most data centres, in order to ensure availability, redundancy, and reliability, third parties operating the data centre may temporarily view, access or use information stored in these data centers as necessary for installing, implementing, maintaining, repairing, troubleshooting, or upgrading their platform.

Service providers may access or store Personal Information, not including your Medical Record, in the United States or other jurisdictions. For example, your phone number may be transferred through the US when we use our service provider's SMS platform. 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 Statement 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 Statement 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 Statement.

If you choose to send a message or you make a request to book an appointment in the Portal, this information may be saved in your Medical Record. Refer to the [Privacy Commitment](#) for details on Medical Record retention.

You may request to delete your account at any time by contacting the [clinic](#) in which you receive care. Deleting your account will remove your access to the Portal, however, considering your account was created using the Personal Information associated with your Medical Record, we will retain your Personal Information in accordance with the Medical Record retention.

Service providers may continue to retain Personal Information in accordance with their retention policies, however, are still bound by our contractual obligations to limit and safeguard the Personal Information.

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. In addition to the controls described in the [Privacy Commitment](#), we have ensured that the Portal meets the standards required of our comprehensive information security program to ensure that reasonable administrative, technical and physical safeguards are applied in an effort to protect against unauthorized access, use, loss, modification, and disclosure of Personal Information in our custody or control.

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. We will use reasonable and appropriate security controls in the Portal, reflective of the sensitive nature of Personal Information, such as requiring users to authenticate when logging in to the Portal and applying session timeouts. When using the Portal, in order to limit access by unauthorized users, do not share your device PIN.

If the Personal Health Record contains links to other websites, this Privacy Statement 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 Statement

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 Statement may be updated from time to time to reflect changes to our practices. Any notices regarding modifications to this Privacy Statement will be in written form and provided to you on the TELUS Health Care Centres Portal and on our website.

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

We encourage you to periodically review our Privacy Statement 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 CareCentres.Privacy@telus.com if you have privacy questions, concerns or complaints.

Here's the detail:

Please contact us at CareCentres.Privacy@telus.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 Statement; 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 Care Centres
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 or delete your account, please contact the [clinic](#) in which you receive care.

If you have concerns with our Privacy Statement or privacy practices, we encourage you to first bring your concerns to us at CareCentres.Privacy@telus.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/>