

Telemed Privacy Policy

Telemed Innovations Inc (“**Telemed**”, “**We**”, “**Us**”) has created this Privacy Policy (“**Policy**”) in order to set out how we collect, use, and disclose personal information through the Telemed.ca Platform and related Services (as those terms are defined in our Terms of Service). Telemedmd.ca is a Patient relationship management software-as-a-service platform which allows registered CPSO doctors (“**Physicians**”) to connect, treat and provide health care consulting through OHIP and private services to patients across Ontario (“**Patients**”).

The privacy of our users is of great importance to us. By visiting our website located at www.telemedmd.ca (the “**Website**”) or using the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Policy and you hereby consent to the collection, use and disclosure of your personal information in accordance with this Policy.

1 WHAT DOES THIS POLICY COVER?

This Policy covers our collection, use and disclosure of information about identifiable individuals (“**Personal Information**”). This Policy does not apply to the practices of companies that we do not own or control. We do not knowingly collect or solicit Personal Information from anyone under the age of 18 or knowingly allow such persons to register for the Services. [If you are under the age of 18, you may not use the Services.](#) Physicians are responsible for maintaining their own privacy policies governing the collection, use and disclosure of Patient Personal Information.

It is Telemed’s policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and/or an individual’s right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada’s federal and provincial privacy laws, as applicable.

2 COLLECTION AND USE OF PERSONAL INFORMATION AND OTHER DATA

2.1 Telemed Account Information

In order to use certain aspects of the Services, users may be required to have a valid Telemed account to log in to the Platform (“**Account**”). When you register for the Services, Telemed collects Your Account username and password in order to authenticate Your Account access and provide You with access to the Services.

2.2 Patient Information

Patients will be required to provide a date of birth and residential address. In order to allow Patients to use the Services, Telemed will also collect Patient’s medical information and insurance information (collectively, “**Patient Data**”). This information is stored in the Platform, as identified through the Platform, to allow the physician to verify the Patient’s identification, bill the Patient’s insurance company and ship products ordered to the Patient.

Telemed collects the Patient’s medical history in order to allow Patient’s to keep track of consultations done and easily request medical information.

2.3 Demographic Data

All Patient Data collected by the Platform is aggregated and anonymized by Us to create aggregate statistical data (“**Statistical Data**”) which we use to provide insights to Physicians and our other clients, including age of users, patients’ average distance from pharmacies, [and](#) how frequently Patients use the Platform. The Statistical Data does not include any Personal Information.

2.4 Usage Data

Telemed may also collect certain information users of the Website and Services, such as Internet addresses, time spent logged into the Services and other usage data. This information is logged to help diagnose technical problems, and to administer our Website and Services in order to constantly improve the quality of the Service. Telemed uses the usage data that we collect to provide the Services and to continuously improve the Services.

2.5 Surveys

Telemed may collect Personal Information that our Physicians and their Patients provide in a survey prompted by Telemed and/or one of its partners, including, but not limited to, Personal Information, preferences, and medical information, for the purpose of better understanding the needs of Physicians and Patients. Telemed will share only anonymized, aggregated survey results with its partners.

2.6 Cookies

Technologies such as cookies, beacons, scripts and tags are used by us and our third party partners. These technologies are used in analyzing trends, administering the website, tracking users’ movements around the website, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis. Various browsers may offer their own management tools for removing these types of tracking technologies.

Standing alone, cookies do not identify you personally. They merely recognize your browser. Cookies come in two flavors: session and persistent-based. Session cookies exist only during an online session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you've closed your browser or turned off your computer. They include such information as a unique identifier for your browser.

Telemed uses session cookies containing encrypted information to allow the system to uniquely identify you while you are logged in. This information allows Telemed to process your online transactions and requests. Session cookies help us make sure you are who you say you are after you've logged in and are required in order to use the Service.

Telemed uses persistent cookies that only Telemed can read and use, to identify the fact that you are a Telemed user. We are especially careful about the security and confidentiality of the information stored in persistent cookies. Users who disable their web browser’s ability to accept cookies will be able to browse our Website but may not be able to use all features of our Service.

Our third party partners also employ clear gifs (a.k.a. Web Beacons/Web Bugs), images, and scripts that help them better manage content on our site. We do not tie the information gathered to our Patient Data.

3 STORAGE LOCATION AND TRANSFER OF PERSONAL INFORMATION

Telemed stores its data, including Personal Information, on servers located in Canada. By submitting information, you agree to this transfer, storing or processing of your Personal Information in Canada. You acknowledge and agree that your Personal Information may be accessible to law enforcement and governmental agencies in Canada under lawful access regimes or court order.

4 DISCLOSURE OF PERSONAL INFORMATION WITH THIRD PARTIES

4.1 Disclosure of Statistical Data

Telemed discloses aggregate Statistical Data to its partners and Physicians, and other third parties, who may use the data for business purposes. This information does not include any Personal Information or otherwise identify any individual Patients.

4.2 Service Providers and Business Partners

We may from time to time employ other companies and people to perform tasks on our behalf and need to share Patient Data with them to provide the Services to you. Unless we tell you differently, such third parties do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. This includes third party companies and individuals employed by us to facilitate our Services, including the provision of maintenance services, database management, Web analytics and general improvement of the Services, and businesses who engage our Services (to the extent provided for above).

4.3 Business Transfers

If we (or substantially all of our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information may be made available or otherwise transferred to the new controlling entity, where permitted under applicable law.

4.4 With Your Consent

If we need to use or disclose any Personal Information in a way not identified in this Privacy Policy, we will notify you and/or obtain your express consent as required under applicable privacy laws. By using this Service, you consent to the collection, use, and disclosure of Personal Information as set out in this Privacy Policy and the Terms of Use.

5 RETENTION

We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. Generally, Telemed uses reasonable efforts to delete Personal Information within 30 days of a user deleting their Account. However, we may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained Personal Information will remain subject to the terms of this Privacy Policy.

6 ACCESS, CORRECTION AND ACCURACY

You have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that information. Upon receipt of your written request, we will provide you with a copy of your Personal Information, although in certain limited circumstances, and as permitted under law, we may not be able to make all relevant information available to you, such as where that information also pertains to another user. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep your Personal Information accurate and up to date, and we will provide you with mechanisms to update, correct, delete or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting us by e-mail using the contact information set out below. In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide products or services to, or acquire products or services from, you. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to the e-mail below.

Telemed endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while Telemed strives to protect your personal information, we cannot warrant the security of any information you transmit to us, and you do so at your own risk. Once this website receives your transmission, we make commercially reasonable efforts to ensure its security on our systems.

7 THIRD PARTY WEBSITES

Our website may contain links to other websites that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. Telemed is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

8 CHANGES TO THIS POLICY

We may amend this Policy from time to time. Use of Personal Information we collect is subject to the Policy in effect at the time such information is collected, used or disclosed. If we make material changes or changes in the way we use Personal Information, we will notify you by posting an announcement on our Website or Services or sending you an email prior to the change becoming effective. You are bound by any changes to the Policy when you use the Website after such changes have been first posted.

9 ADDITIONAL INFORMATION

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples; therefore where the word “including” is used, it shall mean “including without limitation”.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Telemed any obligations outside of, or in addition to, any rights or obligations imposed by Canada’s federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada’s federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

Questions regarding this Policy or Telemed’s privacy practices should be directed to **management@telememd.ca**

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