

Privacy Policy

Key Elements of this Privacy Policy

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See:

1. Our Commitment to Privacy

First Canadian Benefits Health Network and its affiliates have established and maintain a network of healthcare and related service providers, who have committed contractually to providing their respective services at a reduced cost as an alternative delivery care model to help sustain and maintain health benefits to individuals and payors in Canada.

Respecting the confidentiality of your personal information is of the utmost importance to us at First Canadian Benefits. This Privacy Policy documents our on-going commitment to you.

2. Scope of Policy

During the course of providing our services in relation to our health network, we will collect, record, sort, process, transmit, and otherwise handle personal information. Those activities are subject to applicable privacy laws, including the Personal Information Protection and Electronic Documents Act (Canada) or its successor legislation. This Policy applies to our collection, use and disclosure of personal information. This Policy does not impose any limits on the collection, use or disclosure of business contact information or certain publicly available information.

3. Updates

We may update this Policy from time to time to ensure ongoing compliance with applicable laws and for any other purpose that we deem reasonably necessary. Any changes will be effective immediately upon

the posting of the revised policy on our site. We encourage you to periodically review this page for the latest information on our privacy practices. You can tell if the policy has changed by checking the revision date that appears at the top of this policy. Where required by applicable law, we may need to ask you to confirm your consent to the processing of your personal information. Otherwise, your continued access to or use of our services constitutes your acknowledgment and acceptance of the changes.

4. Accountability

We have designated a Privacy Officer who is responsible for our compliance with this Policy. The Privacy Officer may be contacted as described below.

5. Information Collected

We may collect some or all of the following information directly from you, or from your health care providers, other insurance or reinsurance companies, or administrators of government benefits or other benefit programs in which you participate:

Name

Date of Birth

Gender

Contact information: including mailing address, email address, telephone, and fax

Treatment and claim history

Dependent name, date of birth, and treatment and claim history

IP Address

Unique number (for Dentist/Health care provider only)

Unique FCB Health Network participant number

FCB Health Network account status

FCB Health Network registration date and method

We or our service providers that help us maintain and operate our website and applications may also automatically collect the following information relating to your access to and use of our website and applications through cookies, web beacons, and other technologies: your domain name; your browser type and operating system; your type of computer; pages you view; links you click; your IP address; the length of time you visit or use our site; and the referring URL, or the webpage that led you to our site.

We may use various technological methods to track the patterns of users accessing and using our website and applications, including the following methods:

- **Cookies:** Cookies are small pieces of information that are stored by your browser on your computer or mobile device. We use cookies to optimize your online experience. Cookies in themselves do not identify an individual user, just the computer or device used. The website assigns a unique ID number to each visitor, which allows the website to recognize repeat users, track patterns, and better serve you when you return to the site. You may be able to set your computers or devices to

accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. If you set your browser to not to accept cookies, you may not be able to take advantage of the full features of our site.

- **Web Beacons:** Web beacons are small pieces of data that are embedded in images on the pages of websites. We may use these technical methods to analyze the traffic patterns on our site, such as the frequency with which our users visit various parts of our site. These technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf. We may also use these technical methods in HTML e-mails that we send to determine whether you have opened those e-mails or clicked on links in the e-mails. The information from use of these technical methods may be collected in a form that is not personally identifying.
- **Third-Party Analytics:** We may use automated devices and applications, such as Google Analytics, to evaluate usage of our site and our apps. We also may use other analytic means to evaluate our services. We use these tools to help us improve our services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. You may opt-out of Google Analytics by downloading and installing the Google Analytics Opt-Out Add-on for your web browser.

6. Purposes

When collecting personal information, we will state the purpose of collection and will provide, on request, contact information for our Privacy Officer who can answer questions about the collection.

We collect, use and disclose your personal information for the following purposes:

- to operate, maintain and improve our website and services, and to provide and administer products and services you request, and to disclose the information for any purpose related to the provision of requested products and services;
- to conduct analysis of and improve our product and services;
- to authenticate your identity;
- to provide personal information to third-party suppliers of products and services (as discussed in more detail below);
- to manage or transfer our assets or liabilities, for example, in the case of an acquisition or merger, the provision of security for a credit facility or the change of a supplier of products or services;
- to maintain accurate customer records;
- to protect us, yourself and others from fraud and error and to safeguard our business interests;
- to provide reports to credit bureaus;
- to collect debts owed to us;
- to comply with legal and regulatory requirements; and
- to distribute to third parties including financial institutions, payment processors, lawyers, financial institutions and government licensing bodies for any of the above purposes.

The collections, uses and disclosures listed above are a reasonably necessary part of your relationship with us.

When your personal information is to be used for a purpose not previously identified, we will disclose that the new purpose to you before such use, and we will seek your consent unless the use is authorized or required by law.

7. Disclosures and Transfers of Personal Information

We will not share personal information we collect from you with any third party, except as indicated in this Privacy Policy or as permitted or required by law.

Business Partners: We may share your information with our partners (such as health care providers, other insurance or reinsurance companies, administrators of government benefits or other benefit programs) to provide you with services you have requested from us.

Service Providers: We may retain agents, subcontractors or service providers from time to time in relation to our business or the products or services that we provide. These service providers may include IT and network providers, payment processors, survey providers, advertising agencies, and customer service agencies. If we require a service provider to deal with your personal information, we will take reasonable steps to ensure that the service provider adheres to privacy procedures and will keep your personal information confidential. We will not provide more information than is necessary to the service provider and will ensure that the information is returned or destroyed once the purpose for which it was given is filled.

Business Transfers: If we or our affiliates are or may be acquired by, merged with, or invested in by another company, or if any of our assets are or may be transferred to another entity, whether as part of a bankruptcy, insolvency proceeding or otherwise, we may transfer personal information to the other entity. We may also share certain personal information as necessary before the completion of such a transfer, such as to lenders, auditors, and third-party advisors, including lawyers and consultants, as part of due diligence or as necessary to plan for and carry out the transfer.

Compliance and legal obligations: We may disclose personal information to third parties to comply with our legal and compliance obligations and to respond to legal process. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement. This may include law enforcement, government or regulatory bodies, or other lawful authorities, as required by law or legal process.

Security and protection of rights: We may also disclose personal information to other third parties where we believe doing so is necessary to protect the Services, our rights and property, or the rights, property and safety of others. For example, we may disclose personal information in order to (i) prevent, detect, investigate and respond to fraud, unauthorized activities and access, illegal activities, and misuse of the Services, (ii) situations involving potential threats to the health, safety or legal rights of any person or third party, or (iii) enforce, and detect, investigate and take action in response to violations of, our Terms of Service. We may also disclose information, including personal information, related to litigation and other legal claims or proceedings in which we are involved.

Important Exceptions: We may disclose your personal information to a third party without your consent if permitted or required by applicable law. We may also disclose your personal information, in accordance with applicable law, in connection with a corporate re-organization, a merger or amalgamation with another entity, or a sale of all or a substantial portion of our assets provided that the disclosed information continues to be used solely for the purposes permitted by this privacy policy by the entity acquiring the information.

8. Cross-Border Transfers

Your personal information that we collect may be processed and stored outside of your jurisdiction of residence (including outside of Canada) but only in relation to the purposes set out in this Policy and in accordance with applicable laws, including laws related to the transfer of your personal information outside of your jurisdiction. As a result, the governments, courts or law enforcement or regulatory agencies in foreign jurisdictions may be able to obtain disclosure of that personal information through the laws of the foreign jurisdiction.

9. Consent

We will obtain your consent to collect, use or disclose personal information except where we are authorized or required by law to do so without consent. Providing us with your personal information is always your choice. However, your decision not to provide certain information may limit our ability to provide you with our products or services. We will not require you to consent to the collection, use, or disclosure of information as a condition to the supply of a product or service, except as required to be able to supply the product or service.

Your consent can be express, implied or given through an authorized representative. Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify us that you do not wish your personal information collected, used or disclosed for various purposes after you have received notice of those purposes) or otherwise.

You may withdraw consent at any time, subject to legal, contractual and other restrictions, provided that you give us reasonable notice of your withdrawal of consent. If you notify us that you withdraw consent, we will inform you of the likely consequences of that withdrawal of consent, which may include our inability to provide certain products or services for which that information is necessary.

10. Limits on Collection of Personal Information

We will not collect personal information indiscriminately but will limit collection of personal information to that which is reasonable and necessary. We will also collect personal information as authorized by law.

11. Limits for Using, Disclosing and Retaining Personal Information

We will only use or disclose your personal information for the purposes set out above and as authorized by law.

We will keep personal information used to make a decision affecting you for at least one year after using it to make the decision.

We will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for a legal or business purpose.

12. Access to personal information

You have a right to access your personal information that we hold.

Upon written request and authentication of identity, we will provide you your personal information under our control. We will also give you information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed. We may charge you a reasonable fee for doing so.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

In some situations, we may not be able to provide access to certain personal information (e.g., if disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or where disclosure of the information would reveal confidential commercial information that could harm our competitive position). We may also be prevented by law from providing access to certain personal information.

If we refuse an access request, we will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

13. Accuracy

We will make a reasonable effort to ensure that personal information we are using or disclosing is accurate and complete.

If you demonstrate the inaccuracy or incompleteness of personal information, we will amend the information as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, we will annotate the personal information under our control with a note that the correction was requested but not made.

14. Security

We protect personal information using physical, technological and organizational safeguards. We regularly review our practices to ensure they align with reasonable industry practices appropriate to the level of sensitivity to safeguard personal information against loss or theft, unauthorized access, alteration or disclosure.

We will take reasonable measures, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services.

However, no method of transmission over the Internet, or method of electronic storage, is completely secure; as such, despite our safeguards and protocols, we cannot fully guarantee the security of your personal information and you should always exercise caution when disclosing personal information over the Internet.

15. Website Security

Because we value your security, our website features SSL with a digital certificate to enforce a minimum of 128-bit encryption.

16. Third-Party Links

Our website may have other third party links, that may provide related and helpful information to the user. Be advised we do not control or operate these sites and are not responsible for them. We recommend that you review their privacy policies before sharing any personal information.

17. Further information and complaints

If you require any further information about the privacy policy or have a concern/complain regarding the security of your personal information, please contact:

Chief Privacy Officer

First Canadian Benefits Health Network

Privacy Department

421 Bloor Street East

Suite #206,

Toronto, ON

M4W 3T1

or 416-929-4685