

CORIGAN

PRIVACY POLICY

This Privacy Policy describes how We, Bluewater Promotions Inc. (“**We**”, “**Us**”, “**Our**” and “**BPI**”), collect, use, disclose, retain, protect and dispose of Your personal information in Our custody and control when You use Our website, Our applications and Our services (collectively, the “**Services**”). By providing Us with Your personal information, each user of Our Services (“**You**” and “**Your**”) agrees to Our collection, use and disclosure of Your personal information in accordance with this Privacy Policy. This Privacy Policy forms part of the CORIGAN [Terms and Conditions for Offices and Providers](#) and the CORIGAN [Terms and Conditions for Patients](#) (collectively, the “**Terms and Conditions**”) and should be read together with those Terms and Conditions. Unless otherwise defined in this Privacy Policy, all capitalized terms contained herein have the meaning ascribed to them in the Terms and Conditions. You are deemed to accept this Privacy Policy by agreeing to its terms at the time You register to access and use CORIGAN.

1. MEANING OF “PERSONAL INFORMATION”

1.1 Meaning of “Personal Information”. In this Privacy Policy, the term “personal information” means:

- (a) personal information as such term is defined in the *Personal Information Protection and Electronic Documents Act* (Canada); and
- (b) personal health information as such term is defined in the *Personal Health Information Protection Act* (Ontario).

Personal information includes information such as contact information, name, address, phone number, email address, gender, data of birth, health-related information, medical and health history, medical records, prescription information, health card number.

2. APPLICATION

2.1 Registered Users. This Privacy Policy does not apply to the collection, use, retention, disposal and protection of Registered Patients’ personal health information by Registered Users. Registered Users are subject to specific privacy legislation and professional requirements that govern their management of personal information in the course of providing care through CORIGAN. Registered Users are accountable for Registered Patient’s personal health information that We process on their behalf. Registered Patients with questions about how their personal health information is handled by Registered Users and Registered Offices should contact their Registered Office directly.

2.2 Employees’ Personal Information. This Privacy Policy does not apply in respect of Our employees’ personal information that is collected, used and disclosed in connection with Our employment relationships.

2.3 De-identified Data. This Privacy Policy does not apply to data that has been collected in respect of which all personal identifiers have been removed such that the information could not reasonably be used to identify the individual. We may use de-identified information for statistical analysis and other research purposes. For the avoidance of doubt, de-identified data is not personal information under this Privacy Policy.

3. PERSONAL INFORMATION COLLECTION

3.1 General. We collect and use personal information only for the purposes stated in this Privacy Policy or for such purposes to which You may otherwise consent. We only collect personal information if non-identifying data will not suffice for Our purposes. You can always choose not to disclose Your personal information, but this may make it impossible for Us to provide You with the Services or any part of them. If You provide Us with personal information relating to a third party We will assume that You have obtained all necessary consents from the third party to provide their personal information to Us for the purposes described in this Privacy Policy.

3.2 Purposes for Collection. We collect personal information for the purpose of registering You for the Services, providing information and Services to You, and allowing Registered Patients and Registered Users to communicate with each other via CORIGAN. We may also request that You provide additional information that We may use to improve Our business and the Services We provide. Providing Us this information is optional.

3.3 Methods of Collection. We collect (a) personal information such as Your name, address, mobile telephone number, email address, medical and health history and other information that You provide to Us, and/or (b) information on Your CORIGAN account Personal information may be collected in a number of ways, including in person, over the phone, by mail, over the Internet, and from third parties who You have authorized to disclose personal information to Us.

3.4 Access to Personal Information. We make every reasonable effort to keep Your personal information as accurate, complete and up-to-date as necessary. If desired, You may verify the accuracy and completeness of your personal information in Our records. Registered Patients may update and edit any of their personal information except personal information that a Registered Provider has viewed or created during consultation. Registered Patients should contact the applicable Registered Provider to access or request the correction of personal information that the Registered Provider holds in their notes on CORIGAN or their medical records.

4. USE AND DISCLOSURE OF PERSONAL INFORMATION

4.1 General. We use and disclose personal information:

- (a) for the purposes described above under Article 3; and
- (b) to help Us better understand Your needs, to improve the Services and for any additional purposes for which We have obtained your consent.

4.2 Our Personnel. In order to provide the Services to You, We may disclose Your personal information to Our authorized employees and personnel who need the information for legitimate business reasons (“**Our Personnel**”). We require all Our Personnel to abide by Our privacy standards. Our Personnel are prohibited from accessing or disclosing personal information without authorization. Our Personnel are required to maintain the confidentiality of personal information at all times.

4.3 Communicating with You. We may use Your contact information for the purpose of communicating with You about our Services. You may opt-out or unsubscribe from

optional communications such as those that market Our services or inform You about our events.

4.4 Disclosure of Personal Information to Third Parties. We do not disclose personal information to third parties except as contemplated in this Privacy Policy or as otherwise permitted or required by law. In some instances, such as a legal proceeding or court order, We may be required to disclose Your personal information to authorities. We only disclose the information specifically requested and We take precautions to satisfy Ourselves that the authorities that are making the disclosure request have legitimate grounds to do so. Your personal information may be disclosed in situations where We are legally permitted to do so, such as in the course of employing reasonable and legal methods to enforce Our rights or to investigate suspicion of unlawful activities. We may release certain personal information when We believe that such release is reasonably necessary to protect the rights, property and safety of Ourselves and others.

5. BUSINESS TRANSACTIONS

5.1 Business Transactions. We may use and disclose Your personal Information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of Our business or assets for the purposes of evaluating, and allowing third parties to evaluate, and performing the proposed transaction. These purposes include, for example, permitting such third parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets. Our successors and assigns may collect, use and disclose Your personal information for substantially the same purposes as those set out in this Privacy Policy. In the event a proposed transaction is not completed, We will require, by contract, the other party or parties to whom Your personal information was disclosed not to use or disclose Your personal information in any manner whatsoever for any purpose, and to return or destroy such personal information.

6. THIRD PARTY SERVICE PROVIDERS

6.1 General. We use third party service providers to provide technology, host data and servers, and otherwise assist Us in providing the Services. These third party service providers may have access to personal information as an incidental result of the services provided by them to Us, but these parties are not permitted to access Your personal information for their own purposes or uses.

6.2 Foreign Service Providers. Except where prohibited by law, We may use service providers that are located outside of Canada. As a result, some of Your personal information may be processed, stored and/or disclosed in a jurisdiction other than Canada and it may potentially be accessible to law enforcement and national security authorities of that jurisdiction. In the event that foreign law enforcement and/or national securities authorities request Your personal information, it shall only be provided in strict accordance with the law and subject to all required legal permissions.

7. PERSONAL INFORMATION RETENTION AND DELETION

- 7.1 Retention.** We process and store messages, logs, contact data and other related information in order to provide the Services. We will maintain such data and information in accordance with Our record retention policies and as permitted or required by law.
- 7.2 Deletion.** We may reject, suspend, alter, remove or delete data that You provide to us or submit using the Services if We determine that such data breaches Our Terms and Conditions or that such actions are reasonable or necessary to protect Us or others. Within a reasonable time following termination of the Terms and Conditions, We will securely delete personal information from Our systems or convert this information into de-identifiable data. We will also securely delete personal information from Our systems upon Your request. When personal information is deleted or updated, it may take up to thirty (30) days or more from accessible systems, and up to ninety (90) days or more from backup systems, for Us to delete such personal information. You acknowledge and agree that if You request that Your personal information be deleted from Our records, it may not be possible to completely delete all personal information due to technological and legal constraints. In addition, Registered Providers may have retained copies of Registered Patients' personal health information in accordance with their own privacy policies which We do not have control over.

8. SAFEGUARDING YOUR PERSONAL INFORMATION

- 8.1 General.** We take reasonable steps to protect personal information that We collect to prevent loss, misuse, unauthorized access, disclosure, alteration and destruction. We have in place reasonable physical, electronic and operating procedures to safeguard and secure the personal information We collect. Although We make reasonable efforts to protect personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction, You should be aware that there is always some risk that an unauthorized party could find a way to breach Our security procedures and systems and/or those of Our service providers. This risk is heightened for information that is transmitted via unsecured or public Wi-Fi.
- 8.2 Storage of Personal Information.** We store personal health information in Canada, with Amazon Web Services (“AWS”). AWS hosts all BPI servers, databases and applications in the AWS cloud.
- 8.3 Your Role.** You also play an important role in protecting Your personal information. You should:
- (a) create a strong and unique CORIGAN password and update it periodically;
 - (b) not share Your account information with anyone;
 - (c) log out of Your account once You are finished using it, especially if You share Your device with another person;
 - (d) choose a quiet, private location from which to use the Services; and
 - (e) maintain Your software, devices and networks as required to ensure security.

9. INFORMATION WE COLLECT AUTOMATICALLY

9.1 Computer or Mobile Device. We automatically collect information about Your computer or mobile device when You use CORIGAN and the Services. This information may include Your IP address, browser and device type, access times, the web pages from which You came, the regions from which You navigate CORIGAN and the webpage(s) You access (as applicable).

9.2 Cookies. Our website may use “cookies” to enhance the user experience. Web cookies are very small text files that are stored on the user’s computer from a webpage to keep track of information about the user’s browsing on that site. The use of cookies allows Us to capture standard web traffic information, such as the time and date the user visited Our website, their IP address, and their browser information. In no circumstances do the cookies capture any information that can personally identify the user. The user may choose to set their web browser to refuse cookies, or to alert the user when cookies are being sent. If the user sets their web browser to disable cookies, some parts of the website may not be accessible to the user.

10. LINKS TO OTHER WEBSITES

10.1 Links to Other Websites. CORIGAN may contain links to other websites that We do not own or operate. These links are not intended as an endorsement or referral to the linked websites. We strongly encourage You to review the privacy policies applicable to any website You visit. This Privacy Policy does not apply to such linked websites, and We are not responsible for the content or practices of any linked websites or their operators, which are provided solely for Your convenience.

11. DATA INCIDENT

11.1 Data Incident. Although We take reasonable measures which are designed to prevent any loss, theft or unauthorized access, disclosure, use, modification or disposal of personal information (a “**Data Incident**”), there is no guarantee against such Data Incident. In the event of a Data Incident, We will, where required by law:

- (a) inform You without undue delay of the Data Incident;
- (b) provide You with information about the nature and scope of the Data Incident; and
- (c) take appropriate steps to contain and remediate the Data Incident.

12. GOVERNING LAW

12.1 Governing Law. This Privacy Policy shall be governed by and interpreted, construed and enforced in accordance with the laws of the Province of Ontario and the laws of Canada applicable therein. As required by applicable privacy laws, We will work with You to promote and demonstrate compliance with privacy laws and this Privacy Policy by providing reasonable and necessary information and documentation to allow You to verify Our compliance with this Privacy Policy, and providing required information and assistance to You and to any regulatory or other governmental bodies or authorities with jurisdiction or oversight over privacy laws in connection with any investigations, audits or inquiries.

13. CONTACTING US

- 13.1 Contacting Us.** You may contact Our Privacy Officer to make enquiries regarding Our privacy practices or with respect to the accuracy of Your personal information retained by Us and to request an update, correction or deletion of such information. You may access Your personal information by accessing Your CORIGAN account. Any query, comments or concerns can be sent to Us by email at info@getcorigan.ca or by mail to the following address:

Bluewater Promotions Inc., 481 London Road, Sarnia, Ontario Canada N7T 4X3,
Attention: Privacy Officer

14. CHANGES TO THIS PRIVACY POLICY

- 14.1 Changes to this Privacy Policy.** We may change and update this Privacy Policy. We will notify Our users of changes to this Privacy Policy by sending notices by email to the addresses provided by Our users. The current version of this Privacy Policy will be posted to Our website. By continuing to use Our Services following a change to this Privacy Policy, or otherwise providing personal information, the user agrees to be bound by the revised version of this Privacy Policy.