

Appendix 3

TELUS Health Solutions
Corporate Privacy Policy
Protecting Personal Information
of Customers

Table of contents

1) Purpose	42
2) Scope	42
3) Definition of personal information	42
4) Privacy principles	42
A) accountability	42
B) identifying purposes for collection of personal information	43
C) obtaining consent for collection, use or disclosure of personal information	43
D) limiting collection of personal information	44
E) limiting use, disclosure and retention of personal information	44
F) accuracy of personal information	44
G) security safeguards	45
H) openness concerning policies and practices	45
I) access to personal information	45
J) challenging compliance	46
5) Reminder (our responsibilities)	46

1. Purpose

TELUS Health is in the business of delivering solutions that enable our customers to interact and conduct business electronically (which may include the electronic transmission of Personal Information between different stakeholders for a very specific purpose). TELUS Health deems protection of Personal Information of its customers to be of paramount importance. Our commitment to safeguard individuals' right to privacy in compliance with applicable privacy legislations and contractual requirements is of significant importance to TELUS Health and is critical to justify our leading role of powering business interactions in North America.

TELUS Health's privacy practices were developed in accordance with the applicable privacy legislations (which are in accordance with the principles set out in the *National Standard of Canada entitled Model Code for the Protection of Personal Information*).

This TELUS Health Corporate Privacy Policy Protecting Personal Information (the "**TELUS Health Privacy Policy**") outlines the responsibilities of TELUS Health Solutions GP and its subsidiaries (collectively "**TELUS Health**") and TELUS Health's employees (which includes consultants and temporary hires whose duty require access to Personal Information) concerning the protection of Personal Information of TELUS Health's customers.

The rights and responsibilities of employees and TELUS Health concerning the protection of personal information of the TELUS Health s employees are governed by a separate policy, the TELUS Privacy Code.

2. Scope

The scope and application of the TELUS Health Privacy Policy are as follows:

- The TELUS Health Privacy Policy applies to Personal Information of TELUS Health's customers that is collected, used and/or disclosed by TELUS Health [it being understood that TELUS Health's employees sometimes delivers products and services to corporate customers (who in turn provide products and services to individuals) and sometimes directly to customers who are identifiable individuals].
- The TELUS Health Privacy Policy applies to the management of Personal Information in any form whether oral, electronic or written.
- The application of the TELUS Health Privacy Policy is subject to the requirements or provisions of any applicable legislation, regulations, agreements or the ruling of any court or other lawful authority.

3. Definition of personal information

For the purpose of this TELUS Health Privacy Policy, **Personal Information** means information about an identifiable individual (which includes personal health information such as diagnostic, health history, treatment and care information, payment or eligibility for health care information) but not aggregated information that cannot be associated with a specific individual.

4. Privacy principles

A) Accountability

TELUS Health is responsible for Personal Information under its control and shall designate one or more persons who are accountable for TELUS Health's compliance with the following principles.

TELUS Health has designated the Head of Privacy to oversee compliance with the TELUS Health Privacy Policy. The Head of Privacy can be contacted at:

Privacyhealth@telus.com or
Privacyhealthspace@telus.com

To that effect, TELUS Health has implemented policies and procedures to give effect to TELUS Health Privacy Policy, including:

- TELUS Health employees undergo privacy training to ensure continued compliance with applicable laws (including the TELUS Health Privacy Policy) and awareness;
- implementation of security standards through the TELUS Corporate Security Policies and the TELUS Health Data Centre Security Policy; which policies outlines security requirements for TELUS Health systems or network, including technical security requirement and procedures to protect Personal Information that may be accessible via such systems or network;

- c) TELUS Health’s contractual practices require inclusion of appropriate privacy provisions into customers and third party provider agreements when Personal Information is either collected, used and/or disclosed;
- d) TELUS Health employment agreement includes contractual provisions for the safeguard and proper usage of confidential information (which may include Personal Information) made available by our customers to our employees in the course of their employment;
- e) On a yearly basis, TELUS Health employees sign the TELUS Ethics Policy (which includes the TELUS Health Privacy Policy) which again reiterates the requirements for the safeguard and proper usage of Personal Information;
- f) Procedures to receive and respond to inquiries or complaints.

TELUS Health is responsible for Personal Information within its custody or control, including information that has been transferred to a third party for processing. TELUS Health shall use appropriate means to provide a comparable level of protection while information is being processed by a third party.

TELUS Health shall make known, upon request, the title of the person or persons designated to oversee TELUS Health’s compliance with the TELUS Health Privacy Policy.

TELUS Health has designated the Head of Privacy to oversee compliance with the TELUS Health Privacy Policy. The Head of Privacy can be contacted at: Privacyhealth@telus.com or Privacyhealthspace@telus.com

B) Identifying purposes for collection of personal information

TELUS Health shall identify the purposes for which Personal Information is collected at or before the time the information is collected.

TELUS Health collects Personal Information for the following purposes:

- a) For the provision of products and services to its customers (in compliance with contractual obligations);
- b) To manage and develop its business and operations, including personnel and employment matters; and
- c) To meet legal and regulatory requirements.

TELUS Health shall use reasonable efforts to ensure that a customer is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes shall be stated in a manner that can be reasonably understood by the customer (for example in the contractual agreement).

Unless required by law, TELUS Health shall not use or disclose, for any new purpose, Personal Information that has been collected without first identifying and documenting the new purpose and obtaining the consent from the customer (either corporate or individual, as the case may be).

Employees who are collecting Personal Information from corporate customers or individuals should ensure that such customers or individuals are advised of the purposes for which Personal Information will be used or disclosed.

C) Obtaining consent for collection, use or disclosure of personal information

The knowledge and consent of the individual are required for the collection, use or disclosure of Personal Information, except where inappropriate as determined by applicable legislation.

TELUS Health shall seek consent (either from TELUS Health’s corporate customer when Personal Information is collected by the corporate customer or from the individual directly when the Personal Information is collected by TELUS Health) to use and disclose Personal Information for the identified purposes at the same time it collects the information.

TELUS Health will require customers to consent to the collection, use or disclosure of Personal Information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill the identified purposes.

In determining the appropriate form of consent, TELUS Health shall take into account the sensitivity of the Personal Information and the reasonable expectations of its customers.

A customer may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice.

When employees are collecting Personal Information (either directly from an individual to whom the Personal Information belongs or from our corporate customers), the employees must communicate with the TELUS Health Law Department to ensure that proper consents have been obtained prior to the collection, use and/or disclosure.

D) Limiting collection of personal information

TELUS Health shall limit the collection of Personal Information to that which is necessary for the purposes identified by TELUS Health at the time of collection.

TELUS Health may collect Personal Information from its corporate customers (who are generally not the individuals to whom the Personal Information belongs, but represent to TELUS Health that they have obtained appropriate rights from such individuals to disclose the Personal Information to TELUS Health and third party providers, if any) or from the individual directly.

To that effect TELUS Health ensures to collect, either from the corporate customer or directly from the individual, only the Personal Information that is required to fulfill the purposes identified at the time of collection (generally the services performed as per the terms of the contractual agreement).

Employees who collect Personal Information (either directly from an individual to whom the Personal Information belongs or from our corporate customers) must ensure that they ONLY collect what is needed to fulfill the purposes (in case of doubt - please communicate with the TELUS Health Law Department to ensure that collection is conducted in compliance with laws and/or contractual rights and obligations).

E) Limiting use, disclosure and retention of personal information

TELUS Health shall not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the customer (either corporate or individual) or as required by law.

TELUS Health may only disclose customer's Personal Information as permitted pursuant to the terms and conditions of the contractual agreement with such customer (with the proper contractual agreement in place with such third party to whom Personal Information may be disclosed) or as required by law.

TELUS Health shall keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law.

Only those employees of TELUS Health who require access for business reasons, or whose duties reasonably so require, are granted access to Personal Information about customers.

F) Accuracy of personal information

Personal Information used by TELUS Health shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used for the provision of products and services (it being understood that whenever Personal Information is provided directly by the corporate customer to TELUS Health and not directly by the individual identifiable customer; TELUS Health must contractually rely on the corporate customer to ensure that such information is accurate, complete and up-to-date).

TELUS Health shall, when appropriate and feasible, update Personal Information about customers upon notification by the customer.

Personal Information in our custody shall be accurate, complete and up-to-date as is necessary for the purposes for which it was collected.

G) Security safeguards

TELUS Health shall, in compliance with the TELUS Corporate Security Policies and the TELUS Health Data Centre Security Policy (which policies, among other things, outline security requirements for TELUS Health networks and systems), protect Personal Information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, using security measures appropriate to the sensitivity of the information. TELUS Health shall protect the information regardless of the format in which it is held.

TELUS Health shall protect Personal Information disclosed to third parties by contractual agreements stipulating, among other things, the confidentiality of the information and the purposes for which it is to be used.

All employees of TELUS Health with access to Personal Information are required as a condition of employment to respect the confidentiality of Personal Information.

TELUS Health shall protect Personal Information by security safeguards appropriate to the sensitivity of the information.

H) Openness concerning policies and practices

TELUS Health shall make information about its policies and practices accessible and easy to understand. In addition, TELUS Health shall, upon request, provide the title and address of the person or persons accountable for TELUS Health's compliance with this policy and to whom inquiries or complaints can be forwarded.

TELUS Health shall make available information to help customers exercise choices, if any, regarding the use of their Personal Information.

TELUS Health shall make readily available to customers specific information about its policies and practices relating to the management of Personal Information.

I) Access to personal information

Upon written request, TELUS Health shall inform a customer of the existence, use and disclosure of his or her Personal Information and shall provide a reasonable opportunity for the customer to review the relevant Personal Information in the individual's file. Personal Information shall be provided in understandable form within a reasonable time and at minimal or no cost to the individual.

In certain situations, TELUS Health may not be able to provide access to the Personal Information that they hold about a customer. For example, TELUS Health may not provide access to information if doing so would likely reveal Personal Information about a third party, could reasonably be expected to threaten the life or security of another individual, is available by other more appropriate means, and/or would be prohibitively costly.

Also, TELUS Health may not provide access to information if disclosure would reveal confidential commercial information, if access could jeopardize the security of other information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If access to Personal Information cannot be provided, TELUS Health shall provide the reasons for denying access upon request.

TELUS Health shall promptly correct or complete any Personal Information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, TELUS Health shall transmit to third parties having access to the Personal Information in question any amended information or the existence of any unresolved differences.

A customer shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Upon written request, TELUS Health shall inform a customer of the existence, use and disclosure of his or her Personal Information.

J) Challenging compliance

TELUS Health shall maintain procedures for addressing and responding to all inquiries or complaints from its customers about TELUS Health's handling of Personal Information.

The Head of Privacy may seek external advice where appropriate before providing a final response to individual complaints.

TELUS Health shall investigate all complaints concerning compliance with this policy. If a complaint is found to be justified, TELUS Health shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A customer shall be informed of the outcome of the investigation regarding his/her complaint.

Employees should provide, upon request by a customer, the contact information of TELUS Health Head of Privacy to address any questions or complaints of customers concerning their Personal Information within TELUS Health's custody or control.

- Ensure that your access and usage of Personal Information is limited to information you need to know to perform our work and to provide services to our customers;
- Apply "clean desk policy";
- Ensure that all documents (electronic or paper) containing Personal Information are shredded or properly deleted when no longer needed;
- Use unique user ID and password for those who need to know (and tracking functionalities);
- Do not store Personal Information on shared drive;
- Do not send non-encrypted Personal Information over the internet;
- Do not use real (live) data of customer for demonstration and/or within development or staging environment (unless customer has consented to such usage);
- Never disclose Personal Information to a third party unless expressly agreed to by the customer to whom such information belongs (which includes depersonalization of all reports containing Personal Information that are to be sent to third parties);
- Never obstruct a complaint investigation or an audit made by a privacy commissioner.

5. Reminder (our responsibilities)

In addition to the foregoing, you will find below a **non-exhaustive** list of physical, technical and administrative practices to be employed (or not to be employed) by **all employees** to ensure proper usage and safeguard of Personal Information within TELUS Health's custody:

- Maintain the confidentiality of the Personal Information you are required to have access to in the context of your work;
- Protect electronic and paper documents containing Personal Information with proper security safeguards, including: locked cabinets, password protected screen savers, unique user ID;