

Privacy Policy

At HealthIM™ (“HealthIM”), your right to privacy is very important to us. We provide police services with a secure mental health reporting system to standardize communication between officers and health practitioners, and assist decision making in the field, by means of software that integrates with existing police hardware and incorporates the interRAI Brief Mental Health Screener (BMHS), a tool to help them to identify persons in the community with mental health problems and to assist them in communicating their observations to appropriate health care professionals.

In order to provide you with this service effectively, we collect certain specific information from you, and we also automatically collect information and data relating to the usage of our services by all our users, including you. Because we are committed to protecting your privacy rights and the information you provide to us, we have developed this privacy policy. It explains how we will protect your information and describes how we will use and share it.

This policy is concerned with the protection of personal information only. Personal information includes any data that can be used to identify you as an individual, including your name, income, personal opinion, interests, home contact information, identification numbers, user IDs, passwords, ethnic origin, and age. However, under Canadian law, in a business context, personal information does not include the name, job title, business address, or business telephone number of any employee in an organization.

This policy describes the following practices:

- Collecting information
- Sharing your personal information
- Maintaining your personal information

This privacy policy may change from time to time to reflect HealthIM’s internal needs, customer feedback, or changes in applicable privacy legislation. HealthIM will post all such changes on our website, so please visit this page regularly.

NOTE: HealthIM software and services are not intended for use by children under the age of 13. We do not knowingly collect or maintain any personal information or non-personally-identifiable information from anyone under the age of 13 nor is any part of our website, software or service directed to children under the age of 13. We will close any accounts used exclusively by such children and will remove and/or delete any personal information we believe was submitted by, or pertains to, any child under the age of 13. In your use of HealthIM software and services in conjunction with your own or third party databases, it is your responsibility to comply with the foregoing privacy policy requirement.

Collecting information

In order to use the services provided by HealthIM, you may be required to provide specific information about yourself, such as your name, address, telephone number and e-mail address, and about individuals whose information you wish to input into the services. We will always inform you when we need information that personally identifies you, and we will keep this information in strict confidence – however, **by using HealthIM’s services, you acknowledge that you will be providing HealthIM with information about individuals that they may consider to be their personal information. It is your responsibility to make sure that you have the right to disclose their personal information to HealthIM, and to let them know that their personal information will be handled in accordance with this privacy policy.** You may also, on occasion, voluntarily provide HealthIM with information that can be classified as personal information – all such personal information will be stored and maintained in accordance with this privacy policy.

We collect information about you in the following ways:

As part of your use of HealthIM’s software and services

You have the ability to transmit and post information through HealthIM’s services, such as comments, that may be viewed by others within your organization, or by third parties. Where such information and comments are input through the form available through the services, HealthIM will protect it in a secure system and share such

information only with the users or third parties that have legal access to such information, pursuant to your or your company's agreement with HealthIM. Any personal information that you voluntarily post to any public forum will NOT be considered confidential in any way, and HealthIM will not have any obligation to protect it in a secured system or obtain your consent to its disclosure, as you will have made the decision to publicly post it. However, at your request, HealthIM will be happy to change it, remove it, or restrict access to it (subject to technical feasibility) in order to protect the integrity of the personal information.

Automatically by HealthIM's software and services

HealthIM's software and services contain features that automatically collect information from users, such as usage statistics, and other tracking information, from which it may be possible to identify individual users. We therefore treat such information, to the extent that it can identify individual users, as personal information. Additionally, use of HealthIM's website and/or software may result in the collection of technical information such as your computer's IP address, operating system, browser name/version, the referring web page, requested page, date/time, and sometimes a "cookie" (which can be disabled using your browser preferences); such information is used to help us understand the overall usage pattern of our website and software.

You contact HealthIM directly

When you contact any HealthIM employee by telephone, e-mail, in person, or through our website, you will be asked to provide consent to the collection of personal information if we require your personal information to help us to deliver the information, products, or services you require. Notwithstanding the foregoing, by providing personal information to HealthIM in the course of making any unsolicited request of HealthIM, you acknowledge that your consent has been tacitly provided to HealthIM to use your personal information in relation to such request and in accordance with this privacy policy.

You respond to communications from HealthIM

From time to time, HealthIM may invite you to provide us with information for specific purposes. We may ask for this information through feedback features on our website or software; we may send out e-mail inviting feedback or offering products and services; or we may ask you for information concerning support of our products or services. Your response to these communications may require you to submit personal information and opinions.

Your information is obtained through a third party

Occasionally, HealthIM will obtain information about you from third parties, such as mailing list providers, third party service providers, ISPs, or third party application or account providers. Third-party providers are responsible for obtaining consent for the release of personal information to us from those individuals identified on mailing lists, surveys, or through other collection methods.

Sharing your personal information

Subject to any exceptions stated above in the collection of information section, should HealthIM collect any of your personal information, we will follow these practices regarding the distribution of that information.

Your personal information is always protected

HealthIM uses reasonable precautions to protect personal information and store it securely. Access to your personal information is restricted to those personnel who need it, and HealthIM takes reasonable steps to prevent the unauthorized use or disclosure of personal information.

HealthIM only uses and discloses your personal information if it helps us facilitate your needs, improve our products and services, meet legal and regulatory requirements, or — to the limited extent possible — manage our internal business operations. Additionally, if there are any disclosure or use restrictions in your consent to the collection of your personal information, HealthIM will abide by those restrictions (subject to the consent exceptions listed below).

HealthIM may combine your information with other information into an aggregate form, so your information no longer personally identifies you. We may then disclose the aggregate information to third parties, so they can obtain an overall picture of HealthIM' products, services, customer sectors and/or usage patterns.

We only share your information with your consent

HealthIM provides your information to third parties only for purposes to which you have consented, and unless you are responsible for maintaining the relationship with such third parties and requiring them to maintain information confidentiality, we require such third parties to keep your information confidential.

In a few situations, HealthIM may be required to disclose your information without your prior consent. For example, HealthIM may disclose your information if we are required to do so by law, or if we believe in good faith that such disclosure is necessary to:

- comply with law or legal process
- protect and defend our rights and property, or the rights and property of a third party
- protect against misuse or unauthorized use of any of HealthIM' products, software, services, or other proprietary materials
- protect the personal safety of any person
- allow for a change of ownership of HealthIM and associated transfer of all personal information to the new owner of HealthIM – this does not affect the protection of your information under this Privacy Policy

HealthIM will always try to provide you with prior notice of such disclosure; however, such notice may not always be possible or reasonable given the circumstances.

Additionally, with respect to any personal information belonging to other individuals whose information you have provided to us, HealthIM is obligated to comply with such persons' wishes with respect to the handling of their personal information. Accordingly, where such individual notifies HealthIM directly or through you to express their desire to have their personal information handled in a certain way, HealthIM will comply with the instructions of that individual, subject to the other applicable terms of this privacy policy.

Maintaining your personal information

HealthIM has established the following practices regarding the maintenance of your personal information.

You can request access to your personal information at any time

If, for any reason, you wish to review your personal information that HealthIM has in its possession, you can contact our Privacy Officer, who will be pleased to provide you with all your personal information that HealthIM has on file.

You can request changes to your personal information at any time

Sometimes, it will be necessary for you to update your personal information HealthIM has on file. For example, if your contact information changes, you must update your information in order to keep receiving the services provided by HealthIM.

If you wish to make any changes or corrections to your personal information, please contact our Privacy Officer who will implement the changes. This will help us ensure our records are always up-to-date.

You can opt out of communications at any time

Additionally, you always have the choice of whether you wish to receive information – such as e-mail updates – from HealthIM. In some cases, you may do so simply by changing the preferences in the software application through which HealthIM provides the services.

If you do choose to opt out of communications respecting products and services provided by HealthIM, you may not obtain all the benefits we could otherwise provide, such as updates or warnings. HealthIM will not have any liability to you for your loss of those benefits or any negative effects respecting your use of HealthIM's products or services.

You can request that your personal information be destroyed at any time

A situation may arise where you desire to have all of your personal information that is contained in HealthIM's records deleted or destroyed. If this is what you wish, please contact our Privacy Officer, who will take care of removing your personal information from all of HealthIM's records. However, there may be situations where we are obligated to retain one archival copy of your information to allow us to comply with laws or respond to legal

processes. We will inform you of all such situations, and will only use your retained personal information to the limited extent necessary to comply with such laws or respond to legal processes.

Contacting our Privacy Officer

HealthIM welcomes your comments about this privacy policy, and we would be happy to provide any additional information you require. Please contact our Privacy Officer at:

Daniel MacKenzie
CTO, HealthIM
danielm@healthim.com

This privacy policy supplements any agreements you already have with HealthIM, such as your Customer Agreement or website terms and conditions. Our privacy policy does not replace the terms of those agreements. By agreeing to those terms and using HealthIM's website, products, software and services, you are consenting to the collection and use of your personal information by HealthIM in accordance with this privacy policy. This policy was written in accordance with the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA).