



## Product Privacy Policy

Last modified: October 18, 2021.

### 1. Introduction

This policy describes:

- How we collect, use, disclose, and protect the personal health information ("**PHI**") of our customers (the "**Community Pharmacy**" or the "**Pharmacist**") and the patients ("**you**").
- Describes the type of information we may collect from you or that you may provide when you use PharmAssess products (our "**Products**" or "**the Apps**") or our Website or portions thereof that are operated by PharmAssess (collectively, the "**Services**"), and are entered into by you and PharmAssess. For more information about our website's data collection, please visit our **Website Privacy Policy and Website Terms of Use**.
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We value patient privacy and act to ensure that it is protected. This Privacy Policy was written to capture our current practices and to adhere to federal and provincial requirements for the protection of personal information. The appropriate collection, use and disclosure of patients' personal health information is fundamental to our day-to-day operations and to patient care.

Protecting the privacy and confidentiality of patient personal and health information is important to PharmAssess, the Community Pharmacy, and Pharmacists that are providing services to you.

We strive to provide Pharmacists with excellent service. We are committed to the protection of your privacy. PharmAssess requires that every Community Pharmacist that uses PharmAssess products abide by our commitment to privacy and best practices in the handling of personal information.

This policy describes how we collect, protect and disclose personal information of patients and the rights of patients with respect to their personal information.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your personal information.

### 2. Applicability of this Privacy Policy

Our Privacy Policy attests to our commitment to privacy and demonstrates the ways we ensure that patient privacy is protected. Our Privacy Policy applies to the personal health information of all Pharmacy patients that are collected or handled through our products.

### **3. What is Personal Health Information?**

According to the Personal Health Information Protection Act (“PHIPA”), Personal Health Information is defined as information about an individual relating to their physical or mental health, including symptom information, medical and past medication history.

For the vaccine administration product (the Appointment Module) and the Minor Ailment Module, personal information includes your PHI, such as your full legal name, contact information, and prescription/medical information that may be collected by your Community Pharmacy and its authorized agents. You acknowledge that this information is disclosed to PharmAssess and to Pharmacy Access Solutions Inc. (“PASI”), as required for the provision of automated solutions supporting your health care services (e.g. vaccine administration &/or minor ailment care services, etc.). This information will also be sent to your pharmacy of choice. The personal information disclosed to PharmAssess and/or PASI will be used to provide you with the Product’s appointment booking services, including forwarding vaccine administration to your healthcare professionals.

### **4. Commitment**

We take our commitment of securing patient privacy very seriously. Each Community Pharmacy and its authorized employees associated with the Practice is responsible for the personal information under his/her control.

PharmAssess employees are informed about the importance of privacy and receive information periodically to update them about our Privacy Policy and related issues.

### **5. Why We Collect Information**

The Pharmacist asks you for information to establish a relationship and serve your medical needs and this information is recorded and processed through our products. We obtain information about you directly from your input in our products, by the Pharmacist’s input, or data received from other health care practitioners that the Community Pharmacy may have authorized access to.

You are entitled to know how we use your information and this is described in this Privacy Policy. We limit the information we collect to what the Pharmacist needs for providing health care services, and we will use it only for that purpose. We will obtain your consent if we wish to use your information for any other purpose.

### **6. Consent**

You have the right to determine how your personal health information is used and disclosed. For most health care purposes, your consent is implied as a result of your consent to treatment, however, in all circumstances express consent must be written. The Pharmacist and or the Community Pharmacy will receive your written Consent and will document the request in the patient’s medical records. If the consent is sent to PharmAssess directly, PharmAssess Privacy Team will notify the appropriate Community Pharmacy and their supporting staff.

Patients who wish to withdraw consent to disclose PHI must contact the Community Pharmacy that holds their PHI. It is understood that the consent directive applies only to the PHI which the patient has already provided, and not to PHI which the patient might provide in the future. The

PHIPA permits certain collections, uses, and disclosures of the PHI, despite the consent directive. Healthcare providers may override the consent directive in certain circumstances, such as emergencies; and the consent directive may result in delays in receiving health care, reduced quality of care due to healthcare provider's lacking complete information about the patient, and healthcare provider's refusal to offer non-emergency care. If your request consenting to withdraw PHI is forwarded only to PharmAssess, the PharmAssess team will send your request to the corresponding Community Pharmacy.

For both the Appointment and Minor Ailment Modules, by booking an appointment for the receipt of an available vaccine &/or by conducting a minor ailment service, you acknowledge that you are consenting to the following:

- You are allowing the pharmacist/pharmacy professional to administer the available vaccine as an injection &/or conduct a minor ailment assessment.
- You confirm that you have reviewed information about Health Canada approved vaccines and otherwise sought answers to your questions. If questions remain, you will contact your health care professional of choice for additional information.
- You understand the risks, benefits, expected outcome and possible side effects of the desired vaccine.
- You agree to wait in the pharmacy for 15 minutes after receiving the vaccine.
- You agree to see a doctor if you develop any side effects or health problems after receiving the vaccine.
- You agree that the Community Pharmacy may share personal information regarding this vaccination, as required, with public health officials, other healthcare providers.
- You allow the Community Pharmacy to retrieve other medical-related information such as but not limited to: your primary care provider's name and contact details, your allergies, past prescriptions, medical conditions, provided this information is already stored at the pharmacy.
- You consent to being contacted from time to time by the Community Pharmacy, PharmAssess, PASI and/or their authorized agents and service providers for the purposes of booking second and subsequent vaccine administrations &/or follow-up appointments related to your minor ailment assessment, receipt of a Personal Injection Record, and other follow-up appointments that may be required to facilitate the service or product provided.

## **7. Limiting Collection**

We collect information from the Community Pharmacy and/or directly by you, by fair and lawful means and collect only that information which may be necessary for purposes related to the provision of your medical care.

## **8. Limiting Use, Disclosure and Retention**

The information we request from you is used for the purposes defined. We will seek your consent before using the information for purposes beyond the scope of this Privacy Policy.

We, under no circumstances sell or provide patient lists or other personal information to third parties.

There are some types of disclosure of your personal health information that may occur as part of the Pharmacist Practice fulfilling its routine obligations and/or practice management. This may include consultants and suppliers to their Practice.

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

We encourage you to carefully read and understand the Community Pharmacy's own privacy policy with regard to the limit, use, disclosure and retention of your PHI.

## **9. Accuracy**

We endeavor to ensure that all decisions involving your personal information are based upon accurate and timely information. While we will do our best to base our decisions on accurate information provided by the Pharmacist, we rely on you to disclose all material information and to inform us of any relevant changes.

## **10. Safeguards: Protecting Your Information**

We protect your information with appropriate safeguards and security measures. Access to personal information will be authorized only for Pharmacists and their authorized employees associated with the Pharmacy practice, and other agents who require access in the performance of their duties, and to those otherwise authorized by law.

Other organizations and agents must agree to abide by our Privacy Policy and may be asked to sign contracts to that effect. We will give them only the information necessary to perform the services for which they are engaged, and will require that they not store, use or disclose the information for purposes other than to carry out those services.

Our computer systems are password-secured and constructed in such a way that only authorized individuals can access secure systems and databases. We store all information you provide to us behind firewalls on a secure server. We store all information you provide to us behind firewalls on a secure server.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards, which any Website visitor can view.

## **11. Openness: Keeping You Informed**

We prepared this plain-language Privacy Policy to keep you informed. If you have any additional questions or concerns about privacy, we invite you to contact us by phone +1 (613)-809-1229 or email at [info@pharmassess.ca](mailto:info@pharmassess.ca) and we will address your concerns to the best of our ability.

If your questions are regarding the Vaccine administration product, you can also contact PASI's Privacy Officer at 1-800-401-1246 Ext. 265.

## **12. Access and Correction**

We will give you access to the information we retain about you within a reasonable time, upon presentation of a written request and satisfactory identification.

If you find errors of fact in your personal health information, please notify your Community Pharmacy as soon as possible for the appropriate corrections. We are not required to correct information relating to clinical observations or opinions made in good faith by the Pharmacist. You have a right to append a short statement of disagreement to your record if we refuse to make a requested change.

If we deny your request for access to your personal information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

## **13. Children Under The Age Of 13**

Our products are not intended for children under 13 years of age. No one under age 13 may provide any personal information through our products without the supervision and authorization of their parents or guardians. We do not knowingly collect personal information from children under 13 without parents or guardian's supervision. If you are under 13, do not use or provide any information on our products, make any purchases, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use, without a parent or guardian supervision and authorization. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [info@pharmassess.ca](mailto:info@pharmassess.ca).

## **14. Challenging Compliance**

We encourage you to contact us with any questions or concerns you might have about your privacy or our Privacy Policy. We will investigate and respond to your concerns about any aspect of our handling of your information.

In most cases, an issue is resolved simply by telling us about it and discussing it. You can reach us at:

Privacy Officer

PharmAssess Diagnostics Corp.

1504 - 281 Mutual Street

Toronto, Ontario M4Y 3C4

Phone: +1 (613) 809-1229

Email: [info@pharmassess.ca](mailto:info@pharmassess.ca)

If, after contacting us, you feel that your concerns have not been addressed to your satisfaction, you have the right to complain to the Information and Privacy Commissioner/Ontario. The Commissioner can be reached at:

2 Bloor Street East, Suite 1400

Toronto, Ontario M4W 1A8

1-800-387-0073

1-416-325-9195 (fax)

## **15. Changes To Our Privacy Policy**

We may update our privacy policy from time to time, and we will post changes on this page.