

PRIVACY POLICY

This Privacy Policy was updated on April 14, 2024.

INTRODUCTION

We use a number of safeguards to protect the privacy of Users of the CareChain® platform and the confidentiality of their Personal Information and Personal Health Information (collectively referred to together in this Privacy Policy as “**Information**”).

All CareChain Providers have a legal agreement with MultiCIM (“**CareChain Provider Terms of Use**”) to abide by MultiCIM’s policies and procedures regarding the collection, use, disclosure, retention, disposal, destruction and protection of Information.

This Privacy Policy (“**Policy**”) summarizes how MultiCIM collects, uses, discloses, retains, disposes of, destroys, and protects Information as well as Data (information that does not identify an individual) in the course of providing Health Care Services. We are committed to complying with this Policy and with applicable provincial and federal privacy legislation. Please note that CareChain Providers have to meet their own regulatory requirements with respect to Information related to Health Care Services and use CareChain to satisfy these requirements.

The capitalized words and phrases used in this Policy have the same meaning as in our Terms of Use (“**Terms**”). You can also find a list of definitions at the bottom of this Policy. If you have questions, contact our Privacy Officer as indicated below.

COLLECTING AND USING INFORMATION

MultiCIM collects and uses Information only as necessary to provide Health Care Services to individuals who are 14 years of age or older and who have accepted the Terms. We minimize our collection and use of Information to what is needed for these purposes.

As mentioned, CareChain Providers are responsible for their collection, use, disclosure, retention, destruction, and protection of Information. As a result, the following description is an overview only of the use generally made of Information by MultiCIM for the purpose of facilitating the delivery of Health Care Services. A CareChain Provider may or may not choose to collect or use Information as described below in connection with a particular interaction with a User.

We collect and use your Information to register you, create your User Account, authenticate you when you log in and personalize your experience while using CareChain. We confirm your eligibility to use CareChain for Health Care Services by asking you to confirm your place of residence and date of birth that you provide when registering.

You may choose to enter your Information in CareChain, such as your emergency contact, allergies, health card number, insurance policy number, and daily progress on your care plan. We use Information that you enter, or upload, or which is created as part of an interaction with a CareChain Provider to make it available to you when you access your User Account. We may also use Information for the evaluation and

improvement of security measures, loss prevention and anti-fraud purposes, and to comply with regulatory and legal requirements.

We require your provincial health card number only when your Health Care Services are covered by public health insurance plans or in the event that your CareChain Provider refers you to health care services covered by such plans.

We collect and disclose your Information to Third-party Payors to determine your eligibility for payments, process claims, underwrite insurance policies, and administer insurance and benefits plans, including activities related to investigating, auditing, and preventing fraud and abuse within plans.

We may use Information to help us create, develop, operate, deliver, support and improve CareChain, its content, and the advertising provided to you through it (MultiCIM's and third parties') unless you have decided not to receive such advertising.

When you visit, use and interact with CareChain, we may receive certain Information about your visit, use or interactions. For example, we monitor the number of people that visit CareChain, which page(s) or features they accessed, the domains our visitors come from and which browsers people use to access CareChain (e.g., Microsoft [Internet Explorer](#) or Edge, [Mozilla Firefox](#), [Google Chrome](#) and [Apple Safari](#)). Other examples of Information we may receive:

- **Log Data:** Information that your browser automatically sends whenever you visit CareChain. Log Data includes your Internet Protocol (IP) address, browser type and settings, the date and time of your request, and how you interacted with CareChain.
- **Cookies:** Please see the "Cookies and Similar Technologies" section below to learn more about how we use cookies.
- **Device Information:** Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Information:** We collect Information about how you use CareChain, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities.

CareChain Providers may collect Information about you when you provide it during Health Care Services, by viewing the Information that you have entered or uploaded to CareChain (e.g., through completion of an intake questionnaire for Health Care Service) and/or by creating or compiling Information in CareChain. Information that will be available to CareChain Providers includes: the details that you provide in your Health Care Services request or your family physician or another referring care provider provides in a referral for Health Care Services on your behalf; information you have entered or uploaded to your account profile; information created during earlier interactions through CareChain with other CareChain Providers; the name, email address, phone number, sex, gender, date of birth, home (and work, if applicable) addresses, and primary care provider information that you provided when you registered; and your emergency contact's name and contact information

CareChain Providers use Information to provide you with Health Care Services using CareChain and, as with any health care provider, must comply with the privacy legislation and medical record-keeping obligations to which they are subject to when providing Health Care Services. CareChain Providers may create Information about your interaction with them through CareChain. They may export or print copies

of your Information that they collect. They will be required to establish a local health care record and print a copy of the Patient Record maintained on CareChain.

CareChain Providers may, but are not required, to contact your emergency contact if they believe that you are dealing with a medical emergency during a Health Care Service. You are responsible for advising your emergency contact that you are providing their name and contact information to MultiCIM and CareChain Providers, and for obtaining any necessary consent from them for the provision and use of their information in connection with CareChain.

USERS ELIGIBLE FOR HEALTH CARE SERVICES

To request Health Care Services, you must select a specific Health Care Service using CareChain. A primary care provider (e.g., your family physician) or CareChain Provider may also select a specific Health Care Service or disclose applicable symptoms on your behalf by referral through CareChain.

We use this Information to provide you with Health Care Services that you request, for which you are referred, or to telephone, text or email you about such services. CareChain presents to CareChain Providers with the Information provided in your Health Care Services request or referral. Unless you have elected to withhold access to Information held in CareChain about you, the CareChain Provider will be able to view it too. We may also notify you about the status of your Health Care Service and other requests via telephone, email or text.

We also use Information that you enter to provide you with services that you request us to perform on your behalf, e.g., securely faxing a summary report of your Health Care Services to your family physician or another care provider of your choice, or facilitate a referral to other health care services, whether within or outside of CareChain.

We use your Information to telephone, text or email you to notify you about services that you request or are referred to. For example, we notify you about the status of your Health Care Service and other requests.

We may collect location data through the use of your IP address where applicable for Health Care Services you have requested or for which you are referred to, e.g., ensuring you are connected to a CareChain Provider that is registered and authorized to provide such services in the jurisdiction where you are located. We also use your IP address for security purposes, e.g., presenting you with information about your account activity in your account settings.

COMMUNICATING WITH YOU

Should you submit Information about a medical issue, which is deemed an emergency by a CareChain Provider prior to your scheduled Health Care Service, MultiCIM reserves the right to contact you at any time using any of the contact information you have provided. This contact is strictly for the purpose of informing you that a CareChain Provider has viewed the Information relating to your Health Care Service and has cancelled the Health Care Service based on their belief that your symptoms may represent a medical emergency.

Updates and marketing: From time to time, as a registered User of CareChain, we may send you service announcements, including updates to this Policy, the Terms and software and keep you posted on our latest products and any upcoming events that may be of interest to you or apply to you. Your consent to receiving marketing communications will be requested upon registration with CareChain. You may opt-out of (or opt-in to) receiving marketing communications by logging in to your User Account and updating your preferences. For clarity, service announcements including updates to our policies and the Terms and software are not considered marketing communications.

Customer Support: If you email, fax, write to us or complete a “[Contact us](#)” form, we will collect the name and contact information that you provide to us and will use it to respond to you.

We only permit our Personnel to access Information to the extent necessary to perform their designated functions. We require them to protect the Information and maintain its confidentiality by complying with our policies, procedures and applicable law.

DISCLOSING INFORMATION

MultiCIM will not disclose, share, sell or rent your Information with or to any third party (except to the extent we disclose to CareChain Providers, Third-party Payors, referring care providers, emergency contacts and in compliance with regulatory and legal requirements as set out in this Policy), except with your consent, or to the extent necessary, in our good faith judgment, to: comply with applicable laws or regulations, respond to a subpoena, order, or similar obligation to produce information; establish or exercise MultiCIM’s legal rights or defend against legal claims; or investigate, detect, suppress, prevent or take action regarding illegal or prohibited activities, suspected fraud, situations involving potential threats to the reputation or safety of any person.

We rely on third party service providers outside of your province to support features in CareChain, which may necessitate the processing of some of your Information to take place outside of your province. Specifically, we rely upon Microsoft Azure for the cloud hosting of CareChain in Canada (Canada – <https://azure.microsoft.com>) and Vonage (United States – <https://www.vonage.com>) to support CareChain’s 2-factor authentication and virtual appointments feature. We also rely upon BlueSnap (United States – <https://www.bluesnap.com>) for online credit transactions and TELUS Health for online processing of insurance claims (Canada – <https://www.telus.com/en/health>). MultiCIM has agreements in place with our service providers that ensures that they:

- have implemented and maintain adequate security measures to protect your Information.
- will use your Information only for the purpose of performing the service agreement.
- will not keep your Information after the expiry of our agreement with them.

These service providers will notify MultiCIM as soon as possible in the event of a confidentiality incident takes place on their end, and we have the right to conduct verifications of our service providers to determine their privacy compliance. MultiCIM and service providers are committed to complying with applicable legal requirements related to the disclosure and use of your Information.

We may disclose Information for the purposes of the due diligence required for or for the completion of a transaction such as a merger, acquisition or asset sale. We will comply with any applicable legal requirements, including notice requirements, that apply to such transactions.

RETAINING AND DISPOSING OF INFORMATION

Unless you otherwise direct us, we will retain your Information on CareChain on your behalf until such times as you or we terminate your User Account. On termination, you will have an opportunity to print or make copies of your Information. To ensure that CareChain Providers may exercise any authority they have to withhold Information they compile in connection with Health Care Services from patients under the law, you will be required to request any access you would like to your Information about your Health Care Services from CareChain Providers. On termination of your User Account, once you have been given the opportunity to print or make copies of your Information, we will delete the Information associated with your User Account, except Information that a CareChain Provider advises us he or she requires in connection with a Health Care Service the CareChain Provider provided or unless otherwise required by law. In such circumstances, MultiCIM will destroy the Information when the CareChain Provider has obtained a copy or terminates his/her account with MultiCIM.

ACCESSING AND CORRECTING INFORMATION

You can access your Information to check that it is accurate, complete, and up to date by logging in to your User Account at <https://www.carechain.app/login>.

You are responsible for ensuring the accuracy of Information you enter into CareChain. You may update and edit any of your Information, except Information a CareChain Provider has created during a Health Care Service, when you log in to your User Account.

Contact the CareChain Provider who provided the Health Care Services to access or request a correction to the Information that they hold in their medical records.

You can request that a copy of your Information in CareChain by logging in to your User Account. You may choose to receive a Portable Document Format file (.pdf) or a structured comma-separated file (.csv) of your Information. MultiCIM may require up to five (5) Business Days to process your request. You are solely responsible for any such exported Information. MultiCIM does not take responsibility for your distribution, sharing or disclosure of such exported Information.

YOUR CHOICES

CareChain offers you functionality and choices for protecting your privacy which include:

- You may enable two-factor authentication on your User Account to help ensure that only you can access your account. If you do, in addition to entering your password to log in to your account to access CareChain, we will send a code to your mobile number or email, which you will need to enter. This added security prevents anyone else from accessing your account unless they have access to your log in information and your mobile phone or email.
- When seeking Health Care Services, you may withhold Information, e.g., consultation information and medical records from CareChain Providers. Please be aware that CareChain Providers may be unable to provide you with Health Care Services as a result. They will advise you of the implications of your choice.

- You may choose:
 - whether to receive communications by email or SMS.
 - to be contacted by researchers to discuss your eligibility and interest in participating in clinical research studies. Your participation in any studies require researchers to obtain your signature on an informed consent document. Your Information will not be disclosed to researchers by MultiCIM without your express consent.
 - to stop CareChain Providers who are involved in your care from viewing your Information.

Please contact us directly at privacy@carechain.app for assistance with using the privacy functionality or with any questions about using CareChain. Additionally, you may contact us at any time to: stop receiving e-mails or other correspondence from us, seek assistance with viewing and correcting Information, and close your User Account. To protect privacy, we may request information to verify your identity when you contact us.

SAFEGUARDING INFORMATION

MultiCIM takes the security of your Information seriously. We store your Information in electronic format within Canada, using computer systems with restricted access and housed in facilities using physical security measures. More generally, we have in place appropriate physical, technological, and organizational safeguards to protect Information against loss, theft, and unauthorized access, use and disclosure. As mentioned, MultiCIM Personnel are obligated to protect Information by adhering to our policies, practices and applicable laws. For more information about privacy safeguards, refer to the [Plain Language Description of CareChain and Security Safeguards](#).

You also play an important role in protecting your privacy and the confidentiality of your Information. For example:

- Create a strong and unique password for your User Account using CareChain's password strength guidelines, and update it periodically.
- Do not share your User Account or password with anyone. We will never ask you for your password, including in any unsolicited communication such as letters, phone calls or email messages, so please contact us if you receive such a request.
- Log out of your User Account once you are finished using it, especially if you share your Device with anyone else.
- Have a strong and unique password on your Device, too.

COLLECTING, USING AND SHARING DATA

Under the CareChain Provider Terms of Use, CareChain Providers permit MultiCIM to collect de-identified Information and use the resulting de-identified data for purposes that include: quality control activities designed to ensure use of CareChain in compliance with the our CareChain Provider Terms of Use and the Terms; improving CareChain and more generally, the use of patient-initiated services (through an understanding of usage and utilization patterns by Users and CareChain Providers); conducting academic research and designing surveys (to be posted and completed at the discretion of Users). We will not use Data to re-identify individuals.

COOKIES AND SIMILAR TECHNOLOGIES

CareChain, email messages, and advertisements may use “cookies” and other technologies such as pixel tags and web beacons. Cookies (also called web cookies, Internet cookies, browser cookies, or HTTP cookies) are small pieces of data stored on User's computer by the web browser while using CareChain. We use these technologies to better understand User behaviour, analyze trends, administer, personalize and improve the experience of using CareChain. You have the ability to accept or decline our use of cookies. You can refuse cookies by turning them off or blocking them in your Internet browser. You will generally find a “help” section on the toolbar. If you decide to turn off or block cookies, CareChain might not function correctly. At times, we may use third parties such as ad exchanges and data companies to serve our advertisements on CareChain. These companies may also use cookies and other technologies to report certain information about your visits to CareChain and other websites (such as web pages you visit from and your response to ads on CareChain) in order to measure the effectiveness of our marketing campaigns and to deliver ads that are more relevant and tailored to you, both on and off CareChain. By using CareChain and not turning off cookies, you are consenting to their use for the purposes described in this Policy.

LINKS AND THIRD-PARTY WEBSITES AND APPLICATIONS

CareChain may contain links to other websites that we do not own or operate. These links are not intended as an endorsement of or referral to the linked websites. We strongly encourage you to review the privacy policies applicable to any site you visit. This Policy does not apply to such linked pages or other sites, and we are not responsible for the content or practices of any linked websites or their operators which are provided solely for your convenience.

POLICY CHANGES

We reserve the right to amend our Policy at any time. Check back often to ensure you are aware of our current practices for collecting, using, disclosing, retaining, destroying, and protecting Information.

POLICY LANGUAGE

It is the express wish of the User and MultiCIM that this Policy, including notices and other communications, be drawn up in the English language only. Il est la volonté expresse des parties que cette politique, y compris les avis et les autres communications, soit rédigée et signée en anglais seulement.

CONTACT US

If you have any questions, concerns or suggestions about our privacy practices, please contact our Privacy Officer. Please include your name and contact information if you'd like us to respond to you.

ATTN: Privacy Officer

privacy@carechain.app

DEFINITIONS

“CareChain” means the MultiCIM patient management platform, which is a web or mobile application, as may be modified from time to time, provided by MultiCIM that enables CareChain Providers to: (i) receive and fulfill requests for Health Care Services; (ii) manage Patient Records; (iii) initiate patient referrals to other health care providers in the CareChain Network; and (iv) exchange relevant Information with other CareChain Providers, including sharing access to Patient Records.

“CareChain Provider” means an independent, regulated health professional authorized by MultiCIM, and who have accepted the CareChain Provider Terms of Use, to use and access CareChain and related services.

“CareChain Network” means a network of independent, regulated health professionals who are authorized by MultiCIM to receive referrals for specific health care services and licensed to provide such health care services in the province or territory in which they practice, including CareChain Providers.

“Data” means Information collected or compiled through the CareChain which has been de-identified.

“De-identify”, in relation to Information, means to remove information that identifies the individual or for which it is reasonably foreseeable in the circumstances that it could be used, either alone or with other information, to identify the individual, whereas **“De-identified”** and **“De-identification”** have corresponding meanings.

“Device” means a mobile or desktop device owned or controlled by a User and used to access CareChain.

“Health Care Services” means specific clinical assessment and/or treatment service provided by CareChain Providers (and which are within their scope of practice and expertise) to a User to diagnose, treat, or maintain a User’s physical or mental condition, to prevent disease or injury, or to promote a User’s health, which may be available to Users in their province or territory, through CareChain.

“Patient Records” means records containing Information about Users created by CareChain Providers in connection with the Health Care Services, a copy of which is maintained temporarily on CareChain.

“Personal Information” means information about an identifiable individual, which is not Personal Health Information, that is subject to Privacy Law and that is collected, created, compiled, used, disclosed or otherwise transmitted and/or stored on or by means of CareChain.

“Personnel” in relation to MultiCIM, means its employees and agents including independent contractors and sub-contractors, for whom MultiCIM is responsible at law.

“Personal Health Information” means information about an individual’s health or health care that is subject to Privacy Law and that is collected, created, compiled, used, disclosed or otherwise transmitted and/or stored on or by means of CareChain.

“Privacy Law” means the applicable legislation governing the collection, use, disclosure, and/or protection of Information in the province or territory in which a User receives Health Care Services.

“Third-party Payor” means any governmental entity, insurance company, employer, or other authorized party that is responsible for making payments with respect to a User’s Health Care Services. This definition includes not only those directly making payments but also administrators and service providers who facilitate the administration of these insurance or benefits plans.

“User Account” means an account created in the CareChain platform for an individual in accordance with our terms of use, and who is thereby eligible to receive Health Care Services through CareChain.