

## Privacy Policy

This Privacy Policy explains how SCAN Health (“SCAN Health”, “us”, “we”) collects, uses, discloses, stores, safeguards and retains your Personal Information. By using and accessing this website, and participating in SCAN Health’s initiatives, programs and events, you accept the practices described under this Privacy Policy. If you do not agree to the terms of this Privacy Policy, you may not use our website or participate in our initiatives, programs and events.

SCAN Health understands that keeping your personal information confidential is very important to you and we have a strong commitment to meet your expectations. This Privacy Policy will help you understand how SCAN Health protects, collects, uses and discloses your personal information and your right to access that information.

### 1. Personal Information

“Personal Information” means information, other than business contact information, about an identifiable individual. We will keep Personal Information that you provide to us private and will disclose such Personal Information only in accordance with this Privacy Policy or with your consent. “Personal data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 2. Privacy Policy Application

This Privacy Policy applies to Personal Information that we collect when you use our website or when you participate in our initiatives, programs and events. This Privacy Policy does not apply to the practices of companies or other entities that SCAN Health does not own or control, or to people that SCAN Health does not employ or manage. Any Personal Information you supply, or authorize us, implicitly or explicitly, to supply to any third parties, is governed by the privacy policies of those third parties.

### 3. Data Controller

SCAN Health is the “data controller” of personal data collected by all of SCAN Health, and SCAN Health is responsible for deciding how personal data is collected, used, and disclosed.

#### **4. Third Party Information**

By using our website or participating in our initiatives, programs and events, you agree that, with respect to any Personal Information of any third party that you collect, use, disclose, store or retain, you have obtained any and all necessary consents in order to collect, use, disclose, store or retain such Personal Information. “Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; and, ‘restriction of processing’ means the marking of stored personal data with the aim of limiting their processing in the future.

#### **5. What Information is Collected**

We collect Personal Information that you provide when you register on, use or interact with our website or participate or register in our initiatives, programs or events. The Personal Information we collect includes your name, email address, website usage data, highest level of education, position of employment, Challenge related information, internet protocol (IP) addresses and other similar information that you provide to us, including information collected through the use of cookies on your browser.

#### **6. Cookies**

Our website may use cookies. By using our website and agreeing to this Privacy Policy, you consent to our use of cookies in accordance with the terms of this Privacy Policy. Cookies are files sent by web servers to web browsers and stored by the web browsers. The information is then sent back to the server each time the browser requests a page from the server. This enables a web server to track web browsers. There are two main kinds of cookies: session cookies and persistent cookies. Session cookies are deleted from your computer when you close your browser, whereas persistent cookies remain stored on your computer until deleted, or until they reach their expiry date.

Our website may use social media features, such as buttons or widgets, including share buttons or interactive mini-programs associated with Instagram, LinkedIn, Facebook and Twitter. These

features may collect your Personal Information or otherwise monitor your internet browsing activity and may use cookies to enable the functionality of the social media feature. These social media features may be hosted by a third party or hosted directly on our website. Your interactions with these social media features are governed by the privacy policy of the third party providing the social media features.

## **7. For What Purpose the Information is Collected**

We collect your Personal Information for the purposes of facilitating access to SCAN Health services, programs, initiatives and events, contacting you with respect to initiatives in which you participate, reporting on participation and engagement as required by relevant funding bodies (including applicable government agencies), tracking engagement of users of the website and for internal business purposes. We may also use your Personal Information, if applicable, to verify your identity, to respond to your queries, or to provide you with further information regarding our services, programs or initiatives.

As a user of our website, and a participant of our initiatives, programs and initiatives, you acknowledge and agree that SCAN Health, and its third party provider partners, may aggregate information about you and your use of our website, with similar information collected from users, in order to track progress of, and establish demographic data relating to, services, initiatives and usage of the website, and for service improvement and business purposes, provided that such aggregated information shall be anonymized (and will not be able to identify you).

## **8. Challenges**

SCAN Health may hold challenges and competitions (“Challenges”) that require online submissions through the SCAN Health, or a third-party provider’s website. Additional terms and conditions, including privacy policies, may apply to Challenges. Any information that SCAN Health receives from its third-party provider partners with respect to Challenges will be treated in accordance with this Privacy Policy.

## **9. Personnel Information**

We maintain information for purposes of personnel administration and information that is required from time to time by taxation authorities and providers of benefits under group benefit plans maintained by the organization and its employees.

- a) Personnel Administration

While gathering applications for employment, SCAN Health collects information from candidates, including contact details and relevant educational and work experience. We normally retain this information after a decision has been made unless an unsuccessful candidate asks us not to retain the information.

We collect information relating to the job history of employees up to the date of hire. During the course of employment, we collect and retain work evaluations, attendance data and records respecting compensation history. We also collect and maintain contact information respecting relatives and next-of-kin.

This information is used for employer-employee communications and in connection with our continuing evaluation of personnel requirements and performance assessment. It is kept in secure files to which only senior personnel have access. We do not sell or transfer this information to third parties for valuable consideration.

b) Tax Authorities

In connection with our obligations under taxation statutes, we collect employees' personal information, including current address, date of birth and social insurance number.

We use and disclose this information for the purposes specified by taxation legislation. It is kept in secure files to which only senior administrative personnel receive access.

c) Group Benefit Plans

In connection with the administration of medical benefit plans for staff, we collect personal information, including current address, date of birth, social insurance number and marital status.

We also collect certain personal details relating to the dependants of partners and employees.

**10. Use and Disclosure of Personal Information**

Personal Information that we collect from you will be used and disclosed for the purposes set out in this Agreement and for purposes we may identify to you at the time of collection. We may disclose your Personal Information to third party providers engaged to facilitate the programs, initiatives and events of SCAN Health or if required by law. However, we will not sell your Personal Information to third parties unless we ask for your prior permission, or unless it is otherwise permissible in accordance with this Privacy Policy.

We may disclose personal information: (a) to any governmental authority as part of an investigation to determine our compliance with any applicable law, rule or regulation (including privacy laws, rules and regulations) or for the purposes set out in this Privacy Policy; (b) in response to a court order, subpoena, discovery request or other lawful judicial or administrative proceeding; (c) as otherwise required by any applicable law, rule or regulation; and (d) in good faith, to protect or defend the rights or property of SCAN Health and other users.

#### **11. Security and Protection of Personal Information**

To protect your Personal Information, we take reasonable precautions appropriate to the sensitivity of the information and follow standard industry practices to safeguard your Personal Information. We also protect your Personal Information through the use of password controls that we ask you to keep confidential.

#### **12. Children's Privacy**

SCAN Health does not knowingly collect any personal information from children under the age of 13 and children under 13 are not permitted to register for an account. If you believe that a child has provided us with personal information, please contact us at [info.scanhealth@uwindsor.ca](mailto:info.scanhealth@uwindsor.ca). If we become aware that a child under age 13 has provided us with personally identifiable information, we shall immediately take the necessary steps to ensure that such information is deleted from our system's database.

#### **13. Access to and Accuracy of Your Information**

It is your responsibility to inform us of any inaccurate Personal Information. You may also request access to other Personal Information about you that may be in our custody. If you request to deactivate your account or delete your Personal Information, we will fulfil your request in accordance with this Privacy Policy and applicable privacy laws.

#### **14. Data Retention**

We will keep and retain your Personal Information for as long as your account is active with us or as long as necessary for the purposes for which it was collected (i.e. on our website as archives of previous Challenges). We will also retain data in compliance with our legal obligations.

#### **15. Withdrawal of Consent**

You may withdraw your consent to the collection, use and disclosure of personal information

about you at any time. To do this, please contact by email at [info.scanhealth@uwindsor.ca](mailto:info.scanhealth@uwindsor.ca). Withdrawal of your consent to the collection, use and disclosure of your Personal Information may result in you not being eligible to: (a) participate in our programs, initiatives or events: and /or (b) continue to use our website.

## **16. Privacy Policy Changes and Updates**

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide notice if these changes are material and, where required by applicable law, we will obtain your consent. Notice may be by email to you at the last email address you provided us with, by posting notice of such changes on our sites and applications, or by other means, consistent with applicable law.

## **17. Questions**

If you have questions about this Privacy Policy or require additional information on our practices, please feel free to contact our Privacy Officer at [Info.scanhealth@uwindsor.ca](mailto:Info.scanhealth@uwindsor.ca).

View the General Data Protection Regulation (GDPR) rules [here](#).

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