

## PRIVACY POLICY

**Last updated: 07-03-2024**

### Privacy declaration

At Aura Dermatologie inc., we hold the utmost respect for your privacy. As part of our commitment to safeguarding your personal information, we have established this privacy policy (the "Policy").

This Policy governs the collection, usage, processing, and disclosure of Personal Information, as defined by the *Loi sur la protection des renseignements personnels dans le secteur privé* or equivalent legislation in other jurisdictions. Personal Information encompasses data that pertains to an individual and allows for their identification.

### Purpose and terms of use

This Privacy Policy is intended to inform you about our practices regarding the collection, use, disclosure, and retention of personal information.

By providing us with personal information (through our website, our appointment and payment portal (Jane), by email, in person or by telephone), by accessing our website, and by utilising our services, you agree that such information will be processed in accordance with this Privacy Policy, and you authorize Aura Dermatologie inc., its partners and service providers to process your personal information for the purposes set out below.

You retain the option to amend or retract your consent for the utilization and disclosure of your Personal Information, or opt-out of specific uses and disclosures, subject to legal and contractual obligations. To affect such amendments or withdrawals, please contact our Chief Privacy Officer. Please be advised that the withdrawal of your consent may impede our ability to provide or uphold our Services to you.

This Privacy Policy does not apply to third party websites accessible through links on our website, and Aura Dermatologie inc. is not responsible for such third party websites. If you follow a link to a third-party website, that third-party website will have its own privacy policies which you should review before submitting any personal information.

### Updates to our Privacy Policy

We reserve the right to update this Privacy Policy periodically to reflect changes in our privacy practices, which will be effective immediately upon posting on the Website. We encourage you to regularly review this Policy to stay informed of any updates. If you do not agree with the amended terms, it is your responsibility to discontinue the use of our Services or Website. Your continued use of our Services or Website after the posting of changes constitutes your acceptance of the updated terms. We will indicate the date of the last update at the top of this Privacy Policy.

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## 1. Collection and Use of Personal Information

### What Personal Information is collected?

During the course of our activities, we may gather the following types of Personal Information about you or others, including:

- Contact Information: This encompasses details such as your name, date of birth, residential address, email address, telephone number, health insurance number, professionals, or institutions in your circle of care (family doctor or other treating professional, pharmacy, etc.), and emergency contact information.
- Medical Record Information: Information pertinent to your medical history and any relevant health conditions.
- Appointment and Service Details: Information regarding appointments scheduled and services provided by Aura Dermatologie inc..
- Transaction and Payment Information: Details concerning transactions and payments made for services rendered.
- Voluntarily Provided Information: Any additional information you choose to share with us voluntarily, such as through forms, surveys, or communication with our representatives.
- Automatically Collected Information: Information collected automatically when you interact with our website, including IP address, location data, pages visited, search engine queries, browser type, operating system, and other technical details through the use of cookies.

### Why is Personal Information collected?

- To plan and deliver our services;
- To prepare the necessary documents for your process (virtual visit, telephone visit, in-person visit, or any other process);
- To provide you the medical service you require and enable the professionals serving you to document the care received in the electronic medical record as required by their professional orders;
- To provide you with information tailored to your situation, answer your questions and provide you with assistance when necessary (in connection to our Services, Website or otherwise);
- To understand your needs and to perform, develop or improve our services (including to perform research and analysis relating the same);
- For marketing and business development purposes;
- To reorganize or change the structure of our business;
- To collect notices, comments, questions, requests and complaints regarding our Services and Website;
- To detect and prevent fraud, error, spam, abuse, security incidents and other harmful activities;
- To operate, administer, maintain, monitor, develop, improve and provide all the features of our website; and
- For other purposes permitted or required by law and any other purpose to which you have consented.

### When and How Do We Collect Personal Information?

- When you browse our website;
- When you schedule an appointment in person, over the phone or online through our online booking page using the Jane App, Clic Santé, Cliniqueprivee.ca, or any of our service partners;
- When you create an account with our practice using the Jane App;
- When you fill out a form;
- When you respond to questionnaires;

- When you submit a teledermatology consultation through SkinApp (DermEngine);
- We collect Personal Information directly from you during the provision of our services or when you engage with our website;
- Additionally, we may obtain information from third parties or publicly available records to enhance the quality and accuracy of the information we possess;
- We utilize cookies, which are small text files sent to your device, to enhance your browsing experience and tailor our services to your preferences. You have the option to accept or decline cookies through your browser settings. Please note that declining cookies may limit certain functionalities of our website.
- We employ web analytics services, such as Google Analytics, to analyze website usage patterns anonymously. This helps us refine our services and improve user experience. You have the option to opt out of such analytics activity through your browser settings.

The information collected through these means is used solely for the purpose of providing and improving our services and is handled in compliance with applicable privacy laws and regulations.

## 2. Sharing of Personal Information

Aura Dermatologie inc. will never sell or exchange your Personal Information for payment.

We may also disclose your Personal Information in special circumstances where it is permitted, necessary, or appropriate, including:

- To other healthcare providers: We may share your personal information with other health care providers and facilities (e.g., another physician or health care practitioner, an allied health professional or member of your clinical care team, a public hospital, pharmacy, laboratory, or ambulance service) for the purpose of providing continuity of your care. We may also share your personal information if necessary to contact your family or a potential substitute decision maker.
- To refer you to another clinic: In this case we may disclose certain information about you, such as your full name, gender, address, telephone number, and email address, another clinic to which you are referred to in order for you to access and use health care services offered by clinics in or outside of Québec.
- To various Service Providers: We may disclose your Personal Information to our contractors, consultants, agents, service providers, and other trusted third parties (collectively “Service Providers”) who require such information to assist us in operating our website or serving you. Such Service Providers are involved in various capacities, including our Website, servers, booking solutions, electronic medical records, laboratory testing, virtual care technology, printing, mail delivery, cloud storage services, billing and payment systems. Our service providers only receive the information they need to perform their assigned functions. They are not permitted to use or disclose personal information for commercial or other purposes. For more information regarding our Service Providers, we invite you to contact our Privacy Officer;
- To protect our business;
- To comply with an applicable statute, regulation, rule of law, a subpoena, a search warrant, a court or regulatory order, lawful requests by public authorities, including to meet national security or law enforcement requirements, or other legal process;
- To allow us to enforce available recourses or limit the damages we may suffer;
- To protect the safety and/or security of our users, the Website, our services, or the general public (including you); and
- In the event of a commercial transaction, namely the sale, transfer (including transfers made in connection with insolvency or bankruptcy proceedings), or assignment, in whole or in part, of Aura Dermatologie inc. or its assets.

### 3. Personal Information of other individuals and of children under the age of 14

In the event you provide Personal Information pertaining to another individual (inclusive of adverse parties and other individuals entangled in legal proceedings) to Aura Dermatologie inc., you affirm that, prior to submission, you have acquired the requisite consent or authority enabling us to collect, utilize, and disclose such Personal Information for the purposes outlined in this Policy, or such collection, utilization, and disclosure is sanctioned by applicable laws.

Considering the nature of our Services, we may acquire or utilize Personal Information from you regarding children under the age of 14. Hereby, we obtain the consent of the parent or legal guardian of these children in accordance with relevant laws.

### 4. Website

- IP address: We do collect the IP (Internet Protocol) addresses of all visitors to our websites, along with related information such as the pages visited, browser type, operating system, and average time spent on our websites. This information helps us understand website activity, monitor performance, and make improvements.
- Cookies: Our websites utilize cookies, which are small data elements sent to a user's browser and stored on their hard drive. This allows us to recognize the user's device upon return to the site. While users can configure their browsers to notify them of incoming cookies or refuse certain cookies, declining cookies may limit access to certain website features.
- Analytics: We employ web analytics services like Google Analytics to gather and analyze data on website usage, including popular pages, visitor engagement, and search terms. This information aids in evaluating and enhancing user experience and website functionality. For further details on Google Analytics or to opt-out of data collection (including IP address), a browser plug-in can be downloaded from the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. Additional information on Google Analytics data privacy and security can be found at the following links: <https://policies.google.com/technologies/partner-sites> and <https://support.google.com/analytics/topic/2919631>.
- Third-Party Links: Our websites may contain links to third-party sites not operated by Aura Dermatologie inc. These links are provided for user convenience and do not imply endorsement or referral to the linked websites. Please note that this Privacy Policy does not govern information collected by linked websites, which may have separate privacy policies, notices, and terms of use. We advise users to review the privacy policy of each website visited.
- Tracking Tags and Web Beacons: Websites may employ tracking tags or web beacons to discern page visits. These technologies assist in optimizing and tailoring website content for both current and future visitors.

### 5. Safeguards and Retention

Aura Dermatologie inc. implements a range of reasonable physical, administrative, technological, and organizational security measures to adequately safeguard the confidentiality and security of your Personal Information against loss, theft, or unauthorized access, disclosure, reproduction, communication, use, modification, or destruction. Aura Dermatologie inc. regularly reviews its security measures and procedures and adjusts them as necessary.

Personal Information collected is retained for varying periods depending on the type of information and the purposes for which it is collected and used. We delete or anonymize Personal Information when it is no longer necessary for the purposes for which it was collected, or for subsequent purposes related to and compatible with the original purposes of collection. We may retain archival copies of Personal Data for legal or security requirements, or as part of our customary practices for backup storage of information in the ordinary course of business.

Additionally, Aura Dermatologie inc. remains responsible for maintaining, in accordance with all applicable laws, all elements required in the electronic medical record of its patients, notwithstanding this Policy.

## 6. Your rights

You have the following rights and choices regarding your Personal Information:

- Disable cookies that are not necessary for navigating our website.
- Request an exported or physical copy of documents containing your Personal Information, subject to exceptions provided by applicable laws.
- Request to have your Personal Information rectified, amended, and updated if it is incomplete, ambiguous, out of date, or inaccurate.
- Request the deletion of your Personal Information if its collection is not permitted by law.
- Withdraw or change your consent to our processing of your Personal Information, subject to applicable legal and contractual restrictions. Note that withdrawing consent may result in Aura Dermatologie inc. being unable to provide you with some or all of its Services.
- If you receive our marketing emails, you can unsubscribe at any time by clicking the “unsubscribe” link at the bottom of the email or adjusting your preferences in your account profile on the website. You can also opt-out of marketing communications by contacting us using the information provided in the “Contact Us” section below.
- Close your account on our portal at any time. To do so or to request the deletion of personal information in your account profile, please contact us using the provided contact information. If you choose to close your account or delete personal information from your account profile, we may retain certain information, including medical records, to meet our legal or regulatory obligations. For more details, refer to the “Safeguards and Retention” section above.

## 7. Access to Information

You can submit a request for access to know the personal information that Aura Dermatologie inc. holds about you. You can also obtain the correction of this information if it is inaccurate, incomplete, or ambiguous, or if its collection, communication, and retention are not authorized by law. Subject to limited exceptions under applicable law, you have the right to access, review, update, and request correction of inaccuracies in your personal information and personal health information in our custody and control (and, in some provinces, to authorize another person to receive a copy of your personal health information). You may make these requests by sending us an email or writing to us at the contact information listed below. Additionally, you can update your personal information in your account profile or by contacting Aura Dermatologie inc. We may ask you for certain personal information when you make such a request to verify your identity.

## 8. Contact Us

For any inquiry regarding this policy, please contact:

Martin Costa  
Chief Privacy Officer and Chief Information Security Officer  
Telephone: (514) 252-3102  
Email: [martin@aura.ca](mailto:martin@aura.ca)