

COMMITMENT TO PRIVACY

WATSON CENTRE SOCIETY FOR BRAIN HEALTH ("Watson Centre", "we", "our" or "us") is committed to maintaining the security and privacy of your personal information. This Policy documents our on-going commitment to you and has been developed in compliance with the British Columbia *Personal Information Protection Act* ("PIPA").

1. SCOPE OF POLICY

This Policy addresses personal information about individuals and does not apply to information about corporate or commercial entities who deal with us. Commercial information may be subject to protection under other policies and practices and through contractual arrangements, including confidentiality agreements. This Policy does *not* impose any limits on the collection, use or disclosure of the following information by the Watson Centre:

- your business contact information; or
- publicly available information recognized under *PIPA*.

2. ACCOUNTABILITY

The Watson Centre is accountable and responsible for personal information under its control. We have designated a Privacy Officer who is accountable for the Watson Centre's compliance with this Policy.

3. WHAT WE MAY COLLECT

From time to time, the Watson Centre may collect personal information when you share such personal information with us by applying for, registering in, or participating in one of our programs, signing up or registering for an account on one or more of our websites, or otherwise submitting information to us. The Watson Centre may also collect information automatically through cookies and other tracking technologies, and from other sources such as third party services (e.g. Facebook, YouTube, Twitter, and LinkedIn). We will limit our collection of personal information to what is reasonably necessary to provide a service and which is reasonably necessary for the purposes consented to by you. We may also collect personal information as authorized by law.

4. PURPOSE

The Watson Centre collects your personal information for the following purposes:

- primarily to provide brain health programs and services to you. Our staff may use personal information for the provision of programs and care to you and for administrative and other support functions related to such programs and care including:
 - a. program planning, evaluation and monitoring, including quality improvement;
 - b. system administration;
 - c. privacy and security audits;
 - d. education and training related to the Watson Centre programs; and
 - e. as otherwise authorized by PIPA or applicable laws.

- to use and disclose the personal information for any purpose related to the provision of requested brain health programs and services, including billing you for the provision of such programs and services;
- to determine your potential needs and financial capabilities;
- to determine which programs and services may meet your potential needs;
- to authenticate your identity;
- to provide personal information to Watson Centre, and anyone else working for or dealing with us) in order to obtain other services and programs requested by you;
- to collect debts owed to us;
- to manage or transfer assets or liabilities of the Watson Centre, for example in the case of an acquisition or merger, the provision of security for a credit facility or the change of a carrier;
- for research in compliance with our policies and procedures related to research, including approval where applicable from any Research Ethics Board;
- to comply with legal and regulatory requirements; and
- with respect to employees, to fulfill the purposes set out in the Watson Centre employment agreements

The purposes listed above are a reasonably necessary part of your relationship with the Watson Centre.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is authorized or required by PIPA or other law.

5. CONSENT AND DISCLOSURE

The Watson Centre will obtain your consent to collect, use or disclose personal information except where we are authorized or required by PIPA or other law to do so without consent.

Your consent may be express or implied, or given through your authorized representative.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify us that you do not wish your personal information collected/used/disclosed for optional purposes following reasonable notice to you) or otherwise. For example, oral consent could be expressed over the telephone at the time information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application form.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided reasonable written notice of withdrawal of consent is given by you to the Watson Centre. Upon receipt of your written notice, we will inform you of the likely consequences of the withdrawal, which may include the inability of the Watson Centre to provide (or to continue providing) certain programs or services for which the delivery and use of that information is required.

You hereby consent to the Watson Centre disclosing your personal information to a third party provider under contract with the Watson Centre for the purposes of storage and provision of payment processing services. In such circumstances the third party shall hold and use your personal information in compliance with privacy

laws and shall not disclose your personal information without the consent of the Watson Centre pursuant to this Policy.

You hereby also consent to the Watson Centre disclosing your personal information to third parties in the following circumstances:

- on a “need-to-know” basis to other education program and/or health care providers or members of our team, both within and outside the Watson Centre, including to family members who may be providing care to you;
- to provide warnings or to avert risks where compelling circumstances exist that affect your health or safety, or the health or safety of another person, or in circumstances where there is a risk of significant harm to the environment or to the health or safety of the public (including the potential risk of domestic violence);
- to law enforcement (e.g., mandatory demands such as court orders or search warrants, requests by law enforcement).

6. LIMITS ON COLLECTION OF PERSONAL INFORMATION

The Watson Centre will not collect personal information indiscriminately and will limit its collection of your personal information to what is reasonably necessary to provide our programs and services and which is reasonably necessary for the purposes consented to by you. We may also collect information as authorized by PIPA or other applicable laws.

7. RETENTION OF PERSONAL INFORMATION

Your personal information will only be used or disclosed for the purposes set out above and as authorized by PIPA and other law.

The Watson Centre will keep personal information used to make a decision affecting an individual for at least one year after using it to make the decision.

We will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

We will take due care when destroying personal information so as to prevent unauthorized access to such information.

8. ACCURACY

The Watson Centre will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete. We will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

If you notify us of the inaccuracy or incompleteness of personal information, we will amend the information as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, we will annotate the personal information under our control with a note that a correction was requested but not made.

9. SAFEGUARDING PERSONAL INFORMATION

The Watson Centre protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

We will dispose of your personal information in an appropriate and secure manner when it is no longer required.

You should be aware that confidentiality and security are not assured when information is transmitted through e-mail or wireless communication. We will not be responsible for any loss or damage suffered as a result of a breach of security or confidentiality when information is transmitted by e-mail or wireless communication.

10. PROVIDING ACCESS

You have a right to access your personal information held by the Watson Centre.

Upon written request and authentication of identity, we will provide you with personal information under our control, information about the ways in which that information is being used and a description of the individuals and organizations to whom such information has been disclosed.

We may charge a reasonable fee for providing personal information in response to an access request and will provide an estimate of any such fee upon receiving a written access to personal information request. We may also require a payment of a deposit for all or part of the fee.

We will make personal information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, we may not be able to provide access to certain personal information. We may also be prevented by law from providing access to certain personal information.

Where an access request is refused in whole or in part, we will notify you in writing, giving the reason for refusal and outlining further steps which are available to you.

11. CHANGES TO POLICY

To keep pace with legal, economic and technological changes, the Watson Centre may revise this Policy from time to time. The revised Policy will be posted on our website, and will come into effect 30 days after it is posted.

12. COMPLAINTS

Any inquiry, complaint or question regarding this Privacy Policy must be directed in writing to the Watson Centre Privacy Officer.

Contact Information:

Mark Watson, MA Privacy Officer
WATSON CENTRE SOCIETY FOR BRAIN HEALTH
 Fortius Sport & Health
 3713 Kensington Avenue
 Burnaby, BC V5B 0A7

13. DEFINITIONS

In this Policy:

- "*collection*" means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means;

- "*consent*" means voluntary agreement to the collection, use and disclosure of personal information for specified purposes;
- "*disclosure*" means making personal information available to a third party;
- "*personal information*" means information about an identifiable individual but does not include his or her business contact information. Personal information does not include (a) information concerning corporate or commercial entities or (b) publicly available information. It also does not include information that cannot be associated with a specific individual;
- "*Privacy Officer*" means an individual designated by the Watson Centre who is accountable for compliance with this Policy and whose contact particulars are set forth in this Policy;
- "*third party*" means an individual or organization other than the Watson Centre and you;
- "*use*" means the treatment and handling of personal information by and within the Watson Centre.

[Version #1.0]