

Welcome and thanks for using Cambian Navigator! When you use our services, we promise to protect your privacy as outlined in this privacy statement.

## 1 Introduction

*Cambian Navigator is a personal health record (PHR) system that enables you to control how your personal health information is accessed, used, and shared.*

*Here are some definitions to help you better understand the terms that we use within this privacy statement.*

### 1.1 Background

Cambian Navigator is a personal health record (PHR) system that helps users enter, collect, store, analyze and share their personal health information. The system allows users to manage many different types of personal health information including information entered by you, generated by devices you use, or shared with you by healthcare providers or researchers. Various features within the application enable you to control how your personal health information is accessed, used, and shared.

### 1.2 Definitions

*Anonymized Data* means data derived from personal information that you or other users and providers have uploaded to our software but that contain no personal identifiers.

*Cambian Navigator* means Cambian software used to enter, collect, store and analyze personal health information online as well as enable collaboration between you and your healthcare providers.

*Personal Information* means information about an identifiable individual, including you, that is collected, used and disclosed in the course of using our software and includes personal health information.

*Provider* means a provider of healthcare services to you.

*Services* means the healthcare related services provided by Cambian Navigator to you.

*Software* means the on-line software used to provide the Cambian Navigator solution, delivered by Cambian to you, as made available by Cambian.

## 2 Commitment

*Cambian is committed to protecting and respecting your privacy.*

*Cambian does not disclose your personal information unless required by law.*

*Cambian may aggregate and anonymize your personal information for presentation to others.*

## 3 Personal Information

*Cambian collects certain personal information to help us set up your user account and enable us to provide services to you.*

### 2.1 Protecting Privacy

Cambian is committed to protecting and respecting your privacy. The Cambian Navigator solution incorporates Internet reliant, application-based technology that allows you to enter, collect, store, analyze, and share your personal health information online.

### 2.2 Disclosure of Personal Information

Cambian does not disclose your personal information unless required by law. Cambian does, however, use your personal information that is necessary to give you access to our software and, if required, address problems you may encounter with our software. Cambian also reserves the right to aggregate and anonymize personal information stored on its system. Otherwise, all use and disclosure of your personal information is in accordance with your instructions.

### 3.1 Collection

When you sign up to use Cambian Navigator and when you use the software, Cambian collects certain personal information in order to set up your user account, provide you with access to the system and administer your account. This personal information may include:

- your identification and contact information (name, address, date of birth, email address, etc.),
- optional information such as billing information (public or private insurer information) and your family doctor's name, and
- Web, computer, and other diagnostic information including your IP address, or computer/software/browser type.

As you use the application, you may collect and store other personal information, including:

- your health information including information entered by you, generated by devices you use, or shared with you by healthcare providers or researchers, and
- your healthcare information including your list of care providers and associated interactions.

*Cambian only collects personal information that is needed to provide our services and then only with your express consent, unless compelled otherwise by law.*

*Cambian uses your personal information in order to enable you to use our software.*

*You are providing Cambian with consent to use your personal information when you consent to our Cambian User Agreement and use our software.*

*Any aggregated and anonymized data created by Cambian is stored separately from personal information and does not identify individuals.*

*You can request copies of your personal information records and correct any inaccuracies by contacting Cambian.*

## **3.2 Limits on Collection**

Cambian collects only the personal information that is required to facilitate the provision of care and communicate with you. Cambian does not collect any other personal information, or allow personal information to be used for other purposes without your express consent, except in the case of anonymized data or where compelled to do so by law.

## **3.3 Use and Disclosure**

Cambian uses your personal information in order to enable you to use our software. Cambian may also disclose your personal information where such disclosure is required by law, such as complying with a subpoena or court order. All other use and disclosure of your personal information is in accordance with your instructions.

## **3.4 Consent**

By consenting to the Cambian User Agreement and using our software, you are providing Cambian with express consent to collect, store, use and disclose your personal information as described above.

Cambian may use information collected through the provision of services on an aggregate and anonymized basis to conduct analyses regarding the utilization of our software and the services provided in conjunction with our software. Any aggregated and anonymized data is the sole property of Cambian and stored separately from all personal information. The extrapolated information does not identify individuals and is not capable of identifying individuals.

You may withdraw your consent to the collection, storage, use and disclosure of your personal information as set out in this statement, subject to any applicable contractual or legal obligation, by contacting Cambian at [info@cambian.com](mailto:info@cambian.com). However, the withdrawal of consent will likely result in you no longer being able to access or use Cambian Navigator.

## **3.5 Accessing Your Personal Information**

Any requests for copies of your personal information records should be directed to Cambian at [info@cambian.com](mailto:info@cambian.com).

If an inaccuracy is identified in your personal information, you may contact Cambian at [info@cambian.com](mailto:info@cambian.com) regarding the correction or amendment to your personal information.

*Cambian uses the latest encryption, firewall, and malware detection and elimination technology to protect your personal information.*

*Cambian's software infrastructure is based in Canada and is similar to that used by the Canadian banking industry.*

*Cambian's systems are designed to continue to operate in the event of disasters as well as electrical and network outages.*

*Cambian personnel understand the sensitivity of personal information and are trained to adhere to its protection.*

*You are responsible for protecting your account information and not disclosing it to others.*

*You are responsible for securing your devices used to access our software.*

*Contact our Privacy Officer if you have any questions or concerns.*

### **3.6 Protecting Your Personal Information**

Cambian ensures that communications and data created and sent using Cambian Navigator is secured at server and application levels with industry-standard encryption, firewalls and computer malware detection and elimination. Cambian operates on infrastructure wholly based in Canada and deploys software using best practices of the information security industry. Cambian encrypts communication to our application with the same encryption commonly used to protect your online banking activities. Cambian's infrastructure is designed to continue to operate in the event of a disaster, prolonged electrical outage, or network outage by using multiple redundant connections to the Internet. Server equipment is stored in facilities equipped with state of the art security.

Cambian has taken steps to ensure that all employees, and the third parties with which we contract, understand the sensitivity of personal information and adhere to the protection of personal information as set out in this statement. We educate and train our staff on the importance of protecting personal information and ensure that access is provided only on a "need-to-know" basis. We use role-based access to ensure that only those who are authorized to access your personal information can access it.

You, and you alone, are responsible for ensuring that you do not disclose your account access information to third parties. This includes, but is not limited to, not disclosing such information to anyone, ensuring that sufficient security software is installed and running on your computer, smartphone or tablet, ensuring that your network firewall is of sufficient quality and that your wireless connection is encrypted to a degree that will prevent third party access. Cambian is not responsible for any failure by you to secure your own device and its access to the Internet or your use of public, unsecured networks. Cambian also is not responsible for any failure by you to eliminate malware. These failures and others can make you vulnerable to privacy breaches and would put you and your data at risk.

### **3.7 Challenging Compliance**

If you have any questions about the application of our corporate Privacy Policy and this Cambian Navigator Privacy Statement to your personal information, or wish to make an inquiry or submit a complaint, you should contact our Privacy Officer at [info@cambian.com](mailto:info@cambian.com).