

ADDENDUM - WEBSITE PRIVACY STATEMENT

Category	Data Governance and Privacy	Policy Owner	Clinical Data Stewardship Committee
Policy No.	4.1.0 (Addendum)	Review Frequency	Annually
Version No.	1.0	Status	Approved
Effective Date	October 20, 2017	Date Approved	October 20, 2017
Approver of Related Procedures	Privacy Officer	Approver(s)	Privacy Officer

1.0 PURPOSE

The section 5.0 below contains the content of the external-facing Website Privacy Policy that will be posted on the HDC website.

2.0 SCOPE

This policy extends to HDC website visitors and HDC application users, and HDC personnel

3.0 DEFINITIONS

Privacy Officer	The designated HDC leader responsible for overseeing the HDC privacy policies and procedures.
HDC Personnel	“Personnel” is defined as board members, officers, committee members, employees and contractors of the HDC.
HDC Users	Approved and authenticated end-users of the HDC application, who have entered into a registration agreement that licenses them to use the HDC software.
Clinical Data Contributor	Registered HDC Users who have executed a data sharing agreement to contribute and transfer a subset of their electronic medical record system (EMR) data to the custody and stewardship of the HDC, for purpose facilitating practice and quality improvement. Data contributing users include: physicians, clinic owners, nurse practitioners and other medically responsible providers who have been authorized by the clinic lead.
HDC Partner Users	An HDC approved stakeholder who may access data using the HDC application, but does not contribute any data. The approval process is outlined in the Data Access Policy and Data Use and Disclosure Policy.

Third Parties	External individuals or organizations who may have access to specified HDC data, outside of the HDC application, where approved by HDC through a process described in the Data Access Policy and Data Use and Disclosure Policy. A third party is not an authorized user of the HDC application.
Personal Information (PI)	Personal Information (PI) has the meaning given in the <i>Personal Information Protection Act</i> (BC). It is defined as information about an identifiable individual, which includes employee personal information except for contact information or work product information.
Personal Health Information (PHI)	Personal Health Information (PHI) has the meaning given in the <i>E-Health Act</i> (BC). It means recorded information about an identifiable individual that is related to the individual's health or the provision of health services to the individual.
Clinical Data Stewardship Committee	The Clinical Data Stewardship Committee provides oversight for governance of the data held and managed by the HDC.

4.0 EXCEPTIONS

There are no exceptions to this policy.

5.0 WEB PRIVACY POLICY

Protecting privacy is a core principle that is central to the Health Data Coalition's mission of operating a privacy-protected and trusted physician network.

The Health Data Coalition of British Columbia, which (also referred to below as "HDC", "we", "us" or "our") is a Canadian, federally incorporated, not-for-profit, privacy-protected organization. This Website Privacy Policy explains how the Health Data Coalition (HDC) collects, uses and discloses your information, and how our overall privacy commitments extend to the HDC website and the web-based HDC application.

By using the HDC website and application you are agreeing to the use of your information as described in this Privacy Statement. If you do not agree with any of the terms of this Website Privacy Policy, please exit website and application, and do not submit any personal information.

We reserve the right to modify this Website Privacy Policy or any other HDC policy, application, or service terms, at any time. We will reflect any such modifications on the HDC website. Your continued use of this website or the HDC application after any such changes constitutes your acceptance of this Website Privacy Policy and our terms, as revised. This Website Privacy Policy was last updated on October 20, 2017.

What Information We Collect

Personal Information

The only personal information that HDC collects from your visit to this website is what you voluntarily provide to us, and is only used to enhance your experience. For example, we would use your personal information to reply to your feedback or questions, enable subscription to the HDC newsletter or other HDC communications, or begin the application process for using the HDC application.

If you choose to use our HDC application, we will collect your name, your provider ID, clinic information and identification, as well as your contact information. We will also collect aggregated patient data from your clinic, but only if you continue as a user of our HDC application and consent to that collection through acceptance of [HDC's Data Sharing Agreement](#) and [Registration Agreement](#).

HDC's use of Identifiable patient data will always stay in control of the Clinical Data Contributors (e.g. explicit consent through a data sharing agreement is required for new purpose or use). Identifiable patient data, held in a clinic's endpoint or HDC managed data centre will be aggregated before it is available for viewing and/or shared with other HDC application users. Sharing your aggregate data with other users is under each Clinical Data Contributor user's control via the HDC application. Sharing any aggregate data collected from users of the HDC application with HDC Partners or third parties must be reviewed and approved by the HDC Clinical Data Governance Committee, and must comply with the HDC [Data Use and Disclosure Policy](#).

HDC minimizes the amount of personal information we collect and only collects the amount necessary to administer the HDC application. We inform you (at the time of collection) of the specific purpose for which it is being collected, and you will have an opportunity to consent or not consent to that use, prior to the information being sent to us.

Non-identifiable Information

When you visit our website or use the HDC application, we may collect non-identifiable information that is automatically sent to us by your web browser. This information may include your domain name and your numerical IP address. We may also collect other information, such as the type of browser you use and which pages you view on the HDC website.

We may use these non-identifiable details about visits to our website to better understand how visitors use our website and the HDC application, and to improve the quality of our website and services to better meet your needs. The amount of information that is sent by your web browser depends on the browser settings you use. Please refer to the instructions provided by your browser if you want to learn more about what information it sends to websites you visit, or how you may change or restrict this.

Cookies

The HDC website uses cookies to provide a better browsing experience for our users. A cookie is a small text file that a website creates and accesses through your browser when you visit the site. Cookies are used for many purposes, such as to track language preferences, provide customized web page content, and display website navigation history.

Cookies used by the HDC do not contain personally identifying information, do not give us access to anything on your device. The only cookies HDC uses are “session” cookies that expire with each visit (unlike “permanent” cookies that can track visitors across multiple visits, websites, and time).

How We Use and Disclose Your Data

How We Use Your Data

The HDC collects and analyzes website usage data for internal purposes, and the data is not used to identify visitors. We do not sell, rent, exchange, or otherwise disclose any information automatically collected from website visitors to third parties, except to report malicious attacks or as required by law.

How We Use Your Personal Information

The HDC uses personal information only for necessary purposes, including to respond to your voluntary feedback, questions, or requests for communications. If you apply to use the HDC application, the HDC may use your personal information to verify your identity and stated qualifications.

We only use personal information for the reason it was collected, unless you authorize otherwise. At the time of collection, we will inform you of the specific purpose for which it is being collected, and you will have an opportunity to consent, or not consent to that use prior to the information being sent to the HDC.

If you have sent your personal information to the HDC and wish to have it amended or deleted, or wish to change your preferences on our use of that information, please Contact Us [privacy@hdcbc.ca].

Email Communications

Any personal contact information that you provide to us will only be used to respond to your message, application or query, or to provide you with your requested access to the HDC application.

If you no longer wish to receive e-mail communications from us, you may unsubscribe at any point by contacting us at privacy@hdcbc.ca

Third Parties and External Sites

The HDC does not sell, rent, exchange, or otherwise disclose any information that we collect about our website visitors to third parties, except in the case of a malicious attack or as required by law.

We limit the amount of information that third-party tools can collect about you on our website. However, when you visit pages on the HDC website that contain embedded YouTube videos or use Google Search, these external sites may automatically collect information about your website usage from your browser. Please refer to the instructions provided by your browser if you want to learn more about what information it sends to websites you visit, or how you may change or restrict this.

This website may contain links that direct you to external sites. We are not responsible for the content and the privacy practices of sites other than our own. We encourage you to examine each site’s privacy policy and disclaimers and to make your own decisions regarding the accuracy, reliability and completeness of material and information found on those sites.

How We Protect Your Personal Information

Protection of patient and physician privacy is a core principle of the HDC. The HDC protects your personal information by maintaining physical, organizational, and technological safeguards appropriate to the sensitivity of such personal information. Our detailed safeguards are outlined in the [HDC Privacy Policy](#). Ten interrelated principles form the basis of HDC's Privacy Policy:

1. Accountability for Personal Information

HDC is responsible for managing your personal information under its control and will designate an individual or individuals who are accountable for its compliance with the following principles.

2. Openness about Personal Information Policies and Practices

Information about HDC's policies and practices relating to the management of your personal information is made readily available through HDC's website or by contacting us [privacy@hdcbc.ca].

3. Identifying Purposes for Personal Information

At or before your information is collected, HDC will identify the purpose(s) for which your personal information is being collected.

4. Consent for Personal Information

Your knowledge and consent are required before HDC collects, uses, or discloses your personal information, except where inappropriate or not required by law.

5. Limiting Collection of Personal Information

HDC collects information by fair and lawful means. HDC limits its collection of your personal information to that which is necessary for the purposes it has identified. The HDC will never collect patient-level data into the central server - patient data will always stay in the control of the physician.

6. Limiting Use, Disclosure, and Retention of Personal Information

HDC does not use or disclose your personal information for purposes other than those for which it was collected, except with your explicit consent. Your personal information is retained only as long as necessary for the fulfillment of those purposes.

7. Ensuring Accuracy of Personal Information

HDC ensures that your personal information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

8. Safeguards for Personal Information

HDC protects your personal information through physical, administrative, and technical security safeguards appropriate to the sensitivity of the information.

9. Individual Access to Personal Information

Upon request, HDC will inform you of the existence, use, and disclosure of your personal information and will give access to that information. You will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance with the Privacy Policy

You have the ability to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for HDC's compliance and to the Office of the BC Information and Privacy Commissioner.

Access to Your Data

If you would like access to your personal information, or would like to correct your personal information, please contact us through our [Contact](#) page.

How to Contact Us

Please contact Cathy McGuinness, Privacy Officer at privacy@hdcbc.ca or 1.604.307.7620 if you have any privacy-related questions or concerns. To contact the HDC for any purpose, please visit our [Contact](#) page.

Disclaimer

Although we attempt to ensure that all information posted on our site is accurate and complete, we do not represent that it is so, or guarantee it, and accept no liability or obligation for accuracy or completeness. If there is any discrepancy between information posted on our website and in an original paper version, the version that is most current should be considered as the authoritative version.

We take reasonable precautions to protect your personal information in our possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.