

# OTN Privacy Statement

**Last Revised:** July 2014

## OTN, Telemedicine and Personal Information

The Ontario Telemedicine Network (“OTN”) is an independent, not-for-profit organization funded by the Government of Ontario. As a world leader in telemedicine, OTN provides telemedicine solutions for healthcare organizations and professionals. OTN’s services include videoconferencing, webcasting and webconferencing and our programs include eConsult, Teleburn, Teledermatology, Teleophthalmology, Telestroke, Teletrauma and Telehomecare.

OTN collects, uses and discloses personal information (information about an identifiable individual, including personal health information, referred to in this Privacy Statement collectively as “Personal Information”) for the purposes set out in this Privacy Statement. The Personal Information is collected through various means, including through its website at <http://otn.ca/en> (“Website”) and an electronic gateway called the OTNhub. As a not-for-profit organization, many of OTN’s activities are not subject to privacy law. This Privacy Statement provides notice of OTN’s Personal Information practices, regardless of the source or manner in which Personal Information is collected.

From time to time, we may update this Privacy Statement to reflect changes in our Personal Information practices or any applicable law. This Privacy Statement is current as of the “last revised” date which appears at the top of this page.

## Consent

By expressly providing OTN with your Personal Information, or by using the Website or the OTNhub, you understand and have consented to the use and disclosure of your personal information for the purposes set out in this Privacy Statement.

This Privacy Statement does not apply to OTN’s use of commercial electronic messages as defined in the Canada Anti-Spam Act (respectively, “CEMs” and “CASL”). For information about OTN’s policy on CEMs, please contact OTN’s Privacy Officer at the information provided at the bottom of this Privacy Statement.

## Personal Information

As mentioned above, Personal Information means information about an identifiable individual. It does not include information about individuals in their professional capacity, including their title, business address and business telephone number, or confidential information about entities such as corporations and associations.

## Collection of Personal Information

In general, OTN only collects information about individuals that they voluntarily supply to us in connection with their use of our services. The information may include: the salutation by

which an individual prefers to be addressed (Mr., Mrs., Ms.); first & last names and middle initials; profession, Provider Service (specialty and type of service offered), organization name and address (including the City, Province, postal code, phone, fax, and email address).

### Use of Personal Information

We use Personal Information (outside of employee Personal Information) for the following purposes:

- to validate and authenticate identity for the purpose of permitting individuals access to OTN information systems and other assets;
- to create, maintain and manage a “user’s” account;
- to respond to inquiries;
- to provide our services;
- to send information about our services, including updates, (as permitted under CASL where the message is a CEM);
- to report, to the Ministry and others as required under agreements or the law; and
- to evaluate the Website, the OTNhub and our services for the purposes of improving existing services and analyzing where different or improved services would serve our clients and their patients and clients.

### Disclosure of Personal Information, Use of Service Providers

OTN discloses Personal Information as required to provide its services. For example, OTN may disclose Personal Information to e-Health Ontario for the purpose of obtaining ONE ID account credentials to access OTN information systems and assets.

OTN may disclose Personal Information in the context of a reorganization or restructuring of its operations, financing or other business transaction, such as a sale of its assets or a purchase of another organization’s assets, and to carry out or permit others to carry out the due diligence required to determine whether to proceed. OTN may also disclose Personal Information where required for it to obtain insurance or make an insurance claim, or as permitted or required by law.

OTN uses third party service providers and we may provide your Personal Information to them where the information is needed for their services. We contractually impose privacy obligations on providers whose services require access to Personal Information.

### Personal Information Held Outside of Canada

Some of OTN’s service providers operate outside of Canada. When Personal Information is transferred to such service providers, it becomes subject to the laws of the country in which

the service provider operates and may be subject to production or disclosure, by operation of those laws, to the country's government and/or government agencies, including law enforcement and regulatory agencies, and courts.

### **Security of Personal Information**

We have implemented physical, organizational (including contractual) and technological security measures to protect Personal Information from loss, theft, unauthorized access, disclosure, copying, use or modification. For example, we limit the use of Personal Information to those members of our personnel who require it to perform their job. We store Personal Information on a secured server.

### **Access Requests, Accuracy of Personal Information**

Except in limited circumstances, we will provide individuals, on their written request, with access to any of their Personal Information in our records.

We rely on individuals to notify us of any changes to their Personal Information. We will update Personal Information at an individual's request, except where to do so would be inappropriate, for example where the information consists of a third party's observations, judgment or opinion.

For your protection as well as that of OTN, we may request that you provide us with proof of your identity before permitting you access to Personal Information.

### **Linked Websites**

The Website may contain links to external websites. OTN is not responsible for the content on websites other than the Website, or the privacy practices associated with any other website. Before accessing a website, we encourage you to review its privacy policy.

### **Use of Cookies, Google Analytics**

In order to evaluate the Website, and for site security and the protection of privacy and confidential information, OTN may collect certain information from the computer of a user, including, without limitation, IP address, browser type, domain names, access times and referring website addresses. To obtain this technical information, OTN may use various kinds of software devices, including "cookies." A "cookie" is a small text file that is stored on a user's computer for record-keeping purposes. We use both session ID cookies, which expire when the browser is closed and persistent cookies which remain on a hard drive after the browser is closed. We use session cookies to make it easier for users to navigate the Website. We use persistent cookies to allow subscribers to navigate based on past usage which provides ease of use for return visits to the Website. Persistent cookies may be removed by following directions provided in the browser's "Help" file. Browsers may be set to disable cookies, but like other websites, the Website may not function properly if cookies are disabled.

We do not link the information we collect through cookies to any other information, including Personal Information.

OTN uses “Google Analytics”, a service that provides us with information about the Website and use of the Website that we use to improve the functionality of the site so as to make information about our telemedicine services more widely available. Google Analytics may set or read cookies on the browsers of Website users and otherwise receives information from users’ browsers. For information about how Google uses information it collects through our use of Google Analytics, please refer to “How Google uses data when you use our partners’ sites or apps”, located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You may also want to review Google’s privacy policy, which is available through a link on that webpage. There is also information on that page about what you can do if you do not want Google Analytics to be used in your browser.

### Privacy Officer Contact Information

Any comments, questions, concerns or complaints regarding our management of Personal Information, this Privacy Statement and our privacy practices, should be forwarded to our Privacy Officer as follows:

Ontario Telemedicine Network  
105 Moatfield Drive, Suite 1100  
Toronto, ON M3B 0A2  
Attention: Chief Privacy Officer  
E-mail: [privacy@otn.ca](mailto:privacy@otn.ca).