

Last updated October 2018

Privacy Statement

Application of this Privacy Statement

Thank you for visiting the Ontario Telemedicine Network (“OTN”) Website (the “Website”). This Privacy Statement describes OTN’s policy and practices in relation to Personal Information (defined below) collected through the Website. More specifically, this Privacy Statement explains how we collect, use and disclose Personal Information, the choices you have regarding such use and disclosure, and how you may access and correct that information.

OTN places a high value on privacy and is committed to respecting the privacy of our Website users. We recommend you read this Privacy Statement carefully as by visiting or using the Website, you will be consenting to the policies and practices described in this Statement. If you do not consent, please exit and do not use the Website.

From time to time, we may make changes to this Privacy Statement. The Privacy Statement is current as of the “last updated” date which appears at the top of this page.

Personal Information

In this Privacy Statement, “Personal Information” means information about an identifiable individual that OTN receives through the Website. This information may include but is not limited to your name, home address and content that you provide to OTN or post on this Website. Personal Information does not include information about you in any professional capacity, including your name, business title or office, business address, telephone number or email.

Collection & Use of Personal Information

OTN does not automatically collect your Personal Information: Personal Information is only collected if you supply it voluntarily, usually through contacting us via e-mail, or registering in a secure portion of the Website.

OTN will use your Personal Information to respond to your inquiries or requests. We may also access your Personal Information in the course of maintaining the Website or monitoring Website activity, and use your Personal Information as otherwise permitted or required by law. OTN will not use your Personal Information for spamming, unsolicited bulk or commercial email, or third-party or commercial marketing purposes.

External Links

When navigating to self-managed virtual care tools or healthcare team-managed virtual care programs, you may find links to external websites not managed by OTN. For programs and tools not managed by OTN, these links are provided on an “as-is” basis and OTN has not certified, conducted any privacy or risk assessments, and/or conducted other due diligence initiatives. When you click on an external link not managed by OTN, you will be subject to the Privacy Policy/Statement and Terms of Use of the organization hosting that tool. OTN recommends you read and become familiar with that Privacy Policy/Statement and Terms of Use. When you do visit OTN’s website and access a virtual care program or tool not managed by OTN, the following non-identifiable information could be collected from you such as; number of visitors, number of registrations to the self-managed virtual care tool that originated from OTN link clicks, number of site visits, total sessions, average number of sessions per user and session duration, average time on page, unique page views, hour of the day visited, and total number of post-login site visits to the self-managed virtual care tool including registration page visits. This information will be collected and used to access adoption and reporting on virtual care visits from OTN’s website and shared with partner organizations, Ontario Ministry of Health and Long-Term Care,

and Local Health Integration Networks (LHINs) to meet reporting and evaluation obligations. Should you have any questions about the programs and tools not managed by OTN, please contact the respective organization directly.

Cookies

In order to evaluate the Website, and for site security and law enforcement purposes, OTN may collect certain information from your computer, including without limitation, your IP address, browser type, domain names, access times and referring website addresses (collectively referred to as “Technical Information”). 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 do not link the information we collect and store in cookies to any Personal Information you submit while on the Website. However, some Technical Information can be used to derive certain Personal Information. For more information, see the Privacy Commissioner of Canada’s report posted at https://www.priv.gc.ca/en/opc-actions-and-decisions/research/explore-privacy-research/2013/ip_201305/ (accessed as of July 2017).

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. We use session cookies to make it easier for you to navigate the Website. We use persistent cookies to allow you to navigate based on past usage so as to provide ease of use for return visits to the Website. You can remove persistent cookies by following directions provided in your Internet browser’s “Help” file. You can also set your browser to disable cookies, but this Website may not function properly if you do.

OTN does not disclose Technical Information except in accordance with applicable law.

Google Analytics

OTN uses “Google Analytics” and “Google Tag Manager,” a web analysis service provided by Google. 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 easily and widely available. Google collects cookies and usage data and processes such information in the United States.

Google Analytics may set or read cookies on the browsers of Website users and otherwise receives information from users' browsers. Google utilizes the data collected to track and examine the use of the Website, to prepare reports on those activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. For more information on Google's use of information collected through Google Analytics, please consult Google's privacy policy, posted at <http://www.google.com/intl/en/policies/privacy/> and the section of the privacy policy entitled "How Google uses data when you use our partners' sites or apps", located at www.google.com/policies/privacy/partners/.

If you wish to opt out of Google Analytics data collection, please consult Google's instructions on downloading and installing the "Google Analytics Opt-out Browser Add-on", posted at <https://tools.google.com/dlpage/gaoptout>.

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.

Please note: Third-party websites, linked from OTN websites, may use different systems to track website usage. Please consult their privacy policy for more information.

DISQUS

The Website commenting function is provided by [DISQUS](#), a US-based company, and moderated by OTN staff. OTN hopes to create meaningful conversations about the transformation of health care through technology. We encourage respectful comments that contribute to this goal. Commentary that OTN deems offensive, off-topic, inflammatory, or otherwise inappropriate will be removed by staff. Commentary does not represent the views of OTN. By using DISQUS to leave commentary you agree to their [Terms of Service](#) and [Privacy Policy](#). For the purposes

of moderation, all comments left via DISQUS will be visible to a limited number of OTN staff and will contain your user name, email address, and IP address. User data submitted via DISQUS will be retained indefinitely by DISQUS unless otherwise indicated in their [Terms of Service](#) or [Privacy Policy](#).

Linked Websites

The Website may contain links to external Websites. OTN is not responsible for the content on other Websites or the privacy practices associated with any other Websites. Before accessing a Website from the Website, we encourage you to review the applicable privacy policy and terms of use.

Privacy Officer

All comments, questions, concerns or complaints regarding OTN's management of your Personal Information or this Privacy Statement, including requests for access to or the correction of your Personal Information, should be forwarded to our Privacy Officer as follows:

Ontario Telemedicine Network
438 University Avenue, Suite 200
Toronto, ON M5G 2K8
Attention: Privacy Officer
E-mail: privacy@otn.ca