

# Well Doc Alberta Website Privacy Policy

Effective date: August 29, 2019

Well Doc Alberta ("us", "we", or "our") operates the http://www.welldocalberta.org website (hereinafter referred to as the "Service" and also accessible via http://www.welldocalberta.ca).

# **Purpose**

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

#### **Definitions**

- **Service**: Service is the http://www.welldocalberta.org website operated by Well Doc Alberta.
- **Personal Data:** Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- Usage Data: Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Cookies: Cookies are small files stored on your device (computer or mobile device).

### Information Collection and Use

We collect several types of information for various purposes to provide, assess, and improve our Service and the Well Doc Alberta initiative as a whole.

### Types of Data We Collect

1) Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information (PII) may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Cookies and Usage Data



We may use your Personal Data to contact you with newsletters or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

# 2) Usage Data

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers, and other diagnostic data.

# 3) Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags, and scripts to collect and track information and to improve and analyze our Service and the Well Doc Alberta initiative as a whole.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

### Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

#### Use of Data

Well Doc Alberta uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide user support



- To gather analysis or valuable information so that we can improve our Service or the Well Doc Alberta initiative as a whole
- To monitor the usage of our Service
- To detect, prevent, and address technical issues
- To provide you with news, special offers, and general information about other services and events that we offer, similar to those that you have already used or enquired about, unless you have opted not to receive such information

### Transfer of Data

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state/province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Canada and choose to provide information to us, please note that we transfer the data, including Personal Data, to Canada and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Well Doc Alberta will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

# Disclosure of Data

1) Disclosure for Law Enforcement
Under certain circumstances, Well Doc Alberta may need to disclose your Personal Data if
required to do so by law or in response to valid requests by public authorities (e.g. a court or
a government agency).

#### 2) Legal Requirements

Well Doc Alberta may disclose your Personal Data in the good faith belief that such action is necessary to:

- comply with a legal obligation
- protect and defend the rights or property of Well Doc Alberta
- prevent or investigate possible wrongdoing in connection with the Service
- protect the personal safety of users of the Service or the public
- protect against legal liability



# Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

#### **Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### Analytics

Well Doc Alberta uses Google Analytics, a third-party Service Provider, to monitor and analyze the use of our Service.

# **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visit activity.

Well Doc Alberta does not transmit any personally identifying data to Google Analytics that you submit to us when you sign up to our newsletter, contact us through our contact page, or submit your information to our directory. In addition, Well Doc Alberta anonymizes your IP address prior to transmitting this data to Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>



# Online Marketing Platform

Well Doc Alberta uses Mailchimp, a third-party Service Provider, to distribute our newsletter (contacts) and display our newsletter campaigns (visitors) in the Service.

# Mailchimp

Mailchimp is an online marketing platform operated by The Rocket Science Group LLC, a company headquartered in the State of Georgia in the United States.

To learn more on the privacy practices of Mailchimp, visit: <a href="https://www.intuit.com/privacy/statement/">https://www.intuit.com/privacy/statement/</a>

#### Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

### Compliance with Canadian and Provincial Privacy Laws

The Well Doc Alberta website is in compliance with all relevant provincial and national privacy laws.

- 1) The Personal Information Protection and Electronic Documents Act (PIPEDA) PIPEDA regulates Canadian private sector organizations' collection, use, and disclosure of PII in the course of commercial activity. Further, PIPEDA does not apply to organizations operating within provinces that have their own privacy legislation that is substantially similar to PIPEDA. Alberta, British Columbia, and Quebec have their own private sector legislation that has been deemed substantially similar to PIPEDA. As Well Doc Alberta operates within the province of Alberta and does not engage in commercial activity, PIPEDA does not apply.
- 2) Canada's Anti-Spam Legislation (CASL)
  Well Doc Alberta does not send any commercial electronic messages. Any electronic
  message contact from Well Doc Alberta requires your consent (explicit or implied) through
  the provision of your email address to us by signing up to our newsletter, mailing list, or use
  of the Service. You may opt out of receiving any, or all, of these communications from us by
  following the unsubscribe link or the instructions provided in any email we send.



- 3) Personal Information Protection Act (PIPA)
  PIPA is Alberta's private sector privacy law, which applies to provincially regulated private
  sector organizations, businesses, and some non-profit organizations. Well Doc Alberta takes
  reasonable measures to protect your personal data from unauthorized collection, use, or
  disclosure and only uses your personal data for reasonable purposes including those for
  which you have provided your data to us.
- 4) Freedom of Information and Protection of Privacy Act (FOIP)

  The FOIP act applies to publicly funded institutions and public bodies. Well Doc Alberta resides within the University of Calgary, and we have therefore taken steps to remain in compliance with the FOIP act, by storing your information in accordance with section 38 and only sharing your information as permitted. We only share your personal information with your consent or in order to fulfill a request you have made to us. Well Doc Alberta has taken reasonable security measures against risks including unauthorized access, collection, use, or disclosure of your data.

# Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

# Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### Contact Us

If you have any questions about this Privacy Policy, please contact us by email at welldocalberta@ucalgary.ca