

# Privacy Policy for Body Brave

## Policy Statement

At Body Brave, privacy is governed by the Personal Health Information Protection Act (PHIPA), a law that establishes rules concerning the collection, use and disclosure of personal health information. As a health information custodian, Body Brave and its agents (including staff, healthcare providers, facilitators, students and volunteers) are responsible for ensuring that the personal health information of our patients is treated with respect and sensitivity for both group and individual therapy.

## Application

This policy applies to all employees, volunteers (including the Board of Directors), contracted employees, interpreters, clients, program participants and students who may have access to personal information at Body Brave. Staff who are regulated health professionals will be guided by the standards of practice governing their profession unless Body Brave applies a higher standard, in which case Body Brave policy will prevail. The responsibility for the protection of personal information, including personal health information, outlives the professional relationship and continues indefinitely after the provider has ceased to care for the client. This includes:

All managers are responsible for ensuring staff (including students and volunteers) in their departments are aware and compliant with the policy.

## Accountability for Personal Health Information

Body Brave is responsible for personal health information under its control in compliance with the Personal Health Information Protection Act (PHIPA), 2004.

In Ontario, personal information includes any and all information related to the provision of health care for an individual's physical or mental health. This includes:

- family history
- personal identification information
- plans of service
- payment information
- eligibility for health care
- information regarding body parts or substances
- health numbers

PHI also includes any other information not specifically listed that can identify the individual or a substitute decision maker who acts on the individual's behalf. Body Brave is responsible for personal health information in its possession or custody, including information that has been transferred to an agent of Body Brave. Body Brave has implemented policies and practices to give effect to this policy, including:

- Procedures to protect personal health information.
- Signing of a Confidentiality Agreement by all agents of Body Brave prior to commencement of employment or affiliation with Body Brave.
- Procedures to receive and respond to complaints and inquiries about Body Brave information practices.
- Orientating and training staff and communicating to staff and other agents on information about PHIPA policies and practices
- Responding to requests for access to, or corrections of, personal health information in the custody of Body Brave.

In compliance with the Personal Health Information Protection Act, Body Brave will inform patients of the loss, theft or inappropriate access of their personal health information as soon as reasonably possible. Breaches of this policy and related privacy policies may be subject to disciplinary action. Body Brave and

its agents are also subject to the fines and penalties set out in the Personal Health Information Protection Act.

### **Identifying Purposes for the Collection of Personal Health Information**

Body Brave shall identify the purposes for which personal health information is collected. This has been done by our Statement of Information Practices and is available to patients. Permitted purposes are the delivery of direct patient care, the administration of the health care system, research, teaching, statistics, fundraising, and meeting legal and regulatory requirements as directed in the Personal Health Information Protection Act.

Body Brave collects personal health information about you from you or from the person acting on your behalf. The personal health information that we collect may include, for example, your name, date of birth, address, health history, records of your visits to Body Brave and the care that you received during those visits. Occasionally, we collect personal health information about you from other sources if we have obtained your consent to do so or if the law permits.

Identifying the purposes for which personal health information is collected at or before the time of collection allows Body Brave to determine the information it needs to collect to fulfill these purposes. The identified purposes are specified at or before the time of collection to the individual from whom the personal health information is collected. Depending upon the way in which the information is collected, this can be done verbally or in writing. A patient who presents for treatment is also giving implied consent for the use of his or her personal health information for authorized purposes.

Notices identifying the purposes for the collection of personal health information are readily available to patients. When personal health information that has been collected is to be used for a purpose not previously identified; the new purpose will be identified prior to use. Unless law requires the new purpose, the consent of the individual is required before information can be used for that purpose. Persons collecting personal health information will be able to explain to individuals the purposes for which the information is being collected.

### **Consent under PHIPA**

PHIPA Ontario's general principles state that clinics need either express or implied consent to collect, use and disclose PHI. The specifics of when you need express consent or when implied consent is OK are highly strict under PHIPA. First, let's review the difference between the two:

Definition of Implied Consent - permission for an action can be assumed based on the circumstance and related information. When PHI disclosure is for the purpose of providing further health care - for example, in the case of disclosing PHI when referring care to another practitioner - consent can be implied.

Definition of Express Consent - the act of an individual expressly giving permission for an action. When PHI disclosure is for any other purpose not related to extending health care services, consent must be express.

Although, Consent is NOT required for collection, use and disclosure when the clinic/practitioner believes based on reasonable grounds that collection, use or disclosure is necessary to eliminate or reduce a significant risk of bodily harm to one or more persons.

There are also other very specific exceptions to consent regulations.

It's OK to USE PHI without consent:

- when you are using the information for the purpose for which it was already collected
- if you are required by law to disclose it
- for risk/error management or to improve the quality of care
- to educate agents who provide health care
- for purposes involving disposing of or modifying the information to conceal the identity of the individual
- when your purpose is to obtain consent for a legal proceeding, to obtain payment for healthcare, for research (subject to certain conditions), or if permitted and/or required by law.

It's OK to DISCLOSE PHI without consent:

- If an individual has provided religious affiliation, consent may be implied to disclose an individual's name and the name and location in the health care facility to a religious representative.
- A pharmacist may disclose PHI to a third party who is being asked to provide payment for medication or related goods.
  - when disclosure is to provide further health care
  - when disclosure is related to a deceased individual
  - to mitigate risks (exercise good judgement in determining what is a significant risk)
  - for proceedings
  - when PHI is given to a successor for research approved by the ethics board, to monitor health care payments, to analyze the health care system
  - or if disclosure has been otherwise approved by the Commissioner.

### **Our privacy commitment**

Body Brave is committed to maintaining the accuracy, security and privacy of the personal information that we collect from our clients, donors, volunteers and other individuals from whom we collect personal information ("you") in accordance with applicable privacy laws.

### **Your consent**

By submitting personal information to Body Brave or our agents and service providers, you agree that we may collect, use and disclose such personal information, in accordance with this privacy policy as permitted or required by applicable laws. Subject to legal and contractual requirements and reasonable notice, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting Body Brave. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you. If you provide us with the personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such individual to enable us to collect, use and disclose such personal information for the purposes set forth in this privacy policy.

### **What kind of information do we collect?**

Personal Information  
 Program Evaluation and Feedback Information  
 Personal Health Information

### **How Body Brave Uses and Discloses Personal Health Information**

Access to your personal health information is available to those who need it in order to provide care. This may include physicians, nurses, technologists, therapists and other health professionals. We use and disclose your personal health information to:

- treat and care for you

- facilitate continuity of care when you are transferred to another facility
- obtain payment for your treatment and care from OHIP, WSIB, private insurer or others
- plan, administer and manage our internal operations
- conduct risk management and quality improvement activities including patient satisfaction surveys
  - teach
  - conduct and support approved research
  - compile statistics
  - conduct fundraising initiatives to improve our healthcare services and programs
  - comply with legal and regulatory requirements, and fulfill other purposes permitted or required by law

Non-clinical information about your visit such as your name, location in the hospital and telephone number in the hospital may be released to family and friends in order to confirm you are a patient or notify a representative of a religious affiliation to visit you if you wish

### **Consent for the Collection, Use & Disclosure of Personal Health Information**

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal health information, except where inappropriate.

*Note:* In certain circumstances, personal health information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent. Seeking consent may be impossible or inappropriate, for example when the individual is seriously ill or mentally incapacitated. In these circumstances, consent of the individual's substitute decision maker will be sought, where feasible.

Consent is required for the collection of personal health information and the subsequent use or disclosure of this information. Typically, Body Brave will seek consent for the use or disclosure of the information at the time of collection. In certain circumstances, consent with respect to use or disclosure may be sought after the information has been collected but before use (for example, when Body Brave wants to use information for a purpose not previously identified). Body Brave will make a reasonable effort to ensure that the individual is advised of the purposes for which the information will be used. To make the consent meaningful, the purposes must be stated in such a manner that the individual can reasonably understand how the information will be used or disclosed. Body Brave will not, as a condition of providing care, require an individual to consent to the collection, use, or disclosure of information beyond that required to fulfill the specified and legitimate purposes. In obtaining consent, the reasonable expectations of the individual are also relevant. Body Brave can assume that an individual's request for treatment constitutes implied consent for specific purposes. The way in which Body Brave seeks consent may vary, depending on the circumstances and the type of information collected.

Individuals can give consent in many ways. For example:

- A form may be used to seek consent, collect information, and inform the individual of the use that will be made of the information. By completing and signing the form, the individual is giving consent to the collection and specified uses and/or disclosures.
- Consent may be given verbally or in writing at the time that individuals use a health service
- Consent may be given verbally when information is collected over the telephone.

In cases where express consent is required and it is provided verbally, this exchange is documented in the patient's record of personal health information.

An individual may withdraw consent at any time, subject to legal restrictions and reasonable notice. Withdrawal of the consent will not have a retroactive effect. Body Brave will inform the individual of the implications of such withdrawal.

### **Limiting Collection of Personal Health Information**

The collection of personal health information will be limited to that which is necessary for the purposes identified by Body Brave. Information will be collected by fair and lawful means. Body Brave will not collect personal health information indiscriminately. Information collected will be limited to that which is necessary to fulfill the purposes identified. This requirement implies that consent with respect to collection must not be obtained through deception.

### **Limiting Use, Disclosure & Retention of Personal Health Information**

Personal health information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal health information will be retained only as long as necessary for the fulfillment of those purposes. If using personal health information for a new purpose, Body Brave will document this purpose. Personal health information that is no longer required to fulfill the identified purposes will be destroyed, erased, or made anonymous in accordance to applicable legislation

### **Openness About Personal Health Information Policies & Practices**

Body Brave makes readily available to individuals' specific information about its policies and practices relating to the management of personal health information. A written public statement is made available to the public. This notice:

- provides a general description of Body Brave's information practices
- describes how to contact the designated privacy person
- describes how an individual may obtain access to or request correction of a record of personal health information
- describes how an individual may make a complaint to Body Brave or to the

### **Information and Privacy Commissioner of Ontario**

Body Brave makes information on its policies and practices available in a variety of ways. For example, Body Brave may choose to make brochures available, post signs, or provide online via its public web site.

### **What is personal information?**

Canadian privacy laws define personal information broadly as information about an identifiable individual or as information that allows an individual to be identified. For the purposes of this policy, personal information means information about an identifiable individual as defined from time to time in applicable privacy laws. Generally speaking, personal information does not include what is considered to be business contact information: your name, title or position, business address, telephone number, fax number or email address

### **What personal information do we collect?**

The types of personal information that Body Brave may collect about you includes your email address, name, home or work address, postal code and phone numbers. Body Brave may also collect anonymous demographic information such as your age, gender, marital status and program preferences. Such

information is used by Body Brave to provide general statistics regarding the use of our services and to determine appropriate services.

### **Why do we collect your personal information, including feedback, and personal health information?**

Body Brave limits the collection, use and disclosure of your information, both in the amount and type of information, to that which is necessary to fulfill the purposes identified within this privacy policy. We will identify the purposes for which your personal information is collected at or before the time your personal information is collected.

In general Body Brave may collect, use and disclose your personal information for the following purposes:

- to register you for our services (groups, workshops or other events)
- to understand your needs and assist in serving you better
- to send you information such as newsletters, events information, invitations, updates or to invite you to recognition or information sessions
- to administer your donation and contact you about renewal
- to respond to your information requests
- to thank donors and, with their consent, to recognize their gift
- as permitted by, and to comply with, any legal or regulatory requirements or provisions;
- and
- for any other purpose to which you consent.
- to improve or maintain the quality of the care and services that we provide
- to provide effective programming and treatment
- for the purposes of internal evaluation and quality improvement research
- for academic research on a limited bases and subject to research ethics approval processes

### **To whom do we disclose your personal information?**

From time to time, Body Brave may disclose your personal information to:

- service providers, including an organization or individual retained by Body Brave to perform functions on its behalf, data processing, document management and office services
- a person who, in the reasonable judgment of Body Brave, is providing or seeking the information as your agent
- any other third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

### **Body Brave Staff that do not Provide Health Care Services**

Email may be used to communicate with clients in programs that do not provide health care if there are administrative, technological and physical precautions to protect personal information (as outlined below).

#### *Administrative Controls:*

- Non-health care providers are expected to abide by the following rules when using email
  - Email addresses or email content from a client will not be shared with others (including other staff/programs within Body Brave) unless express consent is obtained.

- Email must not contain personal or identifying about one client to another client (for example, sending out a group email message to multiple recipients in the “To” field of a message).
- This entire policy will be reviewed with new staff and on a bi-annual basis with existing staff at All Staff meetings, lunch and learns, in combination with email reminders.
- Staff will sign an agreement recognizing they understand and will comply with the “Privacy of Client Information Policy”.
- Each email will contain a confidentiality statement and a statement stating that Body Brave discourages the transmission of personal health information by email.
- The Privacy Statement will include information for clients regarding email and the Privacy Statement will be posted on the Body Brave website and throughout the building.

### **Where do we store your personal information?**

Your personal information is stored in secured locations and on servers controlled by organizations retained by Body Brave to perform functions on its behalf, located either at our offices or at the offices of our service providers. Body Brave retains your personal information only for as long as is necessary in order to fulfill the purposes identified within this privacy policy, or for as long as may be required to comply with applicable laws.

### **How do we protect your personal information?**

To help protect the confidentiality and security of your personal information, Body Brave employs administrative and technological safeguards appropriate to the sensitivity of your personal information. If your personal information is sent to a third party for processing, we make sure, through our contracts with such third parties, that all of your personal information is kept secure. We also operate secure data networks protected by industry standard firewall and password protection systems. Your personal information is kept as accurate, complete and up-to-date as is necessary to fulfill the purposes identified in this privacy policy. We do not routinely update your personal information. It is the responsibility of Body Brave to secure client information against loss, fire, theft, tampering, access, or copying by unauthorized persons. Access to your personal information is restricted to Body Brave employees, trained volunteers and authorized service providers who need it to provide appropriate services to you.

### **The Law and Electronic Medical Records**

Ontario Regulation 114/94, Sections 20 and 21

The records required by regulation may be made and maintained in an electronic computer system only if it has the following characteristics:

- The system provides a visual display of the recorded information.
- The system provides a means of access to the record of each patient by the patient’s name and, if the patient has an Ontario health number, by the health number.
- The system is capable of printing the recorded information promptly.
- The system is capable of visually displaying and printing the recorded information for each patient in chronological order.

The system maintains an audit trail that, records the date and time of each entry of information for each patient, indicates any changes in the recorded information, preserves the original content of the recorded information when changed or updated, and is capable of being printed separately from the recorded information for each patient.

The system includes a password or otherwise provides reasonable protection against unauthorized access. The system automatically backs up files and allows the recovery of backed-up files or otherwise provides reasonable protection against loss of, damage to, and inaccessibility of, information. Body Brave uses Jane and Zoom electronic systems to provide a means of accessing and recording patient information, which is capable of all Ontario regulations stated above.

### ***Zoom***

Zoom is committed to protecting the security and privacy of our customers' data. This includes enabling our customers in Canada to be compliant with Canadian Data Protection regulations, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and, locally, the Personal Health Information Protection Act (PHIPA). Zoom's commitment to protecting the security and privacy of our customers' data includes:

- Submitting our privacy practices to independent assessment and certification with TrustArc
- Undergoing an annual SSAE-16 SOC 2 audit by a qualified independent third-party

Performing regular vulnerability scans and penetration tests to evaluate our security posture and identify new threats

### ***InputHealth***

InputHealth builds privacy-centric collaborative health care solutions to help clinical professionals run their practices and improve patient outcomes. In short, we run a next generation electronic health record platform that lets patients and their care teams remain connected. Your personal information, including sensitive health information, may be stored and accessed within our platform. We take this responsibility very seriously. The purpose of this Privacy Policy is to let you know that regardless of who you are or where you are located, your privacy is our priority.

In this Privacy Policy, the words "we", "us", "our", or InputHealth refers to Input Health Systems Inc. and its affiliate companies. "Services" includes our full range of electronic health products, including without limitation, the inputhealth.com website, the Collaborative Health Record ("CHR") product, the Patient Reported Outcomes ("PRO) product, and the InputHealth Virtual product.

Before outlining our privacy efforts, it is important for you to understand how we make money. Our Services help medical professionals collect, manage, and secure patient health records. We are paid on a subscription basis by individual clinics and larger health care institutions. We do not and will never sell personal information to third parties. We are in the business of health care, not advertising. Health professionals work hard to earn your trust. We are committed to maintaining this trust by providing a secure platform built on a transparent business model.

This Privacy Policy informs you of our practices with respect to how we collect and use your personal information in connection with our Services. Together with our Terms of Service, this policy is intended to help patients, patient family members, and clinical service providers understand how we manage personal information. Many of our privacy commitments are driven by specific legal requirements. Others are best practices that we feel are important to improving security or the delivery of health care. Where there are trade-offs between your privacy and making information available at the point of care, we will continue to work hard to ensure that you remain equipped to provide informed consent regarding your preferences.

Please visit this page for full details: <https://inputhealth.com/privacy-policy/>

## *Careteam*

Careteam is a flexible platform enables virtual care coordination and collaboration within and between health organizations, including the patient, family and community.

### Use and Disclosure of Personal Information

By using the Services in connection with a health professional, Patients acknowledge that data recorded by or shared with health professionals and Health Organizations may be subject to the same policies and practices as other medical record information retained by that organization. For example, to the extent permitted and/or required by the provisions of relevant laws, regulations, policies, and professional practice standards:

- any information shared with an health professional or Health Organization through the Services may be shared with other authorized persons within that Health Organization or disclosed to others involved in the Patient's care; and,
- the health professional and Health Organization may retain records of data entered or accessed in Careteam as part of their medico-legal record of care, storing those records either within Careteam Services or outside the Services.

Personal Information entered by an health professional at a Health Organization Customer may be:

- accessed by staff of that Health Organization Customer, and its authorized health care providers such as credentialed physicians, that are authorized as Careteam users by that Health Organization Customer;
- disclosed to other health professionals who are invited to the Patient's care team by either the Patient or an authorized health professional at the Health Organization Customer;
- disclosed to Patients and their authorized Support Team Member (including Support Team Members selected by the Patient, and those with duly authorized Power of Attorney); and,
- disclosed to third parties authorized by the Patient or involved in the provision of the Services.

When information is provided or made accessible by a health professional or Health Organization to a Patient or their Support Team Members through Careteam, the Patient becomes a custodian of that information and acquires irrevocable access to that information.

Personal Information directly associated with a specific Care Plan that is entered by the Patient, their Support Team Members, health professionals, or third parties (including but not limited to additional careplan details and task/appointment status updates or edits) will be accessible to health professionals at the Health Organization Customer that created that Care Plan.

To the extent made possible by the Services, the Patient may further choose to grant access by any other User of Careteam to additional Personal Information entered by them or their Support Team Members, health professionals or third parties.

The Patient may designate one or more Support Team Members to be their Support Team Contact(s) in Careteam. The Support Team Contact has the same authority as the Patient to administer the Patient's Careteam Account including the ability to message with the Patient's health professionals, add/change/remove users on the Patient's care team, add/change/remove other information, and disclose such information to other users on the Patient's care team.

Patients also acknowledge that by granting access to their Careteam Account to a User on Careteam, they are granting access to both current information stored on Careteam and future information which they or any other User or third party may add to the Patient's Careteam Account. With this in mind, Patients may wish to limit who they provide access to, what they provide access to, or be prepared to remove or modify access in the future if information may be added to their account which they do not wish to be accessible to existing members of their care team.

Information stored in communication messages between Users is accessible to any User that is included in that message. If one User's account is disabled or removed, the other User(s) may still have access to those messages.

For Careteam's full privacy policy, please visit: [https://careteam.me/privacy\\_policy?locale=en](https://careteam.me/privacy_policy?locale=en)

### **Important Points about Our Information Practices:**

We take steps to protect your personal health information from loss and unauthorized use or disclosure. We conduct audits and carry out investigations to monitor and manage our privacy compliance. We take steps to ensure that everyone who performs services for us protects your privacy and only uses your personal health information for the purposes you have consented to.

### **Privacy and our website**

(a) Cookies – When an individual visitor accesses the Body Brave website, we may use 'cookies' to collect information, such as the type of internet browser and operating system the visitor uses, the domain name of the website from which the visitor came, date and duration of the visit, number of visits, average time spent on our website, pages viewed and number of cookies accumulated. A cookie is a small text file containing a unique identification number that identifies the visitor's browser but not necessarily the visitor each time our website is visited. Unless a visitor specifically informs us (e.g. by registering for an event or sending us correspondence from the website), we will not know who the individual visitors are. In addition to the identified purposes described in our privacy policy, we may use this website information and share it with other organizations with which we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.

(b) Online communications – In order to provide our website visitors with a service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question, obtaining information, reviewing or downloading a publication or participating in a seminar or other event. If you are known to Body Brave as a registered user of an online service, we may combine and store personal information about your use of our website and the online information you have provided with certain other online and offline information we may have collected.

(c) Email communications – Occasionally, we may send marketing or promotional email communications to you with information that may be useful, including information about Body Brave and other third parties with whom we have a relationship. We will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional emails from Body Brave.

(d) Links – Our website may contain links to other websites which are provided as a convenience only. Visitors are advised that other third party websites may have different privacy policies and practices than Body Brave, and Body Brave has no responsibility for such third party websites.

(e) Online store- Please read the privacy statement specific to our online store:

## **ONLINE STORE/WORDPRESS PRIVACY STATEMENT**

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### **What do we do with your information?**

When you purchase something from our store, as part of the buying and selling process, we collect the personal information you give us such as your name, address and email address.

When you browse our store, we also automatically receive your computer's internet protocol (IP) address in order to provide us with information that helps us learn about your browser and operating system.

Email marketing: With your permission, we may send you emails about our store, new products and other updates.

### **How do I withdraw my consent?**

If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at anytime, by contacting us at [sonia@bodybrave.ca](mailto:sonia@bodybrave.ca) or mailing us at: 688 Queensdale Ave East, Third Floor, Hamilton, ON L8V 1M1, Canada.

### **Website Privacy Policy:**

#### **Website Visitors**

Like most website operators, Wordpress.com collects non-personally identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Body Brave's purpose in collecting non-personally identifying information is to better understand how Body Brave's visitors use its website. From time to time, Body Brave may release non-personally identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

### **Gathering of Personally Identifying Information**

Certain visitors to Body Brave's websites choose to interact with Body Brave in ways that require Body Brave to gather personally identifying information. The amount and type of information that Body Brave gathers depends on the nature of the interaction. Those who wish to receive Body Brave updates via email, we collect their emails. In each case, Body Brave collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Body Brave. Body Brave does not disclose personally identifying information and visitors can always refuse to supply personally identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.

### **Aggregated Statistics**

Body Brave may collect statistics about the behavior of visitors to its websites. Body Brave may display this information publicly or provide it to others. However, Body Brave does not disclose personally identifying information other than as described below.

### **Protection of Certain Personally Identifying Information**

Body Brave discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on Body Brave's behalf or to provide services available at Body Brave's website, and (ii) that have agreed not to disclose it to others. By using Body Brave's websites, you consent to the transfer of such information to them. Body Brave will not rent or sell potentially personally identifying and personally identifying information to anyone. Other than to its employees, contractors and affiliated

organizations, as described above, Body Brave discloses potentially personally-identifying and personally-identifying information only in response to a subpoena, court order or other governmental request, or when Body Brave believes in good faith that disclosure is reasonably necessary to protect the property or rights of Body Brave, third parties or the public at large. Body Brave takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally identifying and personally-identifying information.

### **Cookies**

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Body Brave uses cookies to help Body Brave identify and track visitors, their usage of Body Brave website, and their website access preferences. Body Brave visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Body Brave's website, with the drawback that certain features of Body Brave's websites may not function properly without the aid of cookies.

### **Third Party Services**

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

However, certain third-party service providers, such as payment gateways and other payment transaction (Pay Pal, Stripe and Canada Helps) processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions as listed below:

- **Pay Pal:** <https://www.paypalobjects.com/webstatic/ua/pdf/EU/privacy.pdf>
- **Stripe:** <https://stripe.com/en-se/privacy>
- **Canada Helps:** <https://www.canadahelps.org/en/privacy-policy/>

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. So, if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act. Once you leave our store's website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

### **Security**

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. If you provide us with your credit card information, the information is encrypted using secure socket layer technology (SSL) and stored with a AES-256 encryption. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards.

### **Age of Consent**

By using this site, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this site.

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### **Challenging Compliance with Body Brave's Privacy Policies & Practices**

An individual will be able to address a challenge concerning compliance with this policy. Body Brave has procedures in place to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal health information. Body Brave will inform individuals who make inquiries or lodge complaints of the existence of relevant complaint procedures. Body Brave will investigate all complaints. If a complaint is found to be justified, Body Brave will take appropriate measures, including, if necessary, amending its policies and practices.

### **Changes to our privacy policy**

Body Brave reserves the right to modify or supplement this privacy policy at any time. If we make a change to this privacy policy, we will post such changes on our website and make such revised policy and changes available upon request to Body Brave as above. However, Body Brave will obtain the necessary consents required under applicable privacy laws if it seeks to collect, use or disclose your personal information for purposes other than those for which your consent is obtained unless otherwise required or permitted by law.

### **Complaints can be directed to:**

(289) 700-5821

Or by e-mail to [info@bodybrave.ca](mailto:info@bodybrave.ca)

Individuals may also make a complaint to the [Ontario Information and Privacy Commissioner](#).

### **For more information, please contact:**

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