

## Privacy Policy

At Writi our mission is to create cutting edge technology products by connecting LTC Pharmacy and Care Homes through successful implementation of Artificial intelligence, Machine Learning, IOT (Digital Pen and Pad) and Blockchain. We are passionate about high-quality and convenient healthcare. We are also passionate about privacy. Privacy is highly important to us. This Privacy Policy (this “Policy”) sets out the key elements of how we address the privacy and security of information entrusted to us by our customers through their access and use of the Writi platform (the “Services”) or visit or use the App or any of our websites that link to this policy (collectively, our “App”) as well as the privacy of information entrusted to us by business partners, prospects and others who seek information and/or contact us through [www.writi.ca](http://www.writi.ca) (individually, collectively, and including any subdomains, the “Site”). The Site can be used and accessed by the public as a source of general information about Writi. Our customers and business partners also can access the Services via the Site.

We want to help you understand how we work with your personal data, so that you can make informed choices and be in control of your information. We invite you to spend a few moments understanding this policy. We may update this policy from time to time and we will notify you when we do so.

**As privacy laws and practices evolve, we will amend this Policy from time to time. While we will endeavor to give reasonable notice of such changes, we do reserve the right, where necessary, to do so without prior notice.**

This policy covers:

- Who we are;
- What personal data we hold and how we get it;
- What we use your personal data for;
- Sharing your personal data;
- Retention;
- Data security and transfers; and
- Your rights.

If you have any questions about how we process your information, please don't hesitate to get in touch by contacting our Data Protection Officer at [DigitalPO@Writi.ca](mailto:DigitalPO@Writi.ca)

### **Who we are**

Writi is a cloud-based Software-as-a-Service (SaaS) platform designed to help long-term care home and pharmacies of residents and patients in their care and to connect Writi customers with a variety of related healthcare networks and service providers. We primarily collect Personal Information as necessary to communicate with you and/or to provide the Services. Some Personal Information (but not PHI) also may be collected for marketing and sales purposes (*e.g.*, if you complete a form to register for

a webinar or download content, or if you visit a part of our Site where we deploy cookies from LinkedIn, Facebook, Twitter, etc. [in which case, their privacy policies will apply]).

Your relationship is with Writi Inc. When this policy talks about 'Writi', 'us', 'we' or 'our', it means Writi Inc.

What personal data we hold and how we get it

We use the following categories of personal data:

## **Personal Information**

When you register with us, you complete forms and provide us with basic information about yourself, such as your name, date of birth, physical address and email address.

Personal Information and non-personal information may be used for the following reasons:

- to register customer accounts
- to contact customers to discuss their experience with the Services, current and future needs as a customer, or to communicate future promotions or special events which might benefit them
- to contact a prospective customer
- to provide our cloud-hosted SaaS Services
- to operate, maintain, manage and administer the Services, including processing registrations and payments, and diagnosing technical problems
- to respond to questions and communications
- to make service or administrative announcements to customers about unscheduled downtime or new features, services, products, functionality, terms, or other aspects of the Services
- to perform audits, research, measurements and analyses in an effort to maintain, administer, support, enhance and protect the Services, including determining usage trends and patterns and measuring the effectiveness of content, advertising, features or services
- to create new features, products or services
- to contribute to certain health and medical research (only non-personal information will be used)\*
- to provide benchmarking and performance tracking solutions\*

*\*We may track and analyze non-identifying, aggregate usage, and volume statistical information from our visitors and customers and may provide such information to third parties. We are committed to ensuring privacy and protecting Personal Information. We also are committed to providing valuable insights and analytics to enable better performance and quality.*

We use cookies to enhance the quality of the Services by, for example:

- saving user preferences
- preserving session settings and activities
- providing limited auto-fill functionality for those who use the Services frequently
- analyzing various features and content of the Services

## **Health and medical information**

The main type of information we hold about you or your patients or senior residents is health and medical information: information about your health, symptoms, treatments, test results, consultations

and sessions, medications and procedures. This includes details of your consultations with doctors, pharmacists, and interactions with our digital services.

We get this information directly from long term care home or their contracted pharmacy, when you register with us and when you use our healthcare services. Any correspondence we receive from you is uploaded electronically to your Writi System. We may also get this information from third parties, such as laboratories or other healthcare professionals.

We retain recordings of speech to text, in order to provide you with an easy way to re-watch your voice-based commands where you wish to, and so that we can ensure high quality care is provided to your patients or residents. With your consent, we may also use the recordings to allow us to learn from them to improve our services. These recordings are held securely in accordance with our retention policy. You can access voice-based commands recordings at any time through the App. You can always request that voice-based commands are not be recorded, or that recordings be deleted.

We may also hold information about you and your health from other apps, devices and services where you have given your consent to that data being shared with us. Examples include where you decide to share information collected from a smart watch or similar device with our App.

### **Financial information**

If you make any payments on the App, your credit/debit card details are processed directly by a third-party processor that will store all payment information and transaction details. We will only retain details of transactions on secure servers and we will not retain your credit or debit card information.

### **Technical information and analytics**

When you use our App or Services, we may automatically collect the following information where this is permitted by your device settings:

- a. technical information, including the address used to connect your mobile phone or other device to the Internet, your login information, system and operating system type and version, browser or app version, time zone setting, operating system and platform, and your location (based on IP address); and
- b. information about your visit, including products and services you viewed or used, App response times, interaction information (such as button presses) and any phone number used to call our customer service number.
- c. Date and time a 'request' is transmitted through the Site
- d. The model of the device making the request
- e. The type and version of the operating software running on the device
- f. The web browser used on the device and making the request
- g. IP address
- h. Geographic location

- i. Time zone
- j. Search terms used
- k. URLs visited
- l. Information about some of the cookies that are installed on your computer, mobile device or tablet
- m. Internet service provider
- n. Previous activity on the Site

Additionally, we use Google Analytics to track and analyze page usage behavior to improve performance in the use of the Services and the Site. We use this to track only what page you are clicking on, and do not use it to track any Personal Information. You can read more about how Google uses your Personal Information [here](#). You can also opt-out of Google Analytics [here](#).

Moreover, We work with service providers who provide us with analytics and advertising services (for our services only and not for third party advertising). This includes helping us understand how users interact with our services, providing our advertisements on the internet, and measuring performance of our services and our adverts. Cookies and similar technologies may be used to collect this information, such as your interactions with our services. You can change your device settings to block cookies, or to notify you before a cookie is set. If you block cookies, you may not be able to use all the features of our App.

#### **What we use your personal data for**

If you are a Writi customer, Writi collects certain personal information from or about you. We collect personal information only for the following purposes. We generally use personal data with your consent, except where the use of personal data without consent is permitted by law.

To establish and maintain a responsible commercial relationship with you and to provide ongoing service. Here are some examples of what we mean by this:

- When you apply for a service, we may set up an account and collect personal information such as name, address, date of birth, preferred language, Writi account number(s), any other authorized users, unique account security PIN(s) and email address.
- In order to confirm your identity and/ or conduct a credit check, we may ask for acceptable identification or identifying information.
- We collect and use some personal information to confirm your identity when you contact us. For example, when you contact us, we will ask to confirm some personal information to verify it's actually you and not someone trying to access your account without authorization.
- For billing purposes, we collect records of the services you use; we also collect payment information to set up pre-authorized payments, if you choose to do so.

- We may require certain technical information from you, such as your wireless device information, telephone number, email, and operating system in order to set up some of our services or to assist you in troubleshooting service issues.
- We maintain a record of the products and services you receive from us, and we may collect additional information about the usage and patterns associated with those products and services so that we can better meet your needs and preferences.
- We may collect or infer information about you or your preferences for particular products, services or lifestyle activities from information you provide us about yourself when you tell us your preferences, or when your usage activities indicate what your preferences are.
- From time to time, we review and analyze personal information and your use of our products and services:
  - To help us provide tailored content and services, such as personalized product recommendations and special offers from Writi and others that we think will interest you
  - To recommend a new feature of the applications you use
  - To better understand your preferences, and to help us develop or enhance our products and services
  - To recommend a new service or Writi app that we think you'll enjoy based on your existing services with us or the apps you use
- We may note that you have certain Writi products or modules and services and offer you a discount if you bundle services
- We may collect personal information to help us manage our day-to-day operations efficiently, and to plan, manage and secure our systems
- We analyze how many customers use our systems and customer usage patterns to help us make our systems more efficient. We may use video surveillance to monitor and/ or record the activity that occurs around Writi stores, premises or infrastructure
- We monitor activity on our networks to detect and prevent fraud to protect both our customers and our business
- We record interactions, such as chats with or telephone calls to or from Writi representatives for quality assurance and training purposes; our systems may also conduct real-time analytics on such interactions to identify trends and patterns to help us serve you better
- We collect information about visits to our websites [www.writi.ca](http://www.writi.ca) to optimize our web properties, and for security purposes.
- We may collect or preserve personal information in response to a court order
- We need to collect certain personal information to comply with statutory obligations, including our tax reporting obligations.

- We obtain and use your patients or senior's medical information because this is necessary for medical purposes, including medical diagnosis and the provision of healthcare or treatment. This includes the information collected through your interaction with Writi App (such as notes and recordings) and your use of our digital services. It may also include sharing information with other healthcare professionals as necessary for the provision of care to you, such as your GP, specialist referral services, therapists, pharmacists, hospitals, accident and emergency services, pathology service providers, and diagnosis centres chosen by you for the purpose of imaging request forms.
- Where you have provided your explicit consent, we will use your, patients and seniors medical information (always having removed personal identifiers, such as your name, address and contact details) to improve our healthcare products and services, and our artificial intelligence system, so that we can deliver better healthcare to you and other Writi users. This medical information (de-identified in the way described above) may include your medical record (both records received and created by us), transcripts and recordings of your interactions, and your interactions with our artificial intelligence services. This does not involve making any decisions about you - it is only about improving our products, services and software so that we can deliver a better experience to you and other Writi users and help achieve our aim of making healthcare affordable and accessible to everyone. Strict confidentiality and data security provisions apply at all times.
- We may obtain and use data about your precise location where you give your consent (through providing us access to your location), for example, to help direct you to the nearest pharmacy. We may also derive your approximate location from your IP address.
- Based on our legitimate interest in managing and planning our business, we may analyse data about your use of our products and services to, for example, troubleshoot bugs within the App, forecast demand of service and to understand other trends in use, including which features users use the most and find most helpful, and what features users require from us. This does not involve making any decisions about you - it is only about improving our App so that we can deliver better services to you. Strict confidentiality and data security provisions will apply at all times.
- Where necessary, we may need to use personal and financial details for the purposes of fraud prevention and detection.
- Where necessary for safety, regulatory and/or compliance purposes, we may audit consultations and your other interactions with our services. Strict confidentiality and data security provisions will apply at all times to any such audit and access.

## **Sharing your personal data with others**

We take great care with what information we share, and why. There are circumstances where we share some personal information about our customers:

- We will need to share your Personal Information with a third party as a result of a business reorganization. The first situation concerns the acquisition of Writi by a third party, and the second concerns the acquisition of our customers. A reorganization involves a sale, merger,

transfer, exchange or other disposition of all or part of a business. If such a transaction occurs, be aware that your Personal Information may be made available to the acquiring party. If the reorganization concerns one of our customers, Writi requires the parties participating in the sale to show written evidence of the completed transaction, or some alternate form of written authorization (by both the buyer and the seller), to transfer Personal Information hosted by the Services from the seller to the buyer. A change in management of a customer facility could involve similar authorization requirements, if data must be transferred from the prior management company to the new management company (or to the owner). We will not disclose your Personal Information to a party without sufficient and proper authorization from you, unless required by law.

- We may share your personal data with members of our corporate group to help us deliver our services to you.
- We share personal data (with identifiers removed) with members of our corporate group to help us develop, improve and maintain our software and artificial intelligence system (where you have explicitly consented to this use of your data).
- We may share your personal data with companies we have hired to provide services on our behalf, such as data hosting and processing, technical support, billing and payment processing, marketing and communications. These service providers are bound by strict confidentiality and data security provisions, and they can only use your data in the ways specified by us.
- Where you access our services through public or private health insurance, and where you have given your consent, we will need to let your insurance company know your name, email address, policy number, location (based on IP address), demographic information, that you had an appointment with us, the date of the appointment, details of your diagnosis, prescription, pharmacy location, whether or not you had a referral made and other similar information about your appointment with us.
- We will, where necessary for your patients or senior's treatment or care, share your information with your other health and social care providers. For example, your GP, specialist referral services, therapists, pharmacists, hospitals, accident and emergency services, pathology service providers, diagnosis centers chosen by you for the purpose of imaging requests, and other health and care bodies. This may include sharing information with such services for safeguarding purposes in accordance with our legal or professional obligations.
- We may preserve or disclose information about your patients to comply with a law, regulation, legal process, or governmental request; to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of our services or the physical safety of any person.

Except as described above, we will never share your personal information with any other party without your consent.

## **Retention**

We retain your personal data and medical records for as long as necessary to provide the services you have requested and otherwise in accordance with legal, regulatory and self-regulatory requirements.

## **Data storage, security and transfers**

We do not store your personal health data on your mobile device. We store all your personal health data - including your primary care information, medication information and diagnostic information - on secure servers.

Where you have chosen a password that enables you to access certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

We do not store any credit or debit card information. Payments are processed via a third-party payment provider that is fully compliant with Level 1 Payment Card Industry (PCI) data security standards. Any payment transactions are encrypted using SSL technology.

We encrypt data transmitted to and from the App. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Your data may be processed, stored or accessed by Writi or our service providers from inside or outside of Canada, including in the European Union. In either case, personal data will be protected in accordance with data protection law and subject to strict safeguards. For example, when we do transfer personal data outside of Canada, we strive to minimize the amount of personal data that we transfer. Notwithstanding these safeguards, while outside of Canada, personal data may be accessible by foreign government agencies under applicable law.

## **Your rights**

You have the right to withdraw your consent at any time by accessing the privacy settings in the App.

You may also have the right to

- Request access to the personal data we hold about you or your patients and seniors. Recordings of your interactions with us and other medical notes can be accessed via the App. For other information, you can make a request by email;
- Ask us to rectify or erase information we hold about you, subject to limitations relating to our obligation to store medical records for prescribed periods of time;
- Ask us to restrict our processing of your personal data or object to our processing; and
- Ask for your data to be provided on a portable basis.

## **Contact us**

For any questions or concerns, you can contact us by sending an email to [DigitalPO@Writi.ca](mailto:DigitalPO@Writi.ca)