

Privacy Policy

Effective Date: March 23, 2022

Please read this privacy policy (“Privacy Policy” or “Policy”) carefully and visit us here periodically as it may be updated and is effective once we post it. We invite your comments and questions.

Baycrest Hospital (referred to in this Policy as “Baycrest”, “us”, “we”, or “our”) provides an online hearing screening test (“Services”) powered by a company called Shoebox Ltd, available at this link: <https://www.shoeboxonline.com/baycrest/?> .

This Privacy Policy describes how we collect, use, disclose and safeguard your personal information (“Personal Information”) in connection with the use of the Services. Please review this Privacy Policy along with our [Terms of Use](#). Each and every time you access our Services, you consent to all of our Terms of Use and this Privacy Policy.

WHAT IS PERSONAL INFORMATION?

Personal Information is information about an identifiable individual, either alone or when combined with other information, and may include personal health information.

COLLECTION OF PERSONAL INFORMATION

You do not need to create a user account in order to use the Services. After completing the Services or at any time, you can provide us with your name and contact information in order to further discuss your hearing with one of our staff members or audiologists.

When you follow our link, you can also read the Shoebox Ltd. Privacy Policy before proceeding to the Services.

You are under no obligation to provide Personal Information to use the Services, with the caveat that your refusal to do so may prevent you from using certain portions of the Services. Baycrest does not collect, use or disclose Personal Information without your consent, except as permitted or required by law or as set out below.

Third Party Service Providers: We may use third party service providers to help perform administrative functions such as management of the Services, analytics or for assisting us in understanding how our Services are used.

USE AND DISCLOSURE OF PERSONAL INFORMATION

Baycrest will not use or disclose Personal Information for purposes other than the identified purposes of the Services. We will not rent, exchange or sell your Personal Information.

General use: We may use your Personal Information for various purposes, primarily to provide you with an online hearing screening test and to enable you to use our Services. In addition, when you provide us with your name and email address such that we may engage further with you, we may use Personal Information to:

- contact you in relation to the Services or with notices about our Services
- provide and maintain our Services;
- notify you about changes to our Services;
- allow you to participate in any interactive features of our Services when you choose to do so;
- provide customer service and support, administrative messages, resolve disputes, and troubleshoot problems;
- gather information for purposes of analysis so that we can improve our Services;
- monitor the usage of our Services;
- detect, prevent and address technical and security issues;
- fulfill any other purpose for which we provide you notice through this Privacy Policy;
- carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- provide you with notices about your account;
- enforce our Terms of Use or other contractual agreements with you; and
- comply with legal or regulatory requirements;
- comply with other lawful purposes under applicable privacy laws.

If you provide your name and contact information and would like to opt out of future electronic communications from Baycrest, you may indicate this preference by selecting the unsubscribe instructions at the end of our electronic communications.

Third parties: We may share your Personal Information with third party service providers who help us to run our operations or to otherwise fulfill your request or as required by law. Our service providers are restricted from using your Personal Information in any way other than for the service they are providing. We make reasonable efforts to ensure that such third parties maintain reasonable and appropriate safeguards and we utilize our reasonable efforts to ensure they sign confidentiality agreements or have similar confidentiality requirements

included in their standard agreement.

Feedback: From time to time, Baycrest may also ask for your feedback designed to help us improve the Services. Any Personal Information provided to Baycrest in connection with any your feedback will be used for that purpose and as otherwise described in this Policy.

Disclosure: Notwithstanding the foregoing, Baycrest is permitted by law to disclose your Personal Information when Baycrest determines, at its sole discretion, that the disclosure of such information is necessary or appropriate:

- to enforce our rights against you or in connection with a breach by you of this Privacy Policy or the Terms of Use;
- to investigate or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of us, our users, or others;
- to prevent prohibited or illegal activities; or
- when permitted or required by any applicable law, rule, regulation, subpoena, or other legal process.

DE-IDENTIFIED OR AGGREGATED DATA

Baycrest may collect, compile, use and share de-identified and aggregated data such as descriptive and inferential statistics, hearing screening test data, and the websites and pages you visit within our Services, including for quality improvement purposes as well as future research studies (only with research ethics board approval) and other analytical purposes and/or to improve the user experience of the Services.

Aggregated data may be derived from your Personal Information but is not considered Personal Information in law as it does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Policy.

DATA RETENTION

We will retain your Personal Information as required under any applicable laws. We may retain de-identified or anonymized information for as long we deem necessary and in accordance with the terms of this Policy.

SECURITY SAFEGUARDS

We take your privacy very seriously and we are committed to safeguarding any Personal Information we collect in the course of providing the Services to you.

We take appropriate technical, physical and administrative security measures to protect Personal Information against unauthorized access, use, modification and disclosure, theft, and accidental loss, destruction and damage, including but not limited to:

- providing reasonable physical and electronic safeguards with regard to the storage of Personal Information;
- limiting access to your Personal Information to those employees or contractors who we reasonably believe require your Personal Information to provide Services to you or in order to do their jobs; and
- governing employees and other contractors by strict standards and policies to ensure that Personal Information is secure and treated with the utmost care and respect.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development using contact information you have provided to us.

We will never send email messages to you requesting confidential information such as passwords, credit card numbers, or social insurance numbers. Do not act on any such emails, as you may compromise your Personal Information by replying or by following links to a fraudulent website.

Please note that no data transmission over the internet or otherwise can be guaranteed to be completely secure. As a result, while we strive to protect your Personal Information, we cannot warrant the security of any information you transmit to us, and you do so at your own risk.

If you have a security related concern, please contact us at: privacy@baycrest.org. We will work closely with you to ensure a prompt response to your concerns.

FOR ASSISTANCE

Baycrest is located in Toronto, Ontario. You can contact us with any questions or comments about this Privacy Policy at privacy@baycrest.org; or by phone at (416) 785-8500 ext. 6300.

If your inquiry has not been addressed to your satisfaction, you may contact the Information and Privacy Commissioner of Ontario:

Information and Privacy Commissioner of Ontario

2 Bloor Street East, Suite 1400 Toronto, ON M4W 1A8

Toronto Area: 416-326-3333

Long distance: 1-800-387-0073

General email (note that email is not secure and you may wish to limit the Personal Information you provide): info@ipc.on.ca