

PRIVACY POLICY

Baycrest Centre for Geriatric Care (“**Baycrest**”, “**we**”, “**us**”, “**our**”) is a registered charity located at 3560 Bathurst Street, North York, Ontario, M6A 2E1. Baycrest operates the Memory Link Calendar mobile app (the “**App**”). Baycrest is a health information custodian under the *Personal Health Information Protection Act, 2004*, (“**PHIPA**”, or the “**Act**”). Baycrest complies with PHIPA and protects “**personal health information**” as defined under the Act.

The terms “**you**” and “**your**” in this privacy policy refer to the patients of Baycrest who use App, along with other non-patient users.

Accountability for Personal Health Information

Baycrest collects limited personal health information for purposes of the App and is accountable to hold it securely. Baycrest is also responsible for personal health information in its custody and control, including as collected, used, or disclosed by its agents, i.e., on Baycrest’s behalf. Agents use your information on a “need to know” basis according to their role at Baycrest, including in relation to the App.

Identifying Purposes for Collection

Generally, Baycrest collects personal health information for purposes related to direct care, administration and management of the Memory Link program, and related research, meeting legal obligations and as permitted or required by law.

Baycrest collects the following through the App:

CATEGORY	DESCRIPTION	PURPOSE OF COLLECTION	SOURCE OF COLLECTION
User Profile	<ul style="list-style-type: none">• First and last name• Participant ID (assigned by Baycrest)• First session date• Email address	Create your account Verify your identity Grant access to the App	You
Technical Data (Locked stage only)	<ul style="list-style-type: none">• Time to complete trial• Time to complete each step• Cue level given• Number of errors• Number of trials completed• Number of steps completed or skipped	Monitor and assess your progress; tailor future training	You Third party service providers

We will update this chart if we add any new purposes and let you know, so you can determine if you wish to keep using the App.

Consent

We will seek a specific consent to use the information we have collected from you for purposes of research.

Limiting Collection Use and Disclosure

We collect only the personal health information in the App that we need to provide the functions of the App. We further limit use and disclosure of personal health information the purposes other than those for which it was collected, except with the consent of the individual or as permitted or required by law.

Retention, Storage, and Disposal

You may request deletion of information we hold about you (name/participant ID, email address, and training data) at any time (including when you remove your profile) by contacting Baycrest's Privacy Officer, but this will not apply retroactively and may limit your ability to use the App.

Accuracy

We take reasonable steps to ensure that information we hold about you in the App is as accurate, complete, and up to date as is necessary.

Safeguards

Baycrest has put in place safeguards for the personal health information it holds, including security features for this App. Baycrest generally applies the following protections for all of its records of personal health information:

- Physical safeguards (such as locked filing cabinets and rooms);
- Administrative safeguards (such as training our Agents on privacy, and creating these privacy policies such as this one)
- Technological safeguards (such as the use of passwords, encryption, and audits).

We take steps to ensure that the personal health information we hold is protected against theft, loss and unauthorized use or disclosure.

Openness

We make available the following information about Baycrest's policies and practices relating to the management of personal health information, including:

- Contact information for our Privacy Officer, set out below, including how to make complaint to Baycrest or to the Information and Privacy Commissioner of Ontario (the "IPC").
- The process for obtaining access to or correction of personal health information we hold;
- Our notice of information practices.

Individual Access to and Correction

Access to the personal health information we hold about you through the App is available by contacting the Baycrest's Privacy Officer.

Challenging Compliance

Any person may ask questions or challenge our compliance with this privacy policy by contacting Baycrest's Privacy Officer at (416) 785-2500 ext. 6300 or privacy@baycrest.org (please do not send personal health information via email). The Privacy Officer:

- Receives and responds to complaints or inquiries about Baycrest's policies and practices relating to the handling of personal health information.
- Informs individuals who make inquiries or lodge complaints of other available complaint procedures.
- Investigates all complaints. If a complaint is found to be justifiable, Baycrest will take appropriate measures to respond.

The Information and Privacy Commissioner of Ontario (IPC) oversees Baycrest's compliance with privacy rules and PHIPA. You make an inquiry or complaint directly to the IPC by writing to or calling:

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, Ontario M4W 1A8 Canada
Phone: 1 (800) 387-0073 (or 416-326-3333 in Toronto)
Fax: 416-325-9195
www.ipc.on.ca