

Privacy Policy

Individuals who are registered with Soft Bones Canada™ (herein "SBC") are entitled to expect that their information will be held in confidence. Personal information about specific individuals is not shared to an outside party, without consent.

Privacy Principles

SBC is committed to maintaining the accuracy, confidentiality, and security of your personally identifiable information (herein "Personal Information"). As part of this commitment, the following ten Privacy Principles govern our actions as they relate to the collection, use and disclosure of Personal Information. The principles have been built upon the values set by the Canadian Standards Association's Model Code for the Protection of Personal Information and Canada's Personal Information Protection and Electronic Documents Act.

- Principle 1 - Accountability
- Principle 2 - Identifying Purposes
- Principle 3 - Consent
- Principle 4 - Limiting Collection
- Principle 5 - Limiting Use, Disclosure and Retention
- Principle 6 - Accuracy
- Principle 7 - Safeguarding Supporter Information
- Principle 8 - Openness
- Principle 9 - Supporter Access
- Principle 10 - Handling Supporter Complaints and Suggestions

Principle 1 - Accountability

SBC is responsible for maintaining and protecting the Personal Information under its control. SBC has designated an individual or individuals who is/are accountable for compliance with the ten Privacy Principles.

Principle 2 - Identifying Purposes

The purposes for which Personal Information is collected will be identified before or at the time the information is collected.

Principle 3 - Consent

Knowledge and consent are required for the collection, use or disclosure of Personal Information except where required or permitted by law.

Principle 4 - Limiting Collection

The Personal Information collected will be limited to those details necessary for the purposes identified by SBC.

Principle 5 - Limiting Use, Disclosure and Retention

Personal Information may only be used or disclosed for the purpose for which it was collected unless you have otherwise consented, or when it is required or permitted by law. Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected or as required by law.

Principle 6 - Accuracy

Personal Information will be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

Principle 7 - Safeguarding Supporter Information

Personal Information will be protected by security safeguards that are appropriate to the sensitivity level of the information.

Principle 8 - Openness

SBC will make information available to our supporters concerning the policies and practices that apply to the management of their Personal Information.

Principle 9 - Supporter Access

Upon request, a supporter shall be informed of the existence, use and disclosure of their Personal Information, and shall be given access to it. Supporters may verify the accuracy and completeness of their Personal Information, and may request that it be amended, if appropriate.

Principle 10 - Handling Supporter Complaints and Suggestions

Supporters may direct any questions or enquiries with respect to the privacy principles outlined above or about our practices by contacting: SBC's Privacy Officer, our Office Manager at contactus@softbonescanada.ca.

Before SBC is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavour to respond within an appropriate time frame. If you have questions or concerns regarding our organization's privacy policy and practices, you should first contact SBC directly. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact the Privacy Commissioner's Office at www.privcom.gc.ca (or 112 Kent Street, Ottawa, Ontario, K1A 1H3), who will then serve as a liaison with SBC to resolve your concerns.

What Information is Collected?

At SBC, we collect, use and disclose Personal Information to provide you with the services you have requested and to offer you additional services we believe you might be interested in. Providing us with your Personal Information is always your choice. The types of Personal Information we may ask for depends on the nature of the services we provide you and typically includes your name, address, telephone number and e-mail address. Depending on the project, it may include patient stories and pictures. When you visit the SBC website, Personal Information is not collected unless you choose to

provide it voluntarily. You are welcome to browse the website at any time anonymously and privately without revealing any personal information about yourself.

Types of Information We Collect

Personal Information

Most of the Personal Information we collect comes to us directly from you, and only with your consent. With your consent, we may collect Personal Information from you in person, over the telephone or by corresponding with you via mail, facsimile, or the Internet. As noted, the choice to provide us with Personal Information is always yours. However, your decision to withhold particular details may limit our ability to provide you with any of our services.

If we are unable to accommodate your request based on the information that has been provided to us, we may ask for additional details in order to identify other ways to be of assistance. SBC also maintains a file containing contact history that is used for supporter inquiry purposes.

Anonymous/Non-Personal Information

At SBC, we also collect anonymous/non-personal information. Anonymous/non-personal information is information that we do not associate with or trace back to a specific individual or business entity. For example, our web servers collect some anonymous/non-personal information automatically when you visit our website. Gathered electronically, this information may include the pages you visited, the type of web browser you are using, the level of encryption your browser supports and your Internet Protocol address. The anonymous/non-personal information collected may be used for research and analytical purposes. To help us better understand our markets, we may also gather information for analytical purposes by conducting supporter surveys, and by extracting demographic information from existing files.

Consent

Your provision of Personal Information to us means that: (a) you agree and consent that we may collect, use and disclose your Personal Information in accordance with this policy; and (b) you or your representatives are authorized to provide us with your Personal Information. If you do not agree with these terms, you and your representatives are requested not to provide any Personal Information to SBC. Certain services can only be offered if you provide Personal Information to SBC. Consequently, if you and your representatives choose not to provide us with any required Personal Information, we may not be able to offer you certain services.

How Your Information is Used

Personal Information

We use your Personal Information to communicate with you, effectively provide the services you have requested and safeguard your interests. We may also send you information about other services in which we believe you may be interested. We may use your Personal Information in the context of a personal story, photographs, and/or digital media that you have consented to submit to SBC. The manner in which those personal stories are utilized will be included in the consent you are asked to provide, but may include such things as newsletters, blogs, and patient support/education tools. We

only use Personal Information for the purposes that we have disclosed to you. If for any reason your information is required to fulfill a different purpose, we will obtain your consent before we proceed.

Anonymous/Non-personal information

The anonymous/non-personal information gathered from the SBC website is used primarily for technical, research, and analytical purposes like evaluating the various sections of the website. This information does not include any personal information and it is only retained until its intended purpose is fulfilled. An example would be information gathered for the purposes of populating a patient evidence submission. It is our goal to continuously improve our service offerings to you. Therefore, we use anonymous/non-personal information collected from surveys, from public archives and by extracting information from existing files to better understand our supporters' interests, priorities, and satisfaction levels.

When Information May be Disclosed to Outside Parties

We are obliged to keep your Personal Information confidential except when authorized by you, when required by law and when permitted by law. At SBC, we sometimes contract outside organizations to perform specialized services such as terminal delivery and repair, and shipping and fulfillment services. Our trusted service suppliers may at times be responsible for processing and handling some of the information we receive from you. When we contract our suppliers to provide specialized services, they are given only the information necessary to perform those services.

When Required by Law

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

When Permitted by Law

There are some situations where we are legally permitted to disclose personal information such as employing reasonable and legal methods to enforce our rights under our agreements, to collect a delinquent account or investigate suspicion of illegal activities.

With Whom We May Share Your Information

Individuals Within our Organization and Contractors

In the course of daily operations, access to private information is restricted to individuals within our organization who have a legitimate purpose and reason for accessing it. Unauthorized access to and/or disclosure of supporter information by an individual within SBC are strictly prohibited. All individuals within our organization and independent contractors are expected to maintain the confidentiality of supporter information at all times.

How You Can Protect Your Information

We believe in protecting your Personal Information. We believe there are measures you should take as well. The following is a list of things you can do to protect yourself against fraud and uninvited intrusion.

Personal Information

You should not share personal information with others unless you clearly understand the purpose of their request and you know who you are dealing with.

Your Online Security

To make sure your connection to any website is secure, look for either a 'closed lock' or an 'unbroken key' icon located at the bottom right hand side of your browser's task bar. You may also check the Address bar to determine if SSL (Secure Socket Layer) is active by looking at the beginning of the address. If it starts with "https" rather than the standard "http", then SSL is operating.

Accessing and Amending Your Information

At SBC, decisions are made based on the information we have. Therefore, it is important that your Personal Information is accurate and complete. As a supporter, you have the right to access, verify and amend the information held in your personal and financial files.

Accessing Your Information

For privacy-related matters, you may access and verify any of your information by emailing our supporter contact at contactus@softbonescanada.ca.

Amending Your Information

To help us keep your Personal Information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file(s), we will make the proper changes. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us.

To Make a Change

To make a change to the personal contact information contained in your file, you may email the following: contactus@softbonescanada.ca. In each case, you will be required to verify your identity by providing some personally identifying information. Before SBC is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavour to respond within an appropriate timeframe. If you have questions or concerns regarding our organization's privacy policy and practices, you should first contact SBC directly. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact the Privacy Commissioner's Office at www.privcom.gc.ca (or 112 Kent Street, Ottawa, Ontario, K1A 1H3), who will then serve as a liaison with SBC to resolve your concerns.

Updating this Privacy Policy

Any changes to our privacy policy and information handling practices will be acknowledged in this policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the modification date found at the bottom of the document.

Websites Governed by this Privacy Policy

The websites that are governed by the provisions and practices stated in this privacy policy are:
www.softbonescanada.ca.

Other Websites

The foregoing website may contain links to other third party sites that are not governed by this privacy policy. Although we endeavour to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave these websites. Additionally, we are not responsible for the privacy practices employed by other third party websites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.

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