

# Privacy Policy

1	Purpose	<p>3sHealth is committed to protecting and respecting the privacy of personal information under its control. The purpose of this policy is to confirm 3sHealth’s commitment to privacy and to establish policies and procedures as required to comply with applicable privacy laws. The primary objective of this Policy is to help ensure that 3sHealth meets its obligations under applicable privacy laws. It is important to recognize, however, that the privacy laws may change from time to time. Where such changes occur, this Policy will be amended accordingly.</p> <p>This Policy applies to all personal information in the possession and control of 3sHealth and to all directors, officers, management, and employees of 3sHealth, and to all contractors providing services to 3sHealth (collectively, “3sHealth Representatives”).</p>
2	Policy Statement	<p><b>1. Implementation</b> This Policy Framework will be reviewed annually to ensure compliance and to determine whether any changes to this Policy are necessary to deal with new legal requirements and/or new business processes.</p> <p><b>2. Implementation of Privacy Principles</b></p> <p><b>2.1 Accountability</b></p> <p>2.1.1 The Privacy Analyst will assume the position of Privacy Officer for 3sHealth. The Privacy Officer will assume general responsibility for all personal information under the control of 3sHealth and will be generally accountable for 3sHealth’s compliance with applicable privacy laws. However, this does not in any way relieve other 3sHealth Representatives of their respective individual responsibilities under this Policy.</p> <p>2.1.2 If a communication is received from the public inquiring as to who within 3sHealth is responsible for privacy matters, the inquiring person shall be informed that the Privacy Officer is responsible for privacy (see Section 2.9 for further detail).</p> <p>2.1.3 3sHealth’s obligations with respect to personal information extends to personal information that 3sHealth provides, or</p>

		<p>allows access, to 3sHealth Representatives that are third-party contractors. In any situation where personal information under 3sHealth’s control will be disclosed to or accessed by a third-party contractor, an appropriate written confidentiality agreement must be put in place with the third-party contractor.</p> <p><b>2.2 Identifying Purposes</b></p> <p>2.2.1 3sHealth primarily collects, uses, and discloses personal information for the purpose of providing services to health-care organizations and professionals, and managing employee relationships. A list of each of these services is below and is considered an “Authorized Purpose.”</p> <ul style="list-style-type: none"> <li>• Administering benefits, including health and dental benefits, disability income plan benefits and life insurance plans for health-care organizations and professionals.</li> <li>• Providing payroll services including disclosures to Canada Revenue Agency as required by law.</li> <li>• Providing consulting services with a third-party company on behalf of health-care organizations and professionals (i.e. DIP – return to work program.).</li> <li>• Providing health-care support services such as dictation and transcription services to support physicians and other health-care professionals in Saskatchewan.</li> <li>• Providing financial, capital and human resource management services.</li> <li>• Managing employee relations.</li> <li>• Communicating with health-care organizations and professionals in relation to the above services.</li> </ul> <p>2.2.2 3sHealth Representatives shall not collect, use, or disclose personal information for any other purpose without the prior approval of the Privacy Officer. Where a 3sHealth Representative propose to collect, use, or disclose personal information for another purpose (e.g. required or authorized by law), additional details must be provided to the Privacy Officer. In such situations, the Privacy Officer shall determine</p>
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		<p>whether any additional consents are needed from the individual(s) to whom the personal information relates. Only the Privacy Officer will have authority to determine whether a purpose is otherwise “required or authorized by law.”</p> <p>2.2.3 3sHealth Representatives should familiarize themselves with the Authorized Purposes. Further, 3sHealth Representatives should be able to explain to any individual from whom they are collecting (or have collected) personal information the purposes for which that information is being collected and how it will be used or disclosed.</p> <p><b>2.3 Consent</b></p> <p>2.3.1 3sHealth has reviewed the types of personal information it collects to ensure that each type of personal information is reasonably necessary to fulfill specified and legitimate purposes (i.e. the Authorized Purposes).</p> <p>2.3.2 3sHealth will obtain an individual’s consent to collect, use or disclose personal information (except where, as noted below, 3sHealth is authorized to do so without consent).</p> <p>2.3.3 Consent can be provided in writing, electronically, through an authorized representative or it can be implied where: (i) the information is voluntarily provided to 3sHealth for an Authorized Purpose; or (ii) the purpose for collecting, using or disclosing the personal information would be considered obvious and the client, customer, or stakeholder voluntarily provides personal information for that purpose.</p> <p>2.3.4 3sHealth recognizes that, subject to legal, regulatory and contractual requirements, consent to 3sHealth's collection, use and disclosure of personal information may be withdrawn at any time on reasonable notice. Where consent has been withdrawn 3sHealth will update its practices accordingly.</p>
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		<p>this form and told to submit the completed form to the Privacy Officer.</p> <p>2.10.4 Once a complaint has been received by the Privacy Officer, the receipt of the complaint will be acknowledged, and the validity of the complaint will be examined. If the complaint is determined to be valid, the Privacy Officer will ensure that appropriate action is taken. If the case is denied, an explanation will be provided. The Privacy Officer will provide a response in either case.</p>
3	Scope	<p>It is important to note that this Policy is not intended to be a complete statement of all aspects of privacy within 3sHealth. Instead, it is intended to establish a high-level policy that will guide and assist 3sHealth in complying with privacy law requirements in a timely and cost-effective manner. As such, this Policy may, from time to time, be supplemented by additional policies, standards, guidelines and procedures that address specific privacy related risks or issues relating to 3sHealth. Examples of situations where specific policies may be implemented:</p> <ul style="list-style-type: none"> <li>• Where further detail is required to meet the requirements, guidelines and overall objectives of this Policy; and</li> <li>• Where a new program or service offering is introduced at 3sHealth that has unique privacy-related issues or requirements.</li> </ul> <p>Non-compliance with this Policy by any 3sHealth Representative may lead to disciplinary action including suspension, dismissal or termination of contract.</p>
4	Definitions	<p><b>“collect, collection”</b> means the process of gathering or obtaining personal information from a source external to 3sHealth. Sources of collection include:</p> <ul style="list-style-type: none"> <li>• The individual;</li> <li>• Agents;</li> <li>• Personal representatives of the individual (for example, accountants, lawyers, powers of attorney, family members, etc.);</li> <li>• Former employers; and</li> <li>• Other third party references.</li> </ul>

		<p>“<b>consent</b>” means the permission from an individual (or their legally authorized representative) to collect, use, or disclose the individual’s information for a particular purpose.</p> <p>“<b>disclose, disclosure</b>” means any release of personal information held by 3sHealth to outside sources (for example, disclosing personal information to third party service providers or consultants).</p> <p>“<b>personal information</b>” means information about an identifiable individual (for example, an individual’s name, address, home phone number, gender, marital status, personal net worth, S.I.N., criminal record, etc.) “Personal information” does not include information that is about a business entity.</p> <p>“<b>purpose</b>” means the purpose for which personal information is collected, used, or disclosed.</p> <p>“<b>use</b>” means any internal access and/or use of personal information by 3sHealth.</p>
5	References	<p>This policy aligns with the following privacy legislation:</p> <p><a href="#"><u><i>The Health Information Protection Act (HIPA)</i></u></a></p> <p><a href="#"><u><i>The Local Authority Freedom of Information and Protection of Privacy Act (LAFOIP)</i></u></a></p>
6	Appendices	<p><u>Additional Information:</u></p> <ol style="list-style-type: none"> <li>1. <u>Access Request Form</u>: Request for Access to Personal Information, please see Appendix A.</li> <li>2. <u>Complaint Form</u>: Privacy Complaint Form, please see Appendix B.</li> <li>3. <u>Residents of the European Union</u>: In order to comply with the requirements of the European General Data Protection Regulation (GDPR) for European users, this Policy outlines the legal basis on which we process your personal data (also referred to as personal information herein) and provides other information required by the GDPR. Please see Appendix C to this Policy for more information.</li> </ol>

		4. <u>Website Users:</u> Please see Appendix D to the Policy for more information about our privacy practices as it relates to your use of the 3sHealth website.
7	Approval	3sHealth Senior Leadership Team
8	Approval Date	<i>This policy was approved on: March 30, 2021</i>
9	Review Date(s)	<i>This policy was reviewed/revised on: March 30, 2021</i>
10	Enquiries	Any questions or clarification required should be referred to the 3sHealth Privacy Officer.
11	Policy Owner	Privacy Officer