

## PRIVACY POLICY

1	<b>Purpose</b>
	<p>3sHealth is committed to protecting and respecting the privacy of personal information (PI) and personal health information (PHI) 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 PI and PHI 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	<b>Scope</b>
	<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 a contract.</p>
3	<b>Policy Statement</b>
	<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>

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	<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 PI and PHI 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 PI and PHI extend to PI and PHI that 3sHealth provides, or allows access, to 3sHealth Representatives that are third-party contractors. In any situation where PI or PHI 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 PI and PHI for the purpose of providing services to healthcare organizations, and professionals, as well as 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 healthcare 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 healthcare 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 healthcare professionals in Saskatchewan.</li> <li>• Providing financial, capital, and human resource management services.</li> <li>• Providing human resource services to support recruitment purposes.</li> <li>• Managing employee relations.</li> <li>• Communicating with healthcare organizations and professionals in relation to the above services.</li> </ul>
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	<p>2.2.2 3sHealth Representatives shall not collect, use, or disclose PI and PHI for any other purpose without the prior approval of the Privacy Officer. Where a 3sHealth Representative proposes to collect, use, or disclose PI or PHI 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 whether any additional consents are needed from the individual(s) to whom the PI or PHI relates. Only the Privacy Officer will have the 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) PI and PHI 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 PI and PHI it collects to ensure that the 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 PI and PHI (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 PI and PHI would be considered obvious and the client, customer, or stakeholder voluntarily provides PI or PHI 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 PI and PHI may be withdrawn at any time on reasonable notice. Where consent has been revoked/withdrawn 3sHealth will update its practices accordingly.</p> <p>2.3.5 3sHealth reserves the right to refuse to accept resumes or employment applications and to refuse to provide service to any person who refuses to provide consent in</p>
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	<p>relation to an Authorized Purpose where such consent is required to provide the service.</p> <p><b>2.4 Limiting Collection</b></p> <p>2.4.1 3sHealth has identified the following general categories of personal information that it collects in the regular course of its business:</p> <ul style="list-style-type: none"> <li>• Basic Personal Identifiers (such as name, address, telephone number, etc.)</li> <li>• Unique Personal Identifiers (such as social insurance number; employee number, WCB claim number)</li> <li>• Financial/Banking Information (such as account number; the name of the institution; garnishee information, insurance coverage)</li> <li>• Employment Information (such as department, job title, work phone number, work e-mail address, union affiliation, hours of work, hourly wage)</li> <li>• Complaint Information (such as disciplinary action, investigations, or formal disputes)</li> <li>• Family Information (such as marital status, information about spouse, children, maintenance enforcement, trusteeship)</li> <li>• Personal Health Information (PHI) (such as information about sickness, mental health, or disability)</li> <li>• Personal Information (PI) (such as criminal record checks). Employment History Information (such as resumes and cover letters)</li> </ul> <p>2.4.2 3sHealth has reviewed the specific data elements collected under each of these general categories and determined that each is reasonably necessary in connection with their respective Authorized Purposes.</p> <p>2.4.3 3sHealth Representatives shall not collect data outside of these general categories without the prior approval of the Privacy Officer.</p> <p>2.4.4 3sHealth collects PI and PHI directly from the individual to whom it relates where possible. 3sHealth may collect PI or PHI from healthcare organizations, professionals, and third-party sources where doing so is required to meet the Authorized Purposes with the knowledge and consent of the subject individual or where otherwise authorized by law.</p>
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	<p><b>2.5 Limiting Use, Disclosure, and Retention</b></p> <p>2.5.1 As described above, 3sHealth Representatives are only permitted to use PI and PHI for an Authorized Purpose. If PI or PHI is used for any other purpose prior approval is required by the Privacy Officer, and it must be recorded as a note on the applicable individual's file.</p> <p>2.5.2 Disclosures of PI and PHI by 3sHealth Representatives which do not require the prior approval of the Privacy Officer are limited to the following:</p> <ul style="list-style-type: none"> <li>• Disclosures which are made for an Authorized Purpose or other purpose approved by the Privacy Officer;</li> <li>• Disclosures which are made on a need-to-know basis; and</li> <li>• Disclosures which are made in accordance with any specific disclosure policies which have been approved by 3sHealth and are in force.</li> </ul> <p>2.5.3 In some situations, the use or disclosure of PI and PHI for a purpose other than an Authorized Purpose may be authorized or required by law. Such legal requirements will override this Policy. However, only the Privacy Officer is authorized to determine when such legal requirements apply.</p> <p>2.5.4 3sHealth Representatives must be aware that documents and records containing PI and PHI need to be disposed of or destroyed in a secure manner. 3sHealth Representatives shall follow approved practices when disposing or destroying documents or records containing PI and PHI.</p> <p>2.5.5 PI and PHI will be stored and retained only as long as it is reasonably required for the Authorized Purpose for which it was collected or as required by law.</p> <p><b>2.6 Accuracy</b></p> <p>2.6.1 3sHealth Representatives shall use reasonable efforts to update PI and PHI when possible. However, this should only be done where it is necessary to update the information for the ongoing administration of the file.</p> <p>2.6.2 3sHealth Representatives should not rely on stale-dated information as a basis for refusing to offer a product or service to a particular individual, except where reasonably necessary to protect the interests of the organization.</p>
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	<p><b>2.7 Safeguards</b></p> <p>2.7.1 3sHealth will maintain reasonable policies, procedures, and practices to help ensure the security and confidentiality of PI and PHI.</p> <p>2.7.2 Such policies, procedures, and practices include (without limitation) the following:</p> <ul style="list-style-type: none"> <li>(a) Need to Know Access: 3sHealth Representatives are only permitted to access PI and PHI as necessary to fulfill legitimate job or service functions.</li> <li>(b) Transmittal of Information: 3sHealth Representatives shall use reasonable care to ensure that the method of transmitting PI and PHI (whether by telephone, mail, fax, e-mail, or otherwise) is sufficiently secure taking into account the sensitivity of the information.</li> <li>(c) Locked Filing Cabinets: When not in use, 3sHealth Representatives shall ensure that client files are stored in the appropriate filing cabinets. Such filing cabinets shall be locked outside of regular business hours.</li> <li>(d) Passwords/Access Cards: 3sHealth Representatives shall protect the security of their computer passwords, building access cards, and any other security codes or devices issued to them. 3sHealth Representatives shall not share such codes or devices with any person.</li> <li>(e) Security Incidents: 3sHealth Representatives who become aware of any privacy or security-related incident, or suspect the occurrence of any privacy or security-related incident, must report the matter to the Privacy Officer or appropriate management immediately. 3sHealth Representatives shall cooperate in the investigation of any such incidents. 3sHealth will complete a privacy incident review to determine whether the incident results in a real risk of significant harm to an individual.</li> <li>(f) Computer Workstations/Laptops: 3sHealth Information Technology (IT) shall activate hard-disk encryption on all laptop computers. 3sHealth Representatives must set a password protected keyboard/screen lock that is automatically activated after a period of inactivity. 3sHealth Representatives should use all reasonable efforts to prevent unauthorized persons from viewing computer screens. 3sHealth Representatives should not leave laptops unattended unless necessary and, when necessary, should use a locking device to secure laptops or otherwise take steps to prevent theft of the laptop. Please refer to the IT policies on 3sHealth TeamNet regarding Computer Use and Data Use.</li> </ul>
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	<p>(g) 3sHealth Representative Security:</p> <ul style="list-style-type: none"> <li>• 3sHealth and all 3sHealth Representatives will take reasonable steps to ensure that only 3sHealth Representatives who have a “need-to-know” are authorized to have access to sensitive IT systems, information, or assets.</li> <li>• A record will be maintained and be readily available documenting the issuance and retrieval of security related items such as User IDs, passwords, keys, codes, combinations, and badges.</li> <li>• 3sHealth will, where appropriate, obtain confidentiality agreements from 3sHealth Representatives.</li> <li>• On termination or transfer of 3sHealth Representatives, or when a particular 3sHealth Representative’s duties no longer require access to data, 3sHealth will immediately: <ul style="list-style-type: none"> <li>• revoke access privileges (e.g. User IDs and passwords) to system and data resources and secure areas;</li> <li>• retrieve sensitive information including access control items (e.g. keys and badges); and</li> <li>• retrieve all hardware, software, and documentation issued or loaned to the 3sHealth Representative.</li> </ul> </li> </ul> <p>(h) Use of Service Providers:</p> <ul style="list-style-type: none"> <li>• As part of the delivery of 3sHealth's services, 3sHealth utilizes various service providers such as Deloitte Canada and Oracle Canada, which can include cloud-based services.</li> <li>• Where 3sHealth utilizes cloud-based services, there are reasonable safeguards in place to protect the PI and PHI, including a contractual obligation to store all PI and PHI in Canada.</li> </ul> <p>2.7.3 3sHealth Representatives are responsible for complying with the above security policies and any other security policies and procedures introduced from time to time.</p> <p><b>2.8 Openness</b></p> <p>2.8.1 Inquiries from the public as to 3sHealth’s privacy policies and practices shall be promptly referred to the 3sHealth Privacy Officer for handling.</p>
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	<p>2.8.2 Upon request, the public shall be provided with the following privacy-related information:</p> <ul style="list-style-type: none"> <li>• The name, title, and address of the Privacy Officer.</li> <li>• 3sHealth’s processes for allowing an individual to access the information it may hold about the individual (see Section 2.9).</li> <li>• The type of PI and PHI held by 3sHealth and a general account of its use.</li> </ul> <p><b>2.9 Individual Access</b></p> <p>2.9.1 All requests from individuals for access to their PI and PHI must be reviewed and administered in accordance with this policy.</p> <p>2.9.2 3sHealth will provide access to PI and PHI, and will amend inaccurate or incomplete information, subject to any applicable exceptions or exemptions under applicable laws.</p> <p>2.9.3 All requests submitted by an individual must be in writing and submitted via paper or electronically. If 3sHealth employees have questions about the disclosure or correction of information, they will consult with the Privacy Officer.</p> <p>2.9.4 Written requests for access to PI and PHI shall be made using the form attached to this Policy as <a href="#">Appendix A</a> or <a href="#">Appendix B</a>. Individuals wishing to request access to their PI or PHI shall be provided with a copy of this form.</p> <p>2.9.5 3sHealth will use reasonable efforts to assist an individual who requires assistance in order to request access to their PI or PHI.</p> <p>2.9.6 3sHealth will respond to a written access request within 30 days of receipt of the request. This means requests in the possession of 3sHealth Representatives must be forwarded to the Privacy Officer on the same day as the request is received. If the Privacy Officer is unavailable, the matter should be immediately forwarded to other senior management who may refer to outside legal counsel.</p> <p>2.9.7 3sHealth reserves the right to extend the time period for responding to an access request. Only the Privacy Officer, or in the absence of the Privacy Officer, senior management after consultation with outside legal counsel, is permitted to extend such time frame.</p>
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	<p>2.9.8 3sHealth may charge any reasonable costs relating to a request for access to information to the individual making the request. The Privacy Officer shall provide notice of any applicable cost to the individual making the request prior to proceeding with the request.</p> <p>2.9.9 If a request for access to PI or PHI is refused, the individual shall be informed in writing by the Privacy Officer of the refusal and the grounds for the refusal.</p> <p><b>2.10 Challenging Compliance</b></p> <p>2.10.1 An individual may file a complaint with the Privacy Officer if their rights have been violated. All complaints received by 3sHealth Representatives shall be immediately forwarded to the Privacy Officer for investigation and handling.</p> <p>2.10.2 The Privacy Officer will investigate all complaints received, and if necessary, appropriate steps will be taken to correct and resolve the complaint.</p> <p>2.10.3 Individuals who wish to file a complaint must complete the form attached as <a href="#">Appendix C</a> to this Policy. Individuals wishing to file a complaint shall be provided with a copy of 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 respond in either case.</p>
<b>4</b>	<b>Definitions</b>
	<p><b>“collect, collection”</b> means the process of gathering or obtaining PI or PHI from a source external to 3sHealth. Sources of the 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>

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	<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 PI or PHI held by 3sHealth to outside sources (for example, disclosing personal information to third party service providers or consultants).</p> <p>“<b>personal information (PI)</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>personal health information (PHI)</b>” means information in any form that identifies an individual that relates to their health and health care including, health history, health care programs and services, health care providers, health card numbers, and other personal identification numbers.</p> <p>“<b>purpose</b>” means the purpose for which PI or PHI is collected, used, or disclosed.</p> <p>“<b>use</b>” means any internal access and/or use of PI or PHI by 3sHealth.</p>
5	<h3>References</h3>
	<p>This policy aligns with the following privacy legislation:</p> <p><a href="#">The Health Information Protection Act (HIPA)</a></p> <p><a href="#">The Local Authority Freedom of Information and Protection of Privacy Act (LAFOIP)</a></p>
6	<h3>Appendices</h3>
	<p><u>Additional Information:</u></p> <ol style="list-style-type: none"> <li>1. <u>Access to Information Request Form (LA FOIP):</u> Request for access to information or records, please see <a href="#">Appendix A</a>.</li> <li>2. <u>Access to PHI Request Form:</u> Request for access to personal health information, please see <a href="#">Appendix B</a>.</li> <li>3. <u>Complaint Form:</u> Privacy Complaint Form, please see <a href="#">Appendix C</a>.</li> <li>4. <u>Website Supplement for Users of the 3sHealth Website:</u> Please see <a href="#">Appendix D</a> to the Policy for more information about our privacy practices as it relates to your use of the 3sHealth website.</li> </ol>

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		<p>5. <u>Residents of the European Union GDPR Supplement</u>: 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 <a href="#">Appendix E</a> to this Policy for more information.</p>
<b>9</b>	<b>Approval</b>	3sHealth Senior Leadership Team
<b>10</b>	<b>Approval Date</b>	<i>This policy was approved on: <b>June 26, 2022</b></i>
<b>11</b>	<b>Review Date(s)</b>	<i>This policy was reviewed/revised on: <b>July 25, 2022</b></i>
<b>12</b>	<b>Enquiries</b>	Any questions or clarification required should be referred to the 3sHealth Privacy Officer at <a href="mailto:PrivacyOfficer@3sHealth.ca">PrivacyOfficer@3sHealth.ca</a>
<b>13</b>	<b>Policy Owner</b>	Privacy Officer