

## TYZE PRIVACY POLICY

Effective as of: July 5, 2013

Tyze Personal Networks Ltd. (“**Tyze**”, “**Us**”, “**Our**” or “**We**”), with this privacy policy, as it may be modified from time to time, (the “**Policy**”) outlines what Personal Information (as defined below) we collect, how we use and disclose such Personal Information, and how we otherwise safeguard Personal Information when you (identified herein as User or with “you,” “your,” or “you”) use Tyze’s online solution found at [www.tyze.com](http://www.tyze.com) that allows individuals, groups and organizations to create online personal networks (the “**Services**”) based on the network model of care for health and social care.

This Privacy Policy applies whether you are accessing to use the Services through [www.tyze.com](http://www.tyze.com) via a personal computer, a mobile device or any other technology or devices now known or hereafter developed or discovered and whether you are accessing the Services and the related web site as a registered User or other visitor. Collection of Personal Information, however, will vary with your particular utilization of the Services and its related web site. Tyze’s HIPAA Privacy Policies may also apply to the collection of certain information under certain circumstances. If any part of this Policy is determined to be invalid or unenforceable pursuant to applicable law, then the invalid or unenforceable provision will be deemed superseded by a valid, enforceable provision that most closely matches the intent of the original provision and the remainder of this Policy shall continue in force and effect.

This Policy does not apply to the practices of companies or other entities that Tyze does not manage or control. This Policy does not apply to information regarding corporations or other non-individuals. Our Services may contain links to other websites, which are not governed by this Policy. You should read the individual privacy policies of such websites, and make an informed decision whether or not to use these websites based upon their privacy practices.

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1. **What Is Personal Information?**

“Personal Information” means information about or that can identify an individual, and includes things such as gender, age, ethnicity, financial and credit information, health information, consumer preference information, customer profiles, ID numbers and any other data assigned to an individual.

2. **Collection of Personal Information.**

(a) Information that you Provide. We will request from you or you may otherwise voluntarily provide Us with Personal Information in the course of your use of the Services. We will

also receive Personal Information about you from a broad range of activities through the Services, including, but not limited to, your and others' inputs to the Services. We will also collect Personal Information through e-mail or other communications or interaction we may have with you relating to the Services.

- (b) IP Information. In general, We collect and use technical information and data regarding your access and use of Services. When you visit Services via a web browser, Our servers record the information that your browser automatically sends whenever visiting or using any of the Services, including your web request, the Internet Protocol (“IP”) address and browser configuration of your Device (as defined below), the date and time of your request, the uniform resource locator of the referring and/or exiting websites. In this Policy, “**Device**” means a computer, mobile phone, handset, tablet or other device enabled for internet access and/or communication.
- (c) Tags and Analytical Tracking. As part of making the Services available, We use tracking tools such as scripts, internet tags, cookies, graphic tags, web beacons and similar means (collectively, “**Tags**”) on the Services to enhance functionality and navigation for Our Services' Users. Portions of the Services may use analytical tools that are operated by Us and third party providers (collectively, the “**Analytical Tools**”).

We may use Tags on the Services to count Users and to recognize Users by accessing Tags. Being able to access Tags allows Us to personalize the Services and improve your experience at the Services. We may also include Tags in HTML-formatted e-mail messages that We send to determine which e-mail messages were opened.

Information tracked through these mechanisms includes, but is not limited to: (i) your IP address and other IP information set out in subparagraph 2(b) above; (ii) the type of web browser and operating system being used; (iii) the pages of Services that you visit; and/or (iv) other websites that you have viewed before visiting one of the Services. Some types of Tags, such as cookies, may be disabled whereas others may not. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. Please note that if you disable cookies, you may be unable to access some customized features on the Services. [Learn more about our use of Cookies](#).

In the case of Analytical Tools, the information generated by the Tags about your use of the Services (including your IP address) may be transmitted to and stored on servers located outside of Canada. The information generated by the Tags may also be transferred to third party providers of Analytical Tools and other aspects of the Services. This information will be used for the purpose of evaluating your use of the Services, compiling reports on Services activity, and otherwise providing aspects of the Services.

By using the Services, you consent to the processing of data about you in the manner and for the purposes set out above.

- (d) Third Party Collections. In accordance with our usage practices outlined in this Policy, we may sometimes collect, combine, or aggregate Personal Information about you from other sources, provided that such sources confirm to us that they are permitted to share such information, such information is publicly available, or the collection is required or permitted by law. Examples of collection from other sources may include collections from:
- your healthcare or social service provider, governmental organization, health authority, community organization or other individual or organization involved in your care;

- service providers or systems that interoperate with the Services; or
- government agencies or registries.

3. **Use of Personal Information.** Tyze may collect and use your Personal Information for the following purposes:

- to verify User identity;
- to identify User preferences;
- to understand the service needs of Our Users;
- to deliver requested products and services;
- to provide, maintain, or support the Service to or for Our Users;
- to meet regulatory requirements;
- to process a registration;
- to send out information on the Services or other products and services;
- to conduct surveys or research initiatives in order to enhance the provision of the Services;
- to bill, process and/or collect payment;
- to help prevent or investigate fraud, theft of power or other breaches of the law;
- to perform statistical analyses of User behaviour and characteristics, in order to measure interest in and use of the various parts of the Services so as to improve design, navigation and experience of such Services; or
- as required or permitted by law.

4. Disclosure of Personal Information.

Under certain circumstances, Tyze will disclose your Personal Information:

- when you have consented to the disclosure;
- to fulfill the purpose for which the Personal Information was collected;
- when the Services we are providing to you require us to give information to third parties;
- where it is necessary to establish or collect fees;

- if we engage a third party to provide services to or with us (like computer back-up services or data centre services) in order to provide the Services. We may use service providers located outside of Canada, unless prohibited by law or your contract with us, and, if applicable, your Personal Information may be processed and stored in other countries and therefore may be subject to disclosure under the laws of those jurisdictions;
  - if there is a proposed transfer of Tyze's business or assets (or a part thereof), or a merger or amalgamation of Tyze with another entity, We may disclose your Personal Information to third parties as necessary for the purposes of such transaction (including due diligence purposes) and upon completion of such a transaction, your information will be one of the transferred assets;
  - when it is clearly in the interests of the individual and consent cannot be obtained in a timely way, or in an emergency that threatens a User's life, health or personal security; or
  - when we are required or permitted by law to do so.
5. **Extracted Data.** We may use your Personal Information to generate anonymized data related to use of the Services (collectively, "Extracted Data"). We may manipulate or combine Extracted Data to provide generalized, anonymous information. We may use Extracted Data for Our internal use and for sharing with your healthcare or social service providers, governmental organizations, health authorities, community organizations, Our social service providers of systems that interoperate with the Services, or Our business partners. Your identity and Personal Information will be kept anonymous in Extracted Data. Extracted Data may also be used for planning, healthcare and social services, research, analysis, statistical, and marketing purposes.
6. **Consent.** By providing Personal Information to us and by retaining us to provide you with Services, you voluntarily consent to the collection, use and disclosure practices for Personal Information as specified in this Policy. Without limiting the foregoing, we may also ask you from time to time to consent to particular collection, use, or disclosure practices related to your Personal Information, in which case we may ask for your consent electronically or in writing.
7. **Withdrawal of Consent.** Subject to certain exceptions permitted by applicable law, Individuals have the right to withdraw their consent to the collection, use, or disclosure of Personal Information at any time. Upon reasonable written notice given to Tyze, all Personal Information held by Tyze that is identifiable to that individual will be removed from our records and a notice of the impact of that removal will be provided to the individual. Notwithstanding the foregoing, if you withdraw consent Tyze nonetheless reserves the right to retain, collect, use and disclose Personal Information without your consent where we are permitted by law to do so.
8. **Opting Out.** You may wish to opt out of receiving certain information and marketing or promotional materials from Tyze. You may do so by contacting us at the addresses at the end of this Policy for certain information and marketing practices or by using the provided unsubscribe mechanism in a particular communication you received.
9. **Access to and Correction of Personal Information.** Individuals have the right to know what Personal Information Tyze has collected about them, how that information is being used and to whom it has been disclosed, as well as to verify and amend that information if it is incorrect. Upon receiving a written access and/or correction request and a reasonable handling fee determined by Tyze, and where the identity of the requestor can be confirmed, information held by Tyze that is identifiable to the requestor, as well as information on all use and disclosures of that information, will be released to the requestor within 30 days, except where that release is not required or is prohibited by law, and if necessary Tyze will correct the Personal Information of the requestor.

10. **Can I be Denied Access to My Personal Information?** Your rights to access your Personal Information are not absolute. We may deny access:

- when denial of access is required or permitted by law;
- when granting you access would have an unreasonable impact on other people's privacy;
- to protect Our organization rights and property; or
- where the request is frivolous or vexatious.

If We deny your request for access to, or refuse a request to correct Personal Information, we will explain why.

11. **Is My Personal Information Secure?** We will endeavor to use contractual arrangements to protect Personal Information disclosed to third parties. In addition, Tyze takes all commercially reasonable steps in accordance with generally recognized industry practices to ensure that your Personal Information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps we may take in order to protect your information are:

- premises security;
- restricted file access to Personal Information;
- deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access;
- encryption of Personal Information data in transit and in storage; and
- internal password and security policies.

We cannot guarantee the confidentiality or security of any e-mail communications or information sent by you to us via the Services. If you wish to send us confidential information, please notify us first to make arrangements.

12. **Retention of Contact Information and Personal Information.** Personal Information will be retained in accordance with this Policy only for as long as may be necessary or relevant for the identified purpose of collection, or as may be required or permitted by law, after which time it will be made anonymous or destroyed. .

13. **Changes to this Privacy Policy.** Tyze may change this Policy from time to time to accommodate changes in applicable law and to better reflect Tyze's collection and use practices for Personal Information. Tyze will endeavor to provide notice of any such changes and such changes will be effective from the date of revision.

14. **Your Responsibility for Privacy.** You should be aware that when Personal Information is voluntarily disclosed in the discussion forums or other public areas, that information, along with any information disclosed in your communication, can be viewed and used by third parties. Such third party activities are beyond Our control and this Policy does not apply to such information. Any submissions to public areas associated with the Services are therefore accepted with your understanding that they are accessible to third parties. If you do not want your comments to be viewed by third parties, you are advised not to make any submissions. Ultimately, you are

primarily responsible for maintaining the confidentiality of your Personal Information. Please be careful and responsible whenever you're online.

15. **Third Party Websites.** To the extent hyperlinks or gateways (whether through banner advertisements or otherwise) are utilized to access external or third party sites, you should be aware that these external or third party sites may collect Personal Information and are not controlled by Tyze and therefore, are not subject to this Privacy Policy. Tyze recommends that you check the privacy policies of these sites to determine how the proprietors of these third party sites will utilize your Personal Information.
16. **Children's Privacy.** Children in the United States cannot use Tyze Services. A minor (i.e., an individual under the age of 18) must not use Tyze's Services except with the authorization of the minor's guardian. In cases where you have authorized and allowed a minor to use the Services, you acknowledge and agree that you are providing confirmation of consent to Tyze's data collection and use practices (as reflected in this Privacy Policy) on behalf of the minor.
17. **Need More Information?** Should you have any questions or concerns about the privacy of information you provide to Tyze, or require any further information about Tyze's policies and practices regarding privacy (including Our use of service providers outside of Canada), please feel free to contact Us as follows:

Tyze Personal Networks  
Cindy Oxenbury, Privacy Officer  
6th Floor – 210 West Broadway  
Vancouver BC, V5Y 3W2  
Phone: 604-628-9594  
Toll Free: 1-888-517-8993  
Email: [privacy@tyze.com](mailto:privacy@tyze.com)