

PRIVACY POLICY

WELLNESSTOOLBOX (“**WELLNESSTOOLBOX**,” “**us**,” or “**our**”) respects the privacy of its users (“**you**” or “**your**”). The following privacy policy (the “**Privacy Policy**”) describes what information we collect, how we collect it, how we use it, with whom we may share it, and what choices you have regarding our collection, use, and sharing of your information.

Our Privacy Policy applies to information collected in accordance with our terms of use (the “**Terms of Use**,” available at www.wellnesstoolbox.ca). By accessing or using our services, you acknowledge that you have read and understood the Privacy Policy and that you accept and agree to be bound by the Privacy Policy.

WELLNESSTOOLBOX will not collect, use, or disclose personal or health information in any manner that is not in accordance with the *Health Information Act*, the *Freedom of Information and Protection of Privacy Act*, or any other law in force in the Province of Alberta.

WELLNESSTOOLBOX may collect personal or health information when you voluntarily complete any online application, request form, or survey. Information may be collected pursuant to sections 18–24 of the *Health Information Act*, and section 33 of the *Freedom of Information and Protection of Privacy Act*, as applicable.

We will use your health information and personal information as necessary to provide services and operate the WELLNESSTOOLBOX mobile application and website, including but not limited to, converting documents received from you or on your behalf to an appropriate electronic format and maintaining your account. We will use and disclose it for no other purpose, other than in the following circumstances: a) we are required to do so by law, including by a subpoena, warrant or court order; or b) for the purpose of a court proceeding or a proceeding before a quasi-judicial body to which WELLNESSTOOLBOX is a party.

SECTION 1 - INTERPRETATION

1.1 DEFINITIONS: In these Terms of Use, the following definitions apply:

“**Collected Information**” has the meaning ascribed to it in subsection 3.1.

“**WELLNESSTOOLBOX**,” “**us**,” and “**our**” means the University of Alberta research team conducting the research study and any of its affiliates, and their respective directors, officers, employees, agents, contractors, successors, permitted assigns, and permitted sublicensees.

“**Personal Information**” means information provided by you when opening an account with WELLNESSTOOLBOX, which *may* include your name, username, password, email address, phone number, mailing address, personal financial information, personal health information, or any other demographic or identifying information provided by you or obtained by WELLNESSTOOLBOX, including your internet protocol (IP) address. Personal Information is described further in subsection 3.2.

“Privacy Policy” means this document, as amended or supplemented by WELLNESSTOOLBOX from time to time.

“Terms of Use” means the document available at www.wellnesstoolbox.ca, as amended or supplemented by WELLNESSTOOLBOX from time to time.

“Third Party Materials” has the meaning ascribed to it in subsection 2.3.

“You” and **“your”** means you and any of your affiliates, and their respective heirs, directors, officers, employees, agents, contractors, successors, permitted assigns, and permitted sublicensees, as applicable.

1.2 HEADINGS: The bolded section and subsection headings used in this Privacy Policy have been inserted for reference and a matter of convenience only, and do not define, limit, or enlarge the scope or meaning of this Privacy Policy.

SECTION 2 - SCOPE OF PRIVACY POLICY

2.1 TERMS OF USE: This Privacy Policy is incorporated into the WELLNESSTOOLBOX Terms of Use (available at www.wellnesstoolbox.ca). WELLNESSTOOLBOX encourages you to read and become familiar with the Terms of Use. By accessing or using our Services, you acknowledge that you have read and understood the Terms of Use and that you accept and agree to be bound by the Terms of Use.

2.2 AMENDMENT OF PRIVACY POLICY BY WELLNESSTOOLBOX: WELLNESSTOOLBOX may amend the Privacy Policy at any time without prior notice to you. By continuing to access or use the Services after such modifications are made known to the public, you expressly agree to be bound by the amended Privacy Policy.

2.3 PRIVACY POLICY DOES NOT APPLY TO THIRD PARTY MATERIALS: The Services may comprise, link to, or otherwise reference websites, social media pages, applications, online marketplaces, software, servers, computer systems, networks, accounts, advertising, opinions, statements, products, services, or other materials that are provided or operated by third parties, including vendors (**“Third Party Materials”**). You understand that WELLNESSTOOLBOX has no control or responsibility over such Third Party Materials and that this Privacy Policy does not apply to the collection and use of any information that you share in respect of such Third Party Materials. WELLNESSTOOLBOX encourages you to review the privacy policies for any Third Party Materials before you share your information.

SECTION 3 - COLLECTION AND USE OF INFORMATION BY WELLNESSTOOLBOX

3.1 COLLECTION OF INFORMATION: WELLNESSTOOLBOX may collect certain information from or about you, including Personal Information, in connection with your access or use of our Services (collectively, the **“Collected Information”**). WELLNESSTOOLBOX collects information when you give it to us (such as by opening an account), when you give us permission to obtain it (such as when you give us permission to

link your account to a payment method), or when we obtain it from other sources (such as from business partners or third parties that make our services available to you, from vendors with whom you connect using our Services, or from commercially available third-party sources including credit reporting agencies). WELLNESSTOOLBOX may combine information we receive from all such sources.

3.2 ONGOING USE OF INFORMATION: If you choose to register and create a personal health account within your WELLNESSTOOLBOX account, your health information may be used by WELLNESSTOOLBOX for the purposes of providing, maintaining, and improving the Services, as well as for health research purposes. Whenever possible we will only use non-identifying aggregate information for such purposes.

3.3 TYPES OF INFORMATION: Collected Information includes personal and health information and information about how you interact with our Services, each as described below:

3.3.1 WELLNESSTOOLBOX may collect information that can be used to identify you (“**Personal Information**”). Personal Information that we collect depends on which aspects of our Services you access or use and may include your name, health records, health information, social security number, social insurance number, date of birth, contact information, biometric information, financial information, and any other information that WELLNESSTOOLBOX requires in order to provide you with access and use of our Services.

3.3.2 WELLNESSTOOLBOX may collect your personal health information when you voluntarily enter information into your WELLNESSTOOLBOX Account. The information is collected as part of the health service we are offering and only information voluntarily entered by the user is actually collected by the health service. Information is collected pursuant to Part 3 of the *Health Information Act* and section 33 of the *Freedom of Information and Protection of Privacy Act*, as applicable.

3.3.3 WELLNESSTOOLBOX also collects information regarding how you interact with our Services, the transactions you complete with vendors with whom you connect using our Services, which information may include pages you view, links you click or hover over, selections you make on the Websites, your web browser’s HTTP referrer header, features you use, preferences you set, your web browser type and version, the operating system type and version of the device you are using to access our Services, the internet protocol (IP) address of the device you are using to access our Services or any aspect of our Services, general physical location, internet service provider, in addition to any other information collected as further described in this Privacy Policy or identified by WELLNESSTOOLBOX in writing.

3.4 USE OF INFORMATION: WELLNESSTOOLBOX may use the information we collect for various purposes as permitted by applicable law including without limitation to (i) provide you with goods and services including the Services, and assist vendors with whom

you connect using our Services to provide you with goods and services; (ii) personalize your experience accessing or using the Services; (iii) improve our goods and services including the Services; (iv) improve our customer service; (v) process transactions; (vi) administer a contest, promotion, advertising campaign, survey, or other aspect of the Services; (vii) send periodic emails, messages, or other communications; (viii) notify you about our products and services that may be of interest to you; (ix) notify you about changes to our Terms of Use, Privacy Policy, and other policies; and (x) for health research purposes. We may also use the information we collect as otherwise disclosed to you at the point of collection or for any other purposes with your consent.

3.5 SURVEYS AND POLLS: You may wish to participate in online polls and surveys, and other promotions that WELLNESSTOOLBOX may offer from time to time. Participation in these polls, surveys, and promotions is completely voluntary; you have a choice about whether or not to disclose information required to enter. Information requested may include Personal Information such as name, address, date of birth, phone number, e-mail address, username, and/or similar information. In addition, as noted above, WELLNESSTOOLBOX may share this information with our affiliates and other organizations or entities. In connection with any online polls, surveys, contests, sweepstakes, and other promotions that we may offer from time to time, we use the information you provide to administer the polls, surveys, contests, sweepstakes, and other promotions. Subject to applicable contractual or legal restrictions, we also may use the information to communicate with you, or the other people you select, about our services or our marketing partners may use such information to communicate with you about the online polls, surveys, contests, sweepstakes, or other promotions or their products and services.

3.6 SHARING OF INFORMATION: WELLNESSTOOLBOX may share Collected Information with your consent. WELLNESSTOOLBOX may also share your information with any of our affiliates, subsidiaries, and vendors with whom you connect using our Services as permitted by law, including for business purposes such as providing our Services to you, processing transactions, managing your account(s), offering our products and services to you, obtaining information about your transactions and experience or for any other purpose described in this Privacy Policy or the Terms of Use, or any other lawful purposes. WELLNESSTOOLBOX also works with a number of non-affiliated companies that help service your account or assist us with providing the Services to you. WELLNESSTOOLBOX may share pertinent information about you with these companies as permitted by applicable law. All such sharing of information with third parties will be subject to obligations of confidentiality between WELLNESSTOOLBOX and the third party.

3.7 DISCLOSURE OF INFORMATION: WELLNESSTOOLBOX reserves the right to disclose your Personal Information without your knowledge or consent in certain circumstances. Such disclosure may be done when WELLNESSTOOLBOX, in its sole discretion, deems it necessary to protect our rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the Terms of Use. We may use and disclose Collected Information to establish or exercise our legal rights, to enforce the Terms of Use, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or

suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

3.8 NON-IDENTIFIABLE INFORMATION: WELLNESSTOOLBOX does not sell, rent, or lease our user lists or the identity of individual users to third parties without your consent. However, we may use and disclose certain aggregated, deidentified information to our affiliates, subsidiaries, business partners, third-party service providers, or other recipients, as permitted by law for certain purposes including, without limitation, advertising, informational, comparison, research, general service, or product improvement. Such information may also be shared with WELLNESSTOOLBOX customers, including the company through which our service is made available to you. However, such information shall not be personally identifiable to any user.

3.9 INFORMATION REQUEST: You may submit a written request to obtain the following from WELLNESSTOOLBOX:

3.9.1 Your Personal Information that is under the custody or control of WELLNESSTOOLBOX.

3.9.2 Information about the purpose or purposes for which your Personal Information that is under the custody or control of WELLNESSTOOLBOX has been or is being used.

3.9.3 Names of the persons to whom your Personal Information has been or is being disclosed, and the circumstances surrounding this disclosure.

Each such request will be responded to as accurately and completely as reasonably possible. Your ability to view your Personal Information under the custody or control of WELLNESSTOOLBOX is not absolute. WELLNESSTOOLBOX will not disclose Personal Information where doing so would likely reveal Personal Information about a third party or where WELLNESSTOOLBOX chooses not to disclose Personal Information, including where disclosure would reveal confidential business information or trade secrets.

3.10 CORRECTION OF ERRORS: You may submit a written request to correct errors or omissions in your Personal Information under the custody or control of WELLNESSTOOLBOX. If you successfully demonstrate an inaccuracy or incompleteness, WELLNESSTOOLBOX will amend the inaccuracy or incompleteness as required and, if reasonable to do so, send correction notifications to any persons to whom the incorrect information was disclosed.

3.11 PROTECTION OF INFORMATION: WELLNESSTOOLBOX takes commercially reasonable measures that comply with federal and provincial laws to secure and protect information under our custody or control. These measures include computer safeguards and secured files and buildings. Nevertheless, no security system is impenetrable. We cannot guarantee that any information in our custody or control will be totally secure. You agree to immediately notify WELLNESSTOOLBOX of any disclosure of your information, breach of this Privacy Policy, or breach of the Terms of Use.

SECTION 4 - ELECTRONIC AND INTERNET TECHNOLOGIES

- 4.1 COOKIES AND USAGE REPORTS:** WELLNESSTOOLBOX may use technologies such as cookies, beacons, tags and scripts in association with our Services. By placing a small file known as a “cookie” on your computer (or other device), WELLNESSTOOLBOX and its partners, affiliates, or third party providers may passively gather information about your access or use of our Services for several reasons, including, but not limited to, the following: statistics collection and analysis, optimization, analytics (as described below), market research, and maintenance of user login information. For example, cookies on our websites may track “macro” information, such as the number of independent visits made to the websites each day, or “micro” information, such as individual users’ internet protocol (IP) addresses, downloads, and related traffic history (some of this information may be collected by web beacons, see below). The information that WELLNESSTOOLBOX and our third party service providers track with cookies may include, but is not necessarily limited to, the type of browser (such as Google Chrome, Mozilla Firefox, Apple Safari, or Microsoft Edge) and internet-connected device being used to access or use our Services, your internet protocol (IP) address, your home domain or internet service provider, your referrer URL (which is the URL for the website that you were viewing prior to accessing or using our Services), how you were directed to our Services, which specific aspects of the Services you access or use, how long you access or use each aspect of the Services, the time and date you access or use our Services, and the total number of users of the Services and any aspects of the Services. We may also use your internet protocol (IP) address to determine the general physical location of your computer or device and understand from what geographic locations our Services users come and to tailor our Services to meet our users’ needs (e.g., if a visitor is from Canada, we may use geolocation information to ensure our Canada team responds to such visitor).
- 4.2 REJECTION OF COOKIES:** Most internet browser applications will allow you to configure the browser to reject cookies. However, setting your browser to reject cookies may, in certain instances, prevent you from taking full advantage of our Services or cause some aspects of the Services to function improperly or more slowly.
- 4.3 WEB ANALYTICS SERVICES:** WELLNESSTOOLBOX websites use certain web analytics services provided by third parties in order to better understand your use of our websites (or other aspects of our Services) and how we can improve our Services. Such analytics providers may collect information such as how often users access or use the Services, what aspects of the Services they access or use, and what other websites they used prior to accessing or using the Services. WELLNESSTOOLBOX does not combine the information collected through the use of such analytics services with your Personal Information. Such third party analytics providers may utilize the data collected to track and examine use of our Services, to prepare reports on its activities and share them with us.

As part of our suite of analytics, we also utilize web analysis services provided by Google. Google’s ability to use and share information collected by Google Analytics about your visits to our websites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. Google utilizes the data collected to track and examine the access or use of our Services, to prepare reports on its activities and share them with other Google services.

Google may use the data collected to contextualize and personalize the ads of its own advertising network. To more fully understand how Google may use the data it collects, please review “How Google uses information from sites or apps that use our services” (available at <https://policies.google.com/technologies/partner-sites>).

- 4.4 WEB BEACONS:** Some aspects of our Services may also contain electronic images known as web beacons (sometimes known as clear gifs) that allow WELLNESSTOOLBOX, and its third party providers or affiliates, to count and track users who have accessed or used certain aspects of the Services and other similar traffic history. Web beacons collect only limited information, including a cookie number, time, and date of a page view, and a description of the page on which the Web beacon resides. Web beacons do not collect any of your Personal Information.
- 4.5 DO NOT TRACK REQUESTS:** WELLNESSTOOLBOX adheres to the standards set out in this Privacy Policy and does not monitor or follow any “Do Not Track” browser requests.

SECTION 5 - GENERAL

- 5.1 AGE OF MAJORITY:** Our Services are not intended for access or use by children under eighteen (18) years of age. WELLNESSTOOLBOX will not knowingly collect any information from children under the age of eighteen (18). Furthermore, WELLNESSTOOLBOX may restrict entries to any polls, surveys, or promotions to entrants who are at least eighteen (18) years of age.
- 5.2 LOCATION OF SERVERS AND CENTRAL DATABASE:** Please be aware that your information may be transferred to, stored, or processed outside of your country. WELLNESSTOOLBOX takes steps to protect your privacy regardless of where our Services are located, where our central database is operated, or from which country you are accessing or using our Services. By accessing or using our Services, you understand and consent that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.
- 5.3 UNSUBSCRIBE:** WELLNESSTOOLBOX wants to communicate with you only if you want to hear from us. If you prefer not to receive information from us or would like to update or change your Personal Information or preferences, please CONTACT US. However, WELLNESSTOOLBOX may send you service-related announcements, announcements about changes in policies, and transactional communications such as confirmations and receipts, from time to time through the general operation of our Services, by e-mail, messages, or otherwise. If you do not want to receive any communications from us in the future, click the “unsubscribe” reference in any communication we send you.

SECTION 6 - CONTACT WELLNESSTOOLBOX

- 6.1 CONTACT US:** WELLNESSTOOLBOX welcomes any comments or questions you may have regarding this Privacy Policy, the Terms of Use, or our Services. Please send any comments or questions to: talktous@wellnesstoolbox.ca.

- 6.2 CORESPONDENCE:** If you correspond with WELLNESSTOOLBOX, the Collected Information may include the content of, and metadata regarding, any correspondence you may have with us. We may share your messages with those within our organization who are most capable of addressing the issues contained in your message. We will keep a copy of your message until we have had an opportunity to address your concerns.
- 6.3 DATE:** This Privacy Policy was last updated on 17 October 2022. Please check back periodically for updates and changes.