

SMG Virtual Care Privacy Policy

SMG Virtual Care Privacy Statement

2402575 ALBERTA LTD. doing business as SMG Virtual Care (“SMG Virtual Care”) SMG Virtual Care is committed to protecting the privacy and confidentiality of the personal information of patients and to visitors to its website. SMG Virtual Care is also committed to complying with the privacy legislation that governs the collection, use, disclosure, storage, and ultimate disposition of its patients’ and website visitors’ (your) personal information in ways that safeguard privacy.

Collection of Your Personal Information

We may collect and use certain personal information from you during your registration with us or during your appointment with a health services provider. Collected information may include, without limitation:

Contact Information for registration (name, telephone number, e-mail address, Alberta Health identification number)

Personal Information for identifying purposes (birth date, address, and a driver’s license, passport or other government issued identification for verification purposes).

Health Information (background and current information relating to your physical and mental health, emergency contact information, contact information for family or friends with permission to assist you in your care)

Sensitive Information (race, sexual orientation, gender, or national origin)

Financial Information (name, billing address, telephone number, or any other financial information).

Technical information: IP address, device mode, device ID, OS version, device language, operating system, browser type and geolocation data

We collect most of this Personal Information directly from you when visit our Site, when you register on our site and fill out forms, when we communicate with you via email or text, when we speak to you by phone and/or when we provide services to you in a video appointment.

When you make payments through our site or the services, we direct you through to our payment processors. We do not collect or store financial account information, though we may receive transaction identifiers and summary information to confirm the payment but that information that does not include credit card or bank account numbers.

We also collect information through cookies and third-party tools.

Why we collect, use and disclose your personal information

We collect and use your personal information in order to

- learn more about you and to verify your identity,
- communicate with you, other medical practitioners, and, if you choose, your family and friends
- provide you with medical services and information
- fulfill any other purpose, with your consent, for which you provide your personal information
- operate, maintain, supervise, administer (including the collection of any fees), and enhance our services
- To carry out our obligations and enforce our rights
- Anonymize and aggregate information from users of our website any social media interactions for analytics and reporting. Please note, we do not use these analytics and reporting for any patient information.
- To respond to law enforcement requests, court orders, and subpoenas and to carry out our legal and contractual obligations
- Authenticate use, detect fraudulent use, and otherwise maintain the security of our site and services

If any portion of our medical advice to you is to recommend that you attend at an emergency department, clinic, or any other follow-up in person medical services, we are required by law for continuity of care to provide a report of your visit to the emergency department, clinic, or physician to which you are referred.

We collect, use or disclose your personal information for the purposes that we have identified, for compliance with legal requirements and for purposes that a reasonable person would consider appropriate in the circumstances.

Consent

Most of the personal information that SMG Virtual Care collects, uses and discloses is provided by you or collected as a result of your visit to our site or your use of our services. By visiting our site, by attending a virtual medical appointment and by providing us with your personal information, you consent to SMG Virtual Care's collection, use and disclosure of your personal information as set forth in this policy or authorized by law. You are considered to have given implied consent when SMG Virtual Care's purpose for collecting, using or disclosing personal information would be considered obvious and you use our site or voluntarily provide your personal information for that obvious purpose. You may withdraw your consent at any time, but not where the withdrawal of your consent would frustrate the performance of a legal obligation, and in many cases such withdrawal may well result in a reduction of services available to you.

When we collect, use and disclose

We collect your personal information as follows:

- we collect the IP address of visitors when you visit our website;
- we collect personal information when you register as a patient and provide registration information;
- we collect personal information when we communicate virtually (via video, through our platform and service providers, text or email) or directly (via telephone) with any of our staff and provide medical information;
- we collect personal information when you attend a video appointment and provide details of your health concerns and medical information;
- we collect personal information when you communicate with any of our staff and regarding any of our services; and
- we collect personal information when you have any other communications with SMG Virtual Care.

When you visit the SMG Virtual Care website, we also collect information about the computer on which you access the web site including: your IP address, the type of operating system and the browser you use, the pages you visit on the SMG Virtual Care site, and the links you click on the SMG Virtual Care site. We collect this information to facilitate the operation and security of our website. This information is collected in the system logs for a limited time and for review only if required. Only system administrators or persons provided with access for the purpose of web development can log into our protected website to see the logs, which are only available for a limited time.

When you visit the SMG Virtual Care registration page, we collect your Alberta Health Services personal number in addition to your contact information and address in order to allow you to book an appointment. This information is recorded in our medical record system consistent with our obligations as medical practitioner. When you attend at a video appointment, SMG Virtual Care and its providers will maintain a record of the information that you provide to us and the services we provide you in their appointment notes. We will provide your medical information to other medical practitioners as requested by you or as required by law and will otherwise maintain the confidentiality of your medical information in accordance with applicable local, provincial and federal law.

Our system uses cookies and other technical tools to collect session ID information to “bookmark” that a specific computer accessed our website on the particular day and time.

We also have an extension (that is, a third-party cookie) for analytics for users of the site and social media links that collects additional details such as the type of device used and, if “location services” are enabled, its location. These cookies and tools may also store some of your personal information that you agreed to when signing up for the tools. We do not use the analytics for patients in video appointments.

SMG Virtual Care will, in a manner that is consistent with or required by law, collect, use and disclose personal information that is necessary to fulfill the purposes identified in this policy, unless we receive further consent. We will not sell or rent your personal information without your consent.

Disclosure outside of SMG Virtual Care

SMG Virtual Care will not disclose your personal information without your permission unless we have received your consent or we are required or authorized by law to do so. For example:

- If you post any public comments to our website, we provide the public with your name.
- If you register for any online video consultation offered by SMG Virtual Care some or all of the personal information you provide may have to be share with other medical health care providers, either as consented to by you or as required by law.
- Please note that when you attend an online video consultation with SMG Virtual Care, your participation in the appointment will be subject to your web browser's privacy and security practices and policies.
- Our third-party website developer and our platform provider and a limited number of SMG Virtual Care employees have administrative access to our website to fix bugs, to optimize the website performance, or to continue to develop new applications to work for or with our SMG Virtual Care website.
- The personal information that SMG Virtual Care holds is stored and hosted on servers owned and managed by SMG Virtual Care.

Disclosure within SMG Virtual Care

Within SMG Virtual Care, some of your personal information is used and disclosed. For example:

- If you have a question for SMG Virtual Care, the personal information contained in your question may be forwarded to an appropriate SMG Virtual Care person for response.
- If you have an appointment with more than one of our health services providers, the personal information contained in your medical record held with us may be viewed by any of the health service providers you may see.

Your Disclosure

We ask that you not provide us with any medical information about anyone else without their permission.

We ask that you protect our privacy as well. You will not (you do not have permission to) and you will ensure that you do not directly or indirectly authorize or provide any persons present during the appointment to:

- photograph,
- record (audio or video),
- stream or
- otherwise post on Social media, the Internet or any other media now know or in future developed

any of our audio or video consultations without the prior written permission of the medical practitioner with whom you are meeting.

Access to your personal information

SMG Virtual Care will make reasonable efforts to ensure that your personal information is accurate and complete. You may ask SMG Virtual Care to correct your personal information by emailing info@online-doctors.com. If SMG Virtual Care is satisfied that your request for correction is reasonable, we will make those corrections. If SMG Virtual Care does not agree with your request for correction, we will note the requested correction on copies of the personal information under our custody or control.

Security of your personal information

We employ appropriate security measures and ensure that only authorized individuals will have access to your personal information.

Retention and destruction of your personal information

We will keep your personal information consistent with our records retention policy or for as long as it is required by law, whichever is longer. When your personal information is no longer required, SMG Virtual Care will destroy it in a confidential, secure manner.

Applicable legislation

SMG Virtual Care will follow the legislation in effect in Alberta for the collection, use, disclosure, retention, and disposal of your personal information.

Questions about SMG Virtual Care's handling of your personal information should be sent to info@online-doctors.com. If you are not satisfied with SMG Virtual Care's response to your question, you may advise the privacy officer that you remain unsatisfied. If, after SMG Virtual Care responds, you remain unsatisfied, you may complain to the Privacy Commissioner in Barbados.