

# Privacy Policy

## Summary

The management of personal information is fundamental to TELUS Health's services and we are committed to protecting your privacy.

TELUS Health collects and uses personal information to identify you, establish eligibility, and to provide technology-enabled total health, well-being and human resources services (such as pensions and benefits, employee assistance programmes, and health management programmes), including through our websites and apps. We also use your information for our own purposes, including to analyse and improve our services and for communications.

Please see the headings below to get more detailed information on how TELUS Health handles your personal information and on any topics of interest in our privacy policy.

## About This Privacy Policy

We created this privacy policy to tell you:

- What personal information we might collect about you;
- What we might do with that personal information; and
- Your choices about the personal information you provide.

This policy covers our websites, mobile apps, services provided through these platforms or otherwise accessed by a user (such as our counselling and well-being services) and any other interactions you may have with us (by telephone, email, or in person). This policy specifically covers our handling of personal information relating to identifiable individuals and does not apply to proprietary business information.

Some of our services are provided on behalf of our clients, which means our client remains primarily responsible for your personal information. For instance, we may be providing services on behalf of your employer or plan sponsor. In these circumstances, we may re-direct a query about our use of your personal information to our client.

## Getting Your Consent

As part of using our services or interacting with us, we may collect and process some details about you. When we do so, we will collect, use or share your personal information with your consent for the purposes we've informed you of, or as may be otherwise permitted or required by law. Your consent can be express or implied. For example, by participating in your benefits plan, you consent to TELUS Health's collection and use of your personal information to provide services to that plan. In some situations, we may get consent directly from you (including as described in this privacy policy). In other situations, we may rely on the consent you provided to your employer or benefits sponsor.

You can withhold or withdraw your consent for us to collect, use or share your personal information, as long as there are no legal or contractual requirements for us to process your information. Depending on the circumstances, however, withdrawal of your consent may impact our ability to serve you, or in the case of administering benefits, it may prevent us from processing your claims.

## Where We Get Your Information

We collect personal information in the following ways:

- Directly from you;
- From your use of TELUS Health's services, programmes, websites and apps;
- From your employer, association, insurer or benefits plan sponsor;
- When you attend a TELUS Health site or event;
- When you apply for a position at TELUS Health;
- If you contact us with a complaint or query;
- When you engage with us over social media; and/or
- From legally authorised third parties.

## Children's Information

We will not knowingly collect, use or share personal information if you are under the age of majority in your area without the permission of your parent or guardian. If you are under age and want to access our counselling and wellness services, your parent or guardian needs to contact TELUS Health on your behalf.

## What Information We Collect and Why

Our collection and use of your personal information depends on what products and services your sponsoring organisation chooses to make available to you, which TELUS Health products and services you choose to participate in, and what information you choose to provide to us. We may collect and use the following types of information for the following purposes:

Personal Information Category	Types of Information We May Collect	How We May Use It
Identity information	Your name, username, employee number or similar identifier, marital status, date of birth and reported gender	<ul style="list-style-type: none"><li>• To identify and authenticate you</li><li>• To communicate with you</li><li>• To create and administer your account when you register for our service, including through our websites and apps</li></ul>
Contact information	Your billing address, postal address, email address and telephone numbers	<ul style="list-style-type: none"><li>• To communicate with you and respond to your inquiries</li><li>• To inform you of news about our products and services, as well as special promotions, offers or events</li><li>• To create and administer your account when you register for</li></ul>

Personal Information Category	Types of Information We May Collect	How We May Use It
		our service, including through our websites and apps
Employment information	Your job title, place of work, hire date, employment history, work address	<ul style="list-style-type: none"> <li>To determine eligibility and process applications</li> <li>To administer the range of products and services that you have with us</li> </ul>
Financial information	Your banking information, email linked to your electronic transfers, and payment information	<ul style="list-style-type: none"> <li>For billing, administering claims and other financial and payment-related functions</li> <li>To administer the range of products and services that you have with us</li> </ul>
Transaction information	Details about payments to and from you, and other details of products and services you have purchased from us, including customer account numbers	<ul style="list-style-type: none"> <li>For administering services and auditing</li> <li>To understand how you use our products and services</li> </ul>
Health information	The state of your physical and/or mental health which we receive in connection with your use of our services, through connected devices or through any health risk assessment you complete	<ul style="list-style-type: none"> <li>To determine eligibility and process applications</li> <li>To administer the products and services that you have with us</li> <li>Note: For clients using absence and disability management services, TELUS Health or employee and family assistance programmes, the personal health information collected for the purpose of providing one service will not be used or disclosed for the purpose of providing any other service. Although some health information may be used by TELUS Health in data analytics, it will not be disclosed in a way that allows identification of any individual</li> </ul>

Personal Information Category	Types of Information We May Collect	How We May Use It
Biometric information	Your weight, height, body mass index, waist circumference, cholesterol, lipoprotein, triglycerides, glucose and blood pressure readings, sleep patterns or other similar information provided by you or collected by your devices or wearables	<ul style="list-style-type: none"> <li>To administer products and services that you have with us</li> </ul>
Lifestyle information	Your alcohol consumption, tobacco/nicotine use, eating and nutrition (e.g., number of servings of food groups and nutrition related questions), cardiovascular disease risk, emotional well-being (e.g., depression and stress), and readiness to change	<ul style="list-style-type: none"> <li>To determine eligibility and process applications</li> <li>To administer products and services that you have with us</li> </ul>
Claims information	Information disclosed to us with your permission by your insurance, health plan provider, or plan sponsor regarding claims you have made under your policy and/or other information, including health information	<ul style="list-style-type: none"> <li>To determine eligibility</li> <li>To administer the full range of products and services that you have with us</li> <li>To process and administer claims</li> <li>To provide you with personalised services</li> </ul>
Interaction information	Telephone recordings and transcripts, records of communications (emails, letters, online chat etc.)	<ul style="list-style-type: none"> <li>For quality assurance and staff training purposes</li> <li>To retain a record of your interactions with LifeWorks</li> <li>To provide you with the services and information which you request</li> <li>To communicate with you and respond to your inquiries</li> <li>To understand any concerns you may have, so that we can resolve disputes and improve your experience</li> </ul>

Personal Information Category	Types of Information We May Collect	How We May Use It
Digital interaction information	Geolocation data, IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system (including the type of device used) and other technology, related to the devices you use to access our websites and/or our apps	<ul style="list-style-type: none"> <li>To personalise your experience and understand how you use our sites and apps</li> <li>To notify you of any relevant issues relating to our website or app (e.g., push notifications)</li> <li>To measure how our apps and websites are performing</li> <li>To identify opportunities for new products/services or improvements to existing ones</li> <li>For system or product development and planning, audit and administrative purposes</li> <li>For more information relating to our use of cookies, Google Analytics, and related technology, please review our <a href="#">Cookie Policy</a></li> </ul>
Job Applicant Information	Résumé, cover letter, reference letters, employment history and interests	<ul style="list-style-type: none"> <li>For staffing and recruitment activities</li> <li>To maintain an inventory of candidates for current and future work opportunities</li> </ul>

We may also collect and use your information to:

- Perform services on your behalf or your employer's/benefits sponsor's behalf (including total health and wellbeing, rewards and recognition services, employee and family assistance services, health management programmes, group benefits and investment plans, and pension administration services);
- Understand your needs, the suitability of our products and services, and assess future needs;
- Provide services tailored to your requirements and to treat you in a more personal way;
- Promote and market our products and services to you;
- Improve our business operations and the quality of our products and services;
- Develop and test new products and services;

- Manage our business and operational needs;
- Administer and protect the security of our business, and our websites, apps and other services;
- Meet our legal and regulatory obligations, including to enforce our legal rights; and
- Carry out other purposes related to any of the above.

## De-identified, Aggregated, and Anonymised Information

We may use your personal information to generate de-identified, aggregated or anonymised information that does not reveal your identity. TELUS Health uses this information to conduct research, compile aggregate data sets, statistics and reports, and to perform analytics on our services, service standards, business operations, and trends.

We may share de-identified, aggregated or anonymised information with our clients for reporting purposes, including usage of our services, and with third party service providers for use in creating marketing materials, cases studies and statistical analyses. This allows TELUS Health, its clients and our respective thirdparty service providers to understand how we are performing, or develop relevant products, services or offers.

## When Does TELUS Health Share Your Personal Information?

TELUS Health may share your personal information with:

- Other TELUS Health entities in order to serve you, including for our internal management and administrative purposes.
- Third party service providers who are required to keep your information confidential and secure and are restricted from using or disclosing information for reasons other than performing services on our behalf or to complying with legal requirements.
- Third parties and partners in the event of a potential merger or acquisition, transfer of assets, reorganisation or bankruptcy. These parties are also required to keep your information confidential and secure and are restricted in their use of information to this purpose.
- Government, regulatory and law enforcement agencies to meet our compliance, regulatory, and risk management obligations or to comply with the law.
- The general public and other users when you post or share comments, blog postings, testimonials, or other similar information on our technology platforms
- Your sponsoring organisation or health plan provider when you provide your express or implied consent or if we are required to do so by law.

## International Transfers of Information

TELUS Health is a global organisation with affiliates, partners and subcontractors located in many countries around the world. To provide our services to you, TELUS Health may exchange personal information across geographical borders with TELUS Health entities, affiliates or service providers in other countries working on our behalf in accordance with applicable law.

Examples of countries we transfer and exchange personal information with include, but are not limited to, the United States of America, the United Kingdom, Canada and Australia.

## Storage of Your Information

TELUS Health may store your personal information in its databases located in the United States, Canada, the United Kingdom or other countries. Some of our service providers may also store or access personal information from countries other than where you reside or receive services, and in those circumstances, are subject to the laws of that jurisdiction. Because of this, there may be circumstances where other foreign governments, courts, law enforcement agencies or regulatory agencies are entitled to access the personal information collected and held by TELUS Health or our sub-contractors.

If you are visiting our website from a country other than Canada, your communication through our website or any of our services may result in the transfer of information across international boundaries. By using our website or any of our services, you consent to the collection, storage, and processing of your information in Canada and other countries (including the United States, the UK and Australia) in accordance with applicable data protection legislation.

## Retention of Your Information

We only keep your information as long as it is contractually, operationally or legally necessary. When we no longer need the information, it is either destroyed or de-identified.

## Safeguards

We use reasonable physical, technological, organisational and contractual safeguards, appropriate to the sensitivity of the information, to protect personal information in our possession or under our control, from unauthorised access, disclosure or use.

## Accessing Your Information

When requested in writing, we will inform you of the existence, use, and disclosure of your personal information that we maintain. We may not be able to provide you with all the information you request, depending on the circumstances, and there may be a charge for copies of your personal information.

## Correcting Your Information

We will make reasonable efforts to keep your information accurate and up-to-date. If a change or correction is required, let us know right away. We'll make appropriate updates needed to keep things running smoothly. You can review your personal information by looking at the correspondence we send to you, through your online accounts with us, or by requesting access to your personal information, as described above.

## Contact Information

If you have any questions or concerns about this policy or TELUS Health's handling of your personal information, or if you want to make a complaint, please communicate in writing with our Privacy Officer at:

By regular mail:  
Privacy Officer  
TELUS Health  
Level 25, 303 Collins Street  
Melbourne VIC 3000



By electronic mail:

[privacy-vieprivee@lifeworks.com](mailto:privacy-vieprivee@lifeworks.com)

Please note that we may need to confirm your identity, request additional details and work with other TELUS Health departments to respond to you or to look into your concerns or complaint.

#### Changes to Our Privacy Policy

We may modify this notice from time to time and will post the most current version online.

Last updated: March 2020

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## Cookie Policy

### What is a Cookie?

A cookie is a small data file that a website may place on your device. A cookie file can contain technical information (such as a user ID) that the website can use to track the pages you have visited and to record your preferences for future visits.

### Cookies We Use and Why We Use Them

TELUS Health (including its affiliated companies and subsidiaries) websites use cookies and related technologies to distinguish you from other users, to understand how you use our websites, to monitor and improve the performance of our websites, and to personalise your experience.

A number of cookies on TELUS Health websites last only for the duration of your web session and expire when you close your browser. Other cookies (known as “persistent cookies”) remain on your device because they are used to remember you when you return to the website.

### Third Party Cookies

In addition to the cookies that TELUS Health delivers to your device through our websites, third parties may also place cookies for a variety of reasons. For example, we use Google Analytics, a web analytics tool that helps us understand how visitors engage with our websites. To learn more about Google Analytics, [click here](#).

Other third parties may deliver cookies to your device for the purpose of understanding your online behaviours across non-affiliated websites and delivering targeted advertisements either on our websites or on other websites.

### Blocking Cookies

You can block cookies by adjusting your internet browser settings, although this may interfere with the functionality of LifeWorks websites. For more information on blocking cookies or targeted advertising, visit the [All About Cookies](#) page or check your browser’s instructions.

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## Do-Not-Track Mechanisms

Because of the rapidly changing state of technology, we cannot make any guarantees that our systems will be able to honour Do-Not-Track requests sent by your browser.

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TELUS Health  
Level 25, 303 Collins St  
Melbourne, Vic 3000.

By electronic mail:  
[privacy-vieprivee@lifeworks.com](mailto:privacy-vieprivee@lifeworks.com)

Please note that we may need to confirm your identity, request additional details and work with other TELUS Health departments to respond to you or to look into your concerns or complaint.

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## Mobile Applications Privacy Policy

TELUS Health collects, uses and shares information when you download, register with or use our mobile applications ("Apps"). For more detailed information on how TELUS Health processes your information, please review the TELUS Health's [Privacy Policy](#) and our [EU and UK Privacy Addendum](#).

## Information We Collect

TELUS Health may collect:

- Personal information, such as contact, employment or health information you provide to register and use our Apps; and
- Technical information, such as data about your usage of an App (e.g., crash logs), data about your device (device type, operating system etc.) and its interaction with an App, and device geolocation information.

## How We Use Your Information

TELUS Health may use information collected through our Apps to:

- Complete registrations, transactions or services requested through our Apps;
- Contact you in connection with services or inquiries requested through our Apps;
- Keep you posted on latest announcements and offerings;

- Personalise the content and features of our Apps;
- Review the quality of our Apps, and improve their functionality;
- Develop products and services, including new Apps and features;
- Create de-identified information for data analytics and other purposes;
- Generate and share anonymised analytics and industry benchmarking; and
- Comply with laws and regulations and lawful requests or orders.

As a global organisation, TELUS Health and our third-party service providers process and store personal information in various countries around the world. We only keep your information as long as it is contractually, operationally or legally necessary. When we no longer need the information, it is either destroyed or made anonymous.

## Your Choices

You may access, modify or delete your personal information by logging into our Apps using your username and password and visiting your account settings. You may opt-out of all future collection of information by TELUS Health by uninstalling our App from your mobile device.

- *Notifications and location data.* When you access our Apps, you may be asked whether you will allow us to access your location while you are not using the App and/or whether you would like to receive notifications on your device. If you click “allow”, you can later opt-out by updating the privacy settings on your device or in the App itself. If you block the use of location information, some parts of our Apps may not function properly.
- *Information on your device.* The ability to collect certain personal information is controlled by your device settings (e.g., access to contacts, photos). If you choose not to allow this access, some services may not operate effectively. Refer to the documentation for your device regarding how to allow or block the collection of certain device information.

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