

PRIVACY POLICY

Purpose

Purple Oak Consultants is committed to respecting personal privacy, safeguarding confidential information and ensuring the security of any personal health information handled in the course of providing consulting services and personal information it holds about its employees, consultants, sub-contractors and clients. The term “personal information” means information about an identifiable individual, including any confidential information about a **Purple Oak Consultants** employee, consultant, sub-contractor and client. Personal information does not include contract information, such as the name, title, business address or telephone number or an employee of an organization.

While many of **Purple Oak Consultants** clients are governed by various private, public and/or health sector specific privacy legislation, this Privacy Policy also recognizes and assumes responsibility for the protection of any “personal information” or “personal health information” (as these terms are defined in the applicable statute) provided to, or accessed by, **Purple Oak Consultants** for the sole purpose of providing contracted services to its clients. Such information is considered strictly confidential and may only be accessed on a need-to-know basis. All **Purple Oak Consultants** activities in relation to personal health information will adhere to the clients’ policies and procedures.

The purpose of the Privacy Policy is to establish privacy guidelines for **Purple Oak Consultants** when it accesses, modifies, transmits, retains or disposes of personal information or personal health information during the course of its business activities. To this end, this Privacy Policy fosters transparency, accountability and increased awareness of **Purple Oak Consultants**’ information practices.

Scope

This Privacy Policy applies to **Purple Oak Consultants** partners, principals, consultants, employees, students and any other individual (collectively ‘**Purple Oak Consultants**’) with access to personal information or personal health information. **Purple Oak Consultants** must comply with this Privacy Policy strictly at all times. This Privacy Policy shall be interpreted in accordance with applicable privacy statutes where **Purple Oak Consultants** accesses, holds or manages personal information as a result of providing services to its clients.

This Privacy Policy reflects internationally accepted fair information practices which form the basis for the legislative statutes and regulations in many countries around the world. The Privacy Policy will continue to evolve over time to reflect legislative changes and current best practices in privacy and data protection.

Practices for handling personal information in compliance with these principles are summarized below.

1.1 Principle 1 - Accountability for Personal Information

Purple Oak Consultants is responsible for protecting personal information and personal health information it accesses, holds or manages on behalf of or about its employees, consultants, sub-contractors and clients whether off site or on site. **Purple Oak Consultants** is also responsible for protecting personal information and personal health information that it transfers to its sub-contractors as a result of or in connection with providing services to its clients.

In the case of sub-contractors, **Purple Oak Consultants** will use contractual means to ensure a comparable level of data protection while a third party handles such information on its behalf. Such contracts shall include standard privacy clauses dealing with the confidentiality and security of personal information in accordance with applicable privacy legislation and this Privacy Policy, which are to form part of the Terms and Conditions of the contract.

Accountability for **Purple Oak Consultants**’ compliance with this Privacy Policy and relevant privacy legislation rests with the Principals of the practice. The Principals are responsible for ensuring compliance with this Privacy Policy and relevant legislation as well as receiving privacy complaints and managing privacy breaches. A breach of this Privacy Policy may result in suspending the user’s access rights to personal information and personal health information and disciplinary action, including suspension or dismissal. In the case of sub-contractors, a breach may result in termination of the sub-contract agreement.

1.2 Principle 2 - Identifying Purposes for Collecting Personal Information

Purple Oak Consultants collects personal information from its employees, consultants, sub-contractors and clients. **Purple Oak Consultants** collects personal information from its clients for the purpose of providing them with business services and products; it also collects personal information about its employees and sub-contractors for general contact and human resources purposes. From time to time **Purple Oak Consultants** may also access personal health information in the custody/control of its clients for the purpose of providing contracted services on behalf of its clients.

Upon request, **Purple Oak Consultants** shall inform its employees, sub-contractors and clients of the purpose for which it collects, uses or discloses personal information as well as the purpose for which it may need to access personal health information. Personal information is collected, wherever possible, directly from employees, consultants, clients or through referrals where an individual has requested that such information be provided to **Purple Oak Consultants**. **Purple Oak Consultants** may also collect personal information from third parties, including government agencies, who have the authority to disclose the information.

1.3 Principle 3 - Consent

Except where the law authorizes collection and use of personal information or personal health information on behalf of its clients without consent, prior to collecting and using such information, **Purple Oak Consultants** shall obtain consent of the individual who supplied the information or someone duly authorized to act on that individual's behalf. Such consent may be withdrawn at any time by contacting the Principals, subject to any legal or contractual restrictions and upon reasonable notice to **Purple Oak Consultants**. Where **Purple Oak Consultants** requires access to personal health information in the course of providing services to its clients, **Purple Oak Consultants** acknowledges that obtaining consent at the point of collection rests with the client and that additional consent is not required by **Purple Oak Consultants** for the sole purposes of assisting its clients with work on its behalf and for the purpose consented to by the individual, except as required by law.

1.4 Principle 4 - Limiting Collection

Purple Oak Consultants only collects personal information and/or accesses personal health information as required to fulfill the purposes identified in this Privacy Policy. **Purple Oak Consultants** does not collect personal health information.

1.5 Principle 5 - Limiting Use, Disclosure and Retention

Purple Oak Consultants shall not use or disclose personal information or personal health information in its custody or control, or to which it has access in the course of providing contract services, except as necessary in the course of providing the services. **Purple Oak Consultants** will only access, use, and disclose the minimum amount of personal information or personal health information necessary to fulfill the identified purpose.

For example, **Purple Oak Consultants** uses personal information to provide business services, for billing, record-keeping, account collection and other client contact and service matters, to manage and develop its business and operations. **Purple Oak Consultants** will never disclose personal information or personal health information to a third party without consent or unless it is required by law or as necessary to provide client services (e.g. to a sub-contractor) provided that adequate contractual measures are in place to protect the information in accordance with this Privacy Policy and applicable legislation.

Purple Oak Consultants shall retain personal information and personal health information no longer than necessary to provide its clients with contracted services. As such, **Purple Oak Consultants** takes security precautions when disposing and/or destroying such information. Specifically, upon completion of a contract, all personal information and personal health information it receives or accesses from its clients shall be returned or destroyed. If **Purple Oak Consultants** is required to destroy the information, it shall ensure that its employees, consultants, sub-contractors or personnel:

a) physically destroy all print and other hard copies by cross-shredding it;

b) erase, scrub or otherwise remove all electronic, digital or other versions of it from every item of equipment and all media (including disks, tapes, computers, servers, and related peripheral equipment such as disk arrays, tapes or disk backup units) that it has installed, downloaded, or otherwise put onto; or

c) otherwise obliterate it.

Purple Oak Consultants shall also ensure that any partners, principals, consultants, employees, students, sub-contractors or any other individual with access to personal information or personal health information who have been terminated or have resigned immediately return the information as well as any hardware belonging to **Purple Oak Consultants**. **Purple Oak Consultants** shall also ensure that pass cards are returned, usernames and passwords are revoked and changed to ensure no access to any applications, hardware, software, network and facilities belonging to **Purple Oak Consultants** and any client.

1.6 Principle 6 - Accuracy

Purple Oak Consultants shall ensure that all personal information it collects and holds is accurate, complete and up-to-date by routinely updating such information and/or making amendments upon request, where appropriate.

1.7 Principle 7 - Safeguards

Purple Oak Consultants takes reasonable efforts to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, modification or destruction by using appropriate physical, organizational and technological measures to respect the confidentiality of all personal and/or personal health information it holds or accesses. Methods of protection include but are not limited to:

- Physical Safeguards: locked filing cabinets, restricted access to offices;
- Organizational Safeguards: limited access to personal information on a need-to-know basis, employee privacy orientation and training, confidentiality pledges, random audits;
- Technical Safeguards: username and passwords, anti-virus protection and data backup.

1.8 Principle 8 - Openness about Policies and Practices

Purple Oak Consultants makes this Privacy Policy, including the name, title, and contact information of its Principals accountable for **Purple Oak Consultants'** Privacy Policy and to whom access requests, inquiries and complaints may be directed.

The Privacy Policy will be available at www.purpleoakconsultants.com.

Subject to applicable legislation, **Purple Oak Consultants** reserves the right to monitor any and all aspects of its information systems and infrastructures including, but not limited to: visited internet sites, instant messaging systems, chat groups, news groups and e-mail sent and/or received via **Purple Oak Consultants'** business email address.

Purple Oak Consultants will notify its clients at the first reasonable opportunity if personal information or personal health information handled by **Purple Oak Consultants** and/or its sub-contractors is stolen, lost or accessed by unauthorized persons.

1.9 Principle 9 - Individual Access

Purple Oak Consultants provides its employees, consultants, sub-contractors and clients with access to their personal information upon request so that they may know what information **Purple Oak Consultants** holds about them and to provide an opportunity to verify the accuracy of their information and to correct any inaccuracies.

Purple Oak Consultants reserves the right not to provide access where providing such access would compromise the personal security or commercial confidentiality of **Purple Oak Consultants** or its clients or where personal information is protected by professional confidentiality standards or solicitor-client privilege. **Purple Oak Consultants** does not provide access nor does it have the authority to provide patients with any access to the

personal health information it accesses on behalf of its clients during the course of providing its contracted services.

1.10 Principle 10 - Challenging Compliance

Any privacy-related questions, concerns or complaints should be made in writing to the designated Principals at privacy@purpleoakconsultants.com.

Purple Oak Consultants will inform its employees and clients who make inquiries or lodge complaints of relevant complaint procedures. **Purple Oak Consultants** will investigate all complaints and will take appropriate measures, including amending its Privacy Policy as necessary.

30 September 2009