

TheraPsil Coalition Privacy Policy

Effective date: March 13, 2020

1. PURPOSE AND SCOPE:

The purpose of this policy is to assert TheraPsil Coalition's ("TheraPsil" "we", "our" or "us") commitment to the protection of personal health information ("PHI") from unauthorized collection, access, use, or disclosure, and protection of PHI from theft or loss. This policy addresses the appropriate collection, use and disclosure of PHI, the individual's right to limit access to his/her record, and the secure disposal of PHI when it is no longer required.

- I. TheraPsil recognizes its obligation to respect privacy and is committed to maintaining the confidentiality of PHI, whether written, verbal, electronic, photographic or stored on any other medium.
- II. TheraPsil recognizes its obligation to ensure and facilitate timely access to information as required by authorized individuals for direct patient care, administrative use, or where required to do so by law.
- III. To assist with meeting our privacy obligations, TheraPsil has designated a contact person, the Corporate Privacy Officer, who is accountable for the Hospital's compliance with its own policies and applicable privacy legislation.
- IV. It is the legal, professional and ethical duty of all persons affiliated with TheraPsil to keep private the information they receive from and about patients. This duty arises from the recognition that capable patients have the right to control the collection, use and disclosure of their PHI, including the right to determine the time and manner in which the disclosure of such information may occur to third parties, including care providers, family members, friends and others.
- V. Accordingly, it is the obligation of all of those who collect, receive and share confidential information concerning users of TheraPsil's services to exercise the utmost vigilance in the protection of user privacy.

"personal health information" ("PHI") is identifying information about an individual in oral or recorded form, if the information:

- relates to the physical or mental health of the individual, including the individual's medical history and the individual's family history;
- relates to the providing of health care to the individual, including the identification of a person as a provider of health care to the individual;
- relates to payment or eligibility for health care;
- is the individual's health number; or
- identifies an individual's substitute decision-maker.

Any other information about an individual that is included in a record containing PHI is also part of this definition. It is not necessary for the individual to be actually named for the information to be considered PHI.

2. OUR COMMITMENT TO PRIVACY

This policy outlines how TheraPsil Coalition (“TheraPsil” “we”, “our” or “us”) protects the personal information we collect about you, including information about your physical and mental health. We value your privacy and are committed to being accountable for how we treat your personal information. All employees, affiliates at partners working with TheraPsil are required to adhere to the protections described in this policy.

TheraPsil Coalition recognizes its obligation to respect privacy and is committed to maintaining the confidentiality of your Personal Health Information. This policy was developed in compliance with the British Columbia *Personal Information Protection Act* (PIPA). PIPA sets out rules for how organizations such as our office can collect, use, disclose, store and retain your personal information.

In this privacy policy, we explain how we collect, use and disclose your personal information that we obtain when you use our services, visit or use our websites, or otherwise interact with us, and the steps we take to protect your Personal Information. The purpose of this privacy policy (the “Policy”) is to inform you of our privacy practices including:

- how and why we collect your Personal Information;
- how we intend to use your Personal Information;
- how to obtain access or request correction of your Personal Information;
- with which parties we may share your Personal Information;
- and to provide you with contact information should you have questions or concerns about our practices.

To assist with meeting our privacy obligations, TheraPsil Coalition has designated a contact person, the Corporate Privacy Officer, who is accountable for TheraPsil Coalition’s compliance with applicable privacy legislation.

Privacy Principles

The Canadian Standards Association has developed 10 Privacy Principles that underpin Canadian privacy legislation. These form the basis of our Privacy Policy and how TheraPsil collects, uses, discloses and safeguards the personal information (including personal health information) we hold about you.

- 1. Accountability:** TheraPsil is responsible for the collection, use and disclosure of personal health information in our custody or control. Our privacy contact person is accountable for compliance with our Privacy Policy and can be reached by email info@lloydlawcorporation.ca or telephone at 604 852 5110.
- 2. Identifying purposes for collecting personal information:** We will identify the purposes for which personal information is collected at or before the time the information is collected.
- 3. Consent for collection, use, and disclosure of personal information:** Your knowledge and consent (or of a person authorized to consent on your behalf) is required for the collection, use or disclosure of personal health information, except where otherwise permitted or required by law
- 4. Limiting collection of personal information:** We will limit the collection of personal information to that which is necessary for the authorized purposes identified. Information will be collected by fair and lawful means.
- 5. Limiting use, disclosure, and retention of personal information:** Personal information will not be used or disclosed for purposes other than those for which it was collected. Personal information will be retained only as long as necessary to fulfil those purposes.
- 6. Accuracy of personal information:** Personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
- 7. Ensuring safeguards for personal information:** Personal information will be protected by security safeguards appropriate to the nature and format of the information being stored
- 8. Openness about privacy policy:** We will provide you with specific information about our policies and practices relating to how we manage your personal information.
- 9. Individual access to personal information** Upon written request by you or your substitute decision-maker, we will inform you of the existence, use and disclosure of your personal information and will give you access to that information, with limited exceptions. You may challenge the accuracy and completeness of the information and may request to have it amended.
- 10. Challenging compliance with the privacy policy** You may address a challenge or complaint concerning compliance with the above principles to our Privacy Officer at [privacy officer email] or to the relevant regulatory oversight body. For details on the various relevant privacy authorities, see section 19 of this policy.

3. WHO WE ARE

TheraPsil is a coalition of healthcare professionals dedicated to providing legal access to psychedelic-assisted psychotherapy for Canadians. We are a group of credentialed and experienced psychotherapists and medical professionals who are dedicated to making psilocybin-assisted psychotherapy available to Canadians suffering from end-of-life distress. We have all completed formal clinical training in psychedelic psychotherapy in 2016. Further details are available at: <https://thera-psil.ca/>

BY USING OUR WEBSITE, YOU CONSENT TO THE COLLECTION, STORAGE, USE, DISCLOSURE AND RETENTION OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THIS POLICY. IF YOU DO NOT AGREE WITH THIS POLICY, YOU SHOULD NOT ACCESS OR USE OUR WEBSITE.

Overview of Our Privacy Practices

Our privacy practices are summarized here. Under this Policy, TheraPsil Coalition:

- (1) collects Personal Information when you access or provide information through our Website, provide information to our participating practitioners, or make inquiries with us;
- (2) may collect non-identifiable information regarding users, including the date and time users access our Website, Internet protocol (IP) address, cookies and web beacons;
- (3) share this information with our authorized employees, agents, service providers and legal representatives, and may also share this information with third parties engaged to provide products and services on our behalf (“Third Parties”). When connecting to a Third-party portal within our website, such use is governed and controlled by the terms and conditions for those Third Parties. TheraPsil does not control the terms of Third-Party web sites. We may, however, share your Personal Information with these Third Parties in order to fulfil the services you have requested through the use of our Website;
- (4) will not share your Personal Information with Third Parties without your consent, except as set out in (3), unless you have (i) authorized us to do so; (ii) as required by law; or (iii) as disclosed to you when the Personal Information is collected;
- (5) may collect and use your Personal Information to comply with applicable laws and regulations, to administer our Website, to protect you and us from fraud or other illegal activities, to contact you regarding your inquiries, and to communicate with you (provided you have opted to receive such information);
- (6) allows you to withdraw your consent to the collection, storage, use, disclosure and retention of your Personal Information at any time by contacting us info@lloydlawcorporation.ca and
- (7) will mitigate the risk and impact of potential harms involved in the disclosure of Personal Information through the adoption of reasonable physical, technical and organizational procedures appropriate to the sensitivity of the data in an effort to safeguard the Personal Information you provide to us.

Even with physical, technical and organizational measures adopted by TheraPsil to safeguard your Personal Information, there is a residual risk of the loss of, unauthorized access to or unauthorized disclosure of your information which could result in financial or other harm to you.

Further information with respect to our privacy practices is set out below.

4. WHAT INFORMATION DO WE COLLECT?

We collect only the information that is required to fulfil the purposes of supporting you in your application to the Minister of Health for psilocybin-assisted psychotherapy. We do not collect any other information, or allow information to be used for other purposes, without your express (i.e., verbal, written or electronic) consent - except where authorized to do so by law. We maintain information relating to the visitors of our Website and the information they provide. Only Personal Information that is reasonably necessary is collected. The information we collect comes directly from you (or your legal representative), our service providers, or as a result of a referral from TheraPsil Coalition partners.

Personal information refers to factual or subjective information, recorded or not, about an identifiable individual. We may collect the following categories of Personal Information:

- Identification information and contact information including individual name, email address, telephone.
- Personal Health Information. Personal Health Information is identifying information about an individual which relates to the physical or mental health of the individual, including the individual's medical history and the individual's family history; relates to the providing of health care to the individual, including the identification of a person as a provider of health care to the individual; relates to payment or eligibility for health care; is the individual's health number; or identifies an individual's substitute decision-maker.

The personal information we collect comes from the following sources:

Source	Personal Information Categories Collected
<p>Information You Provide on the TheraPsil Website</p>	<p>When you provide your contact details within our Website, on the “Get in Touch” with us page, we collect the information you provide in the web-form.</p> <p>The specific categories of personal information we collect about you are:</p> <ul style="list-style-type: none"> • Your Name (First Name, Last Name); • Your Email Address; • Any information you provide in the text box, including questions, comments or feedback; and • An inference affirming that you meet the following four (4) listed requirements to be supported by TheraPsil in an application to the Minister of Health: <ol style="list-style-type: none"> 1. You are Canadian, 19+ years of age, and a BC resident. You’re interested in trying psilocybin as medicine, have identified a potential supply and are seeking legal protection and a supervised treatment program. 2. You have cancer and have received a palliative diagnosis. 3. As a result of your diagnosis, you experience end-of-life psychological distress (anxiety/depression/demoralization). 4. Your emotional distress has not successfully responded to other treatments.
<p>Information Automatically Collected From Visitors of TheraPsil’s Website</p>	<p>Our Website may automatically collect certain information regarding our Website users, such as the date and time you access the Website, the IP address assigned to you by your Internet service provider, the Internet address of the website from which you linked directly to the Website, the operating system and browser you are using, the features of the Website you use, the content and information accessed, and the materials you post to or download from the Website. We may collect, use, transfer and disclose aggregated and/or non-Personal Information.</p>

5. OUR USE OF COOKIES

Our Website uses "cookies", a technology that installs information on your device to permit websites to recognize future visits using that device. Cookies enhance the convenience and use of websites. For example, if you leave a comment on our Website, you may opt-in to saving your name, e-mail address and website in cookies. This is provided for your convenience so that you do not have to provide your details again when you leave another comment. These cookies will last for one year.

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in to your User Account, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your User Account, the login cookies will be removed.

If you edit or publish an article on our Website, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after one day.

You may choose to decline cookies if your browser permits but doing so may affect your use of the Website and your ability to access certain features of the Website.

6. OUR USE OF WEB BEACONS

We may also include web beacons in the e-mails that we send to you. Web beacons allow us to collect information about when e-mail recipients open the emails we send, what parts of the e-mail they review, their IP address, browser and other similar details. Some of this information may be correlated with recipients' e-mail addresses. We use this information to review how recipients are responding to the e-mails we send.

7. PURPOSE OF COLLECTION AND USE OF YOUR PERSONAL INFORMATION

TheraPsil Coalition collects and uses the Personal Information that you supply to us or that is collected through your use of our Website or from the emails we send for the following purposes:

- To administer our Website and to manage the e-mails that we send;
- To contact you in connection with services you have requested and your inquiries;
- To support you in your application to the Federal Minister of Health, or other relevant government bodies;
- To provide psilocybin-assisted psychotherapy, or other relevant services;
- To protect us and those visiting our Website against fraud;
- To notify you in connection with any changes to our services or this Policy;
- As permitted by, and to comply with, applicable laws and regulations; and

- If you opted in to allow us to do so, to communicate with you about us or the services we offer.

We may share your Personal Information we collect for the above purposes with our authorized employees, agents, service providers and legal representatives, and may also share this information with third parties engaged to provide products and services on our behalf. Such persons may only use your Personal Information for the purposes for which such information may be used by us under this Policy as identified above.

8. DISCLOSURE OF PERSONAL INFORMATION

We will keep Personal Information that you provide to us private and will disclose such Personal Information only in accordance with this Policy. TheraPsil Coalition does not sell, rent, or lease to third parties any Personal Information we collect from you. We may disclose or share Personal Information with our authorized employees, agents, legal representatives and service providers for the purposes described in this Policy. Please note that third party providers may change from time to time. We also share your Personal Information with service providers who assist with administering, hosting and supporting our Website. These service providers may be located outside of Canada and data in transit may pass through other Countries (see 'Storage and Location of Information' section below).

We will not otherwise share your Personal Information with third parties without your consent, unless authorized or required by law or as disclosed to you when the information is collected. We may disclose your Personal Information to a government institution or agency that has asserted its lawful authority to obtain the information or where we have reasonable grounds to believe the information could be useful in the investigation of unlawful activity, or to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with court rules regarding the production of records and information, or to protect our rights and property.

9. HOW WE SECURE YOUR PRIVACY

Safeguards are in place to protect the security of your information. We keep the Personal Information we collect about you confidential and have adopted reasonable physical, technical and organizational procedures appropriate to the sensitivity of the data to safeguard the Personal Information you provide to us. These safeguards are aimed at protecting personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Notwithstanding these measures, no collection, storage or transmission of information over the Internet on websites or otherwise can be guaranteed to be 100% secure, and therefore we cannot ensure, warrant or guarantee the security of any such information. As a result, we cannot warrant the security of any information you transmit to us, and you do so at your own risk.

10. RETENTION OF PERSONAL INFORMATION

In accordance with our data retention schedule and, we will keep and retain your Personal Information in compliance with our legal obligations, and only as long as necessary for the purposes for which it was collected. We will ensure that your records are disposed of in a secure and privacy protective manner.

11. STORAGE AND LOCATION OF PERSONAL INFORMATION

We may store, process or allow access to your Personal Information collected through the Website on our servers located in Canada, from time to time, in other locations outside Canada that we deem necessary or convenient in order to provide you with efficient and effective service. Personal Information you send to us or that is collected from you may also cross jurisdictional borders while in transit. As such, foreign governments, courts, law enforcement or regulatory agencies, including national security agencies, may be able to access your Personal Information under foreign laws

12. PROVIDING AND WITHDRAWING YOUR CONSENT

By choosing to provide your personal information on our website, you consent to the collection, use, storage and disclosure of Personal Information for the purposes identified within this Policy (i.e. for the purposes of seeking TheraPsil's support in your application to the Minister of Health, and for psilocybin-assisted psychotherapy). We will not collect, use, or disclose your Personal Information in the course of any other activities, including commercial activities, without your consent.

You may withdraw your consent to the collection, storage, use, disclosure and retention of Personal Information about you at any time. To do this, please contact us at info@lloydlawcorporation.ca. Withdrawal of your consent to the collection, storage, use, disclosure and retention of Personal Information may result in us being unable to contact you or you being unable to continue use of our Website or services.

13. VERIFYING AND AMENDING YOUR PERSONAL INFORMATION

Subject to certain exceptions prescribed by law, you will be given reasonable access to your Personal Information held by us and you may request that your Personal Information be corrected or updated. You can also request that we erase any Personal Information we hold about you, except for any information we are obligated to retain for regulatory, legal or security purposes. Please email our Privacy Officer at: info@lloydlawcorporation.ca and we will assist you. It is your responsibility to notify us of any changes to your Personal Information, including contact information, so we can contact you and inform you about updates to this Policy and any other relevant information with respect to your use of our Website or services.

14. THIRD PARTY HYPERLINKS

Our Website contains hyperlinks to the websites of third parties. We are not responsible for the privacy practices or the content of such other websites. Linked websites are maintained by third parties. Such links are provided for your convenience and reference only. TheraPsil Coalition does not operate or control, in any respect, any information, software, products or services available on such third party websites. The inclusion of a link to such website does not imply any endorsement of the services or the site, its contents, or its sponsoring organization. We strongly advise you to review the privacy policy of every website you visit.

15. EMBEDDED CONTENT FROM OTHER WEBSITES

Articles on our Website may include embedded content, such as videos, images, articles, etc. Embedded content from other websites behaves in the exact same way as if you have visited the other websites. These websites, operated by third parties, may collect information about you, use cookies, embed additional third party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. We are not responsible for the privacy practices or the content of such websites. We strongly advise you to review the privacy policies of the websites from which the embedded content originates.

16. POLICY CHANGES AND UPDATES

We may revise this policy from time to time. We may choose to notify you of a change to this policy by announcing the change on our website. It is your responsibility to review our Website to ensure you are up to date on any changes that may affect you. Your continued use of the Website constitutes your consent to the contents of any updated policy.

17. PRIVACY CONCERNS

If you would like more information about this Policy or the Personal Information and our collection, storage, use, disclosure and retention policies and practices, please contact us by e-mail at: info@lloydlawcorporation.ca or by mail at:

Attention Privacy Office:
Lloyd Law Professional Corporation
Danielle Lukiv
2459 Pauline Street
Abbotsford, British Columbia
V2S 3S1
Tel. 604-852-5110

You may submit a complaint and/or other feedback (including inquiries, compliments and suggestions) related to our:

- privacy and data protection practices;
- information management practices;
- non-compliance with TheraPsil's policies, or statutory or regulatory requirements; or
- any other privacy related concern you may have.

Please let us know your questions or concerns and we will do our best to assist you.

18. COMPLAINTS TO OVERSIGHT AUTHORITIES

You may choose to file a complaint with the relevant oversight authority. Each province and territory in Canada has a commissioner or ombudsperson responsible for overseeing provincial and territorial privacy legislation.

Visit the Office of the Privacy Commissioner of Canada Website [here](#), for a full list of the provincial and territorial privacy laws as well as who is responsible for their enforcement. You may also choose to contact the Office of the Privacy Commissioner of Canada directly, to report your concern.

Office of the Privacy Commissioner of Canada

30 Victoria Street
Gatineau, Quebec
K1A1H3

Toll-free: 1800-282-1376
Phone: (819) 993-5444
TTY: (819) 994-6591

Website: <https://www.priv.gc.ca/en/>

Province	Regulatory Authority
Ontario	Office of the Information and Privacy Commissioner of Ontario (IPC) Phone: Toll-free: 1-800-387-0073 Toronto: 416-326-3333 Fax: 416-325-9195 TTY:416-325-7539 Email: info@ipc.on.ca Mailing Address: Information and Privacy Commissioner/Ontario 2 Bloor St. E., Suite 1400 Toronto, ON M4W 1A8 Website: www.ipc.on.ca
British Columbia	Office of the Information & Privacy Commissioner for British Columbia Phone: Toll-free: 1-800-663-7867

	<p>Victoria: 250-387-5629 Vancouver: 604-660-2421</p> <p>Fax: 250-387-1696</p> <p>Email:info@oipc.bc.ca</p> <p>Mailing Address: Office of the Information & Privacy Commissioner for British Columbia P.O. Box 9038, Stn. Prov. Govt. Victoria, BC V8W 9A4</p> <p>Website:www.oipc.bc.ca</p>
	<p>Visit the Office of the Privacy Commissioner of Canada Website here, for a full list of the provincial and territorial privacy laws as well as who is responsible for their enforcement.</p>