



PRACTICE SOLUTIONS PRIVACY POLICY
PROTECTING YOUR PRIVACY – OUR ONGOING COMMITMENT
effective March 31, 2009

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1. COMMITMENT TO PRIVACY

Protecting your personal information is fundamental to the way we do business with you. This Privacy Policy describes our current information management practices and confirms our commitment to comply with the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”), and any applicable provincial/territorial legislation, to meet your specific needs and expectations as one of our clients. This Policy is consistent with and is a subset of, the CMA Holdings Privacy Code.

2. SCOPE

This Policy applies to Practice Solutions Software Inc. and governs the management of all personal information that has been and will be collected, used and disclosed by Practice Solutions Software Inc.

In addition to this Policy, we also make available Privacy Statements that provide further detail about our information handling practices with respect to specific products and services that we offer, as well as websites that we own and operate. All our privacy documentation can be found on our website www.practicesolutions.ca (see footer “Privacy”)

Depending on the product or service involved, we may be engaged as a service provider and in that capacity we may collect, use and disclose personal health information. Please refer to the privacy statement for the specific product or service for further details on our information handling practices with respect to personal health information.

3. WHAT IS “PERSONAL INFORMATION”?

“Personal information” is information that refers to you specifically and that reveals a distinctive trait or traits about you that may help others identify you; for example, your date of birth or social insurance number. This definition does not encompass personal information available in the public domain; for example, your business address normally found in public documents such as telephone or professional directories.

“Personal health information” means diagnostic, treatment and care information relating to a specific individual and any other information about an individual that would fall within the definition of personal health information as found in provincial health sector privacy legislation. Personal Health Information is a subset of Personal Information.

4. HOW WE COLLECT YOUR PERSONAL INFORMATION

We only collect your personal information with your consent. Depending on the situation and the sensitivity of the information, you give us consent in different ways. Your consent is express when you actively say yes, such as when you sign a form permitting the collection. Implied consent is usually inferred by the use of a product or service, such as when you use our websites.

From You – on forms

Most of the information we collect about you is provided to us directly from you. The most common way we have of gathering information about you is when you fill in forms to attend an event that we offer or sign an agreement to access a particular product or service.

From You – over the phone

When you call us we will gather the information needed to process your request. For example, you may contact the Practice Solutions Hotline with a general inquiry, or you may contact a customer support line for assistance with a particular product or service. In certain circumstances, we may record calls. You will be notified prior to connecting with a representative if the call will be recorded. If you do not wish to have your call recorded you can transact business by mail or through one of our electronic channels.

From You – electronically

When you deal with us in an online environment we collect certain information, such as your log-in information. For more information about how we deal with you information online please see the Online Privacy Statement available on all of our websites.

From the CMA

Because many of our services are considered member benefits, if you are a physician, medical student or resident, we receive some personal information from



our parent organization, the Canadian Medical Association, such as your CMA membership status and medical specialty.

From our corporate affiliates

Parts of our infrastructure are shared between corporate affiliates including certain individuals, physical office space and electronic systems. This results in information being shared. For example your name and business address may be shared between Practice Solutions Software Inc., CMA Holdings and the companies within MD Financial.¹

5. WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information to provide you with the products and services you request – for example, when you register to attend an educational seminar, subscribe to a publication, licence our software products, become a billing client, have a product support request, or submit a credit application to finance your software purchases. Providing us with your personal information is always your choice. When you request products and services, we will only ask you to provide the personal information that enables us to complete your request or to provide you with better service.

The personal information we may ask you to provide depends on the nature of your request. Personal information that is essential for us to fulfill your product and service requests typically includes your full name, residential mailing address, e-mail address, phone number(s), and financial information (such as credit card or bank account information). If you are a CMA member client we may also request your CMA membership number.

We may request additional personal information to help us provide you with information about other products and services we believe would interest you. For example collecting information about your practice setting helps us determine which products and services may be of use to you.

To help us better understand our clients, we may gather information for analytical purposes by conducting anonymous client surveys and by extracting demographic information from existing files.

The choice to provide us with your personal information is always yours. However, your decision not to provide the personal information we request may limit the services we are able to provide you and make it more difficult for us to advise you. If we are unable to accommodate your request for services based on the personal information you provide, we may ask for additional details in order to identify other ways to be of assistance. Where personal information is not provided, this may prevent us from fulfilling our commitment to you and, in certain circumstances, we may not be able to provide you with a particular product or service.

¹ As of the date of publication the corporate affiliates within MD Financial are MD Management Limited, MD Funds Management Inc., MD Private Trust Company, MD Private Investment Management Inc., MD Private Investment Management US Inc., MD Life Insurance Company and MD Insurance Agency Limited. CMA Holdings Incorporated is the parent company of MD Financial.

6. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information to activate contractual relationships, process payment for goods and services, respond to support desk calls, notify you about upcoming events, authenticate your identity (for some web applications) and generally to communicate with you and effectively provide the products and services you request.

We only use your personal information for the purposes that we have disclosed to you. If for any reason your personal information is required to fulfill a different purpose, we will notify you and ask you for your consent before we proceed.

7. WHEN PERSONAL INFORMATION MAY BE DISCLOSED TO OUTSIDE PARTIES

We do not sell, lease, or trade client lists or personal information to others. However, we may release your personal information to parties outside Practice Solutions Software Inc. in certain circumstances, which include:

...When authorized by you

We may share your personal information as described in this Policy and when you specifically request it.

...When required by law

We must disclose information for regulatory purposes, in response to a search warrant, or other legally valid inquiry or order. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities making the request have legitimate grounds to do so.

...To third party service providers

We may contract with third party service providers to perform specialized services for us. When we contract with a service provider, they are given only the information necessary to fulfill their contractual obligations. In all outsourcing arrangements we ensure that the third party service provider provides assurances of confidentiality and has measures in place to protect your personal information with security safeguards appropriate to its sensitivity.

In certain instances we may contract with a third party service provider located in the United States. Your information may be processed and stored in the United States and the United States governments, courts or law enforcement or regulatory agencies may be able to obtain disclosure of your information under a lawful order made in that country.

...To the Canadian Medical Association (CMA)



If you are a CMA member, we may update the personal information you have already provided to the CMA, our parent company, to ensure your records with them are as accurate as possible. For instance, should you change your email address with Practice Solutions Software Inc., the email address you gave the CMA may also change.

...To our corporate affiliates

Your information may be shared among Practice Solutions Software Inc., CMA Holdings and the companies within MD Financial as noted above in the "How we collect" section of the Policy. You may receive information about other products and services we offer, which we believe would interest you. If you would prefer not to receive these please refer to the Our "Opt-Out" Policy section of this Policy.

8. HOW WE SAFEGUARD YOUR PERSONAL INFORMATION

Technical, physical and administrative solutions are in place to ensure your information is protected. Some examples are noted below.

We maintain technical safeguards such as data encryption and two-factor authentication on desktop and laptop computers to ensure that your personal information is protected against unauthorized access, disclosure and inappropriate alteration or misuse.

Physical safeguards include storage of paper-based files in locked file rooms and cabinets to which access is restricted. Paper files are securely shredded when no longer needed. Access to computer servers is similarly restricted.

Administratively, our Privacy Policies form a part of our Code of Conduct. Each employee is required to annually state their continued awareness of our Code of Conduct and their agreement to abide by it. Unauthorized access to and/or disclosure of clients' personal information by an employee is strictly prohibited. All employees are expected to maintain the confidentiality of client information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal. Additionally, all Practice Solutions Software Inc. employees are required to sign the Personal Health Information Privacy Acknowledgement to ensure that they understand their obligations with respect to personal health information.

We retain your personal information only as long as it is required for the reasons it was collected or as required by law. The length of time we retain the information varies depending on the product or service and the nature of the personal information.

9. ACCESSING YOUR PERSONAL INFORMATION

You have the right to access and verify any of your personal information whenever you wish. Please submit a request in writing to the Chief Privacy Officer as noted in the "Addressing Your Concerns" section of this Policy. We will advise you in advance if there will be a cost, for example, for requests that require archival or other retrieval costs. We will respond to your request within thirty days.

If we are unable to provide access to certain information, we will inform you of the reasons for the decision if we are permitted to do so by law. If you wish further clarification, you may contact our Chief Privacy Officer.

10. KEEPING YOUR PERSONAL INFORMATION ACCURATE

Having accurate information about you enables us to give you the best possible service and minimize the possibility that inaccurate information is used to make a decision which impacts you. To help us keep your personal information up-to-date, we encourage you to amend inaccuracies and make corrections as often as you like.

Should you identify any incorrect or out-of-date personal information, we will make the appropriate change in accordance with your instructions. Where appropriate, including where required by law, we will communicate these changes to other parties who may have incorrect information about you.

If we are unable to change your personal information and you disagree with our decision we will note your opinion in your account file.

11. OUR "OPT-OUT" POLICY

We value your relationship and believe how you deal with us is your choice. By sharing your information as described in this Policy, we can provide you with a broad selection of products and services.

In most cases you may refuse or withdraw your consent at any time. Please refer to the "Addressing Your Concerns" section of this Policy for a list of contacts. We will be pleased to explain your options and any consequences of refusing or withdrawing your consent, and record your choices.

Should you choose not to permit us to share your personal information between Practice Solutions Software Inc., the MD Financial companies or with the CMA, we may not be able to provide you with a particular product or service.

12. ADDRESSING YOUR CONCERNS

You may direct any questions or inquiries you have with respect to this Policy by contacting:

1. our Chief Privacy Officer at privacy-cmaholdings@cma.ca or confidentialiteholdingsamc@cma.ca or 1870 Alta Vista Dr., Ottawa, ON, K1G 6R7,

2. our Legal Counsel, Practice Solutions, 1870 Alta Vista Drive, Ottawa, ON K1B 3A7, 1 800 267-4022 x. 2203
3. the Practice Solutions Hotline at 1 800 361-9151

For more information about your personal privacy rights, you might contact the Privacy Commissioner of Canada at the web site <http://www.privcom.gc.ca>. or the Privacy Commissioner in your province or territory.