

# BEDFORD MEDICAL ALERT - PRIVACY POLICY

EFFECTIVE DATE: February 2022

UPDATED: February 2022

The Bedford Medical Alert Remotecare 24/7 App is operated by Bedford Security Systems Inc. operating as Bedford Medical Alert. ("Bedford", "Bedford Medical Alert", "We", "Us", "Our") and governs how we use and collect our users' ("You" or "Your") personal data.

Bedford Medical Alert values Your privacy and is committed to keeping Your Personal Data confidential. We use Your data solely in the context of helping you track an individual's health and wellness by offering a convenient mobile application and website with tools that allow you to do so.

THIS PRIVACY POLICY APPLIES TO PERSONAL DATA BEDFORD MEDICAL ALERT COLLECTS FROM USERS OF THE APP AND WEBSITE (THE "APPLICATIONS"). **"PERSONAL DATA" INCLUDES ANY INFORMATION THAT CAN BE USED ON ITS OWN OR IN COMBINATION WITH OTHER INFORMATION TO IDENTIFY OR CONTACT ONE OF OUR USERS.**

We believe that transparency about the use of Your Personal Data is of utmost importance. In this privacy policy, We provide you detailed information about Our collection, use, maintenance, and disclosure of Your Personal Data. The policy explains what kind of information We collect, when and how We might use that information, how We protect the information, and Your rights regarding Your Personal Data.

Please read the following carefully to understand Our views and practices regarding Your Personal Data and how We will treat it. For the purposes of applicable Data Protection Laws including the, the data controller is:

Bedford Medical Alert  
2 Bloor St. W., Suite 700  
Toronto, ON  
M4W 3E2

**BY SUBMITTING YOUR PERSONAL DATA THROUGH THIS APPLICATION, YOU ARE ACKNOWLEDGING THAT YOU HAVE READ AND AGREE TO THE TERMS OF THIS POLICY.** IF YOU DO NOT AGREE, PLEASE DO NOT LOG INTO OR ACCESS THE APPLICATIONS AND DO NOT SUBMIT ANY PERSONAL DATA TO US.

**PLEASE NOTE: WE OCCASIONALLY UPDATE THIS PRIVACY POLICY AND IT IS YOUR RESPONSIBILITY TO STAY UP TO DATE WITH ANY AMENDED VERSIONS. IF WE MODIFY THE PRIVACY POLICY, WE WILL POST A**

LINK TO THE MODIFIED TERMS VIA BEDFORD MEDICAL ALERT WEBSITE,  
[WWW.BEDFORDMEDICALALERT.CA](http://WWW.BEDFORDMEDICALALERT.CA).

WE MAY ALSO NOTIFY YOU VIA EMAIL. YOU CAN STORE THIS POLICY AND/OR ANY AMENDED VERSION(S) DIGITALLY, PRINT IT, OR SAVE IT IN ANY OTHER WAY. ANY CHANGES TO THIS PRIVACY POLICY WILL BE EFFECTIVE IMMEDIATELY UPON PROVIDING NOTICE, AND SHALL APPLY TO ALL INFORMATION WE MAINTAIN, USE, AND DISCLOSE. IF YOU CONTINUE TO USE THE APPLICATION FOLLOWING SUCH NOTICE, YOU ARE AGREEING TO THOSE CHANGES.

CAPITALIZED TERMS, IF NOT DEFINED IN THIS PRIVACY POLICY, ARE DEFINED IN THE TERMS OF USE, WHICH IS ACCESSIBLE AT [WWW.BEDFORDMEDICALALERT.CA](http://WWW.BEDFORDMEDICALALERT.CA).

In case you have any questions or concerns after reading this Privacy Policy, please do not hesitate to contact Us at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca). We appreciate Your feedback.

## **RESPONSIBLE ENTITY**

### Section 1

Bedford Medical Alert (“We”, “Us”, “the Company”) is the controller of Your Personal Data and may process this data in accordance with the Privacy Policy. You can contact Us with any questions about Our Privacy Policy at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca).

Our Applications may contain links to websites and services that are owned or operated by third parties (each, a “Third-party Service”). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner’s or operator’s privacy policy. We are not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect Your information, We recommend that you carefully review the privacy policies of all Third-party Services that you access.

## **WHAT INFORMATION DO WE COLLECT?**

### Section 2

We collect “PERSONAL DATA”, which includes any information that can be used on its own or with other information in combination to identify or contact one of Our users. The types of Personal Data We collect are described below.

#### Contact Information

We collect Your contact information, such as Your name and email address. Primarily, the collection of Your Personal Data assists Us in creating Your “User Account,” which You can use to securely track an individual’s health.

### Support Data

If You contact Bedford Medical Alert for support or to lodge a complaint, We may collect technical or other information from you through log files and other technologies, some of which may qualify as Personal Data. (e.g., IP address). Such information will be used for the purposes of troubleshooting, customer support, software updates, and improvement of the Application and related services in accordance with this Privacy Policy. Calls with Bedford Medical Alert may be recorded or monitored for training, quality assurance, customer service, and reference purposes.

### Device, Telephone, and ISP Data

We may use common information-gathering tools, such as log files and similar technologies to automatically collect information (which may include Personal Data) from Your computer or mobile device as you navigate Our Applications. The information We collect may include Your Internet Protocol (IP) address (or proxy server), device and application identification numbers, location, browser type, Internet service provider and/or mobile carrier, the pages and files you viewed, Your searches, Your operating system and system configuration information, and date/time stamps associated with Your usage. This information is used to analyze overall trends, to help Us provide and improve Our Applications and to guarantee their security and continued proper functioning.

## **HOW WILL WE USE YOUR PERSONAL DATA?**

### Section 3

We process Your Personal Data for purposes based on legitimate business interests, meeting Our contractual obligations to You, complying with Our legal obligations, and/or Your consent. We only use or disclose Your Personal Data when it is legally mandated or where it is necessary to fulfill the purposes described herein. Where required by law, We will ask for Your prior consent before doing so.

Specifically, We process Your Personal Data for the following legitimate business purposes:

- To fulfill Our obligations to You under the Terms of Use or another applicable services agreement
- To communicate with You about and manage Your User Account
- To properly store and track Your data within Our system
- To respond to lawful requests from public and government authorities, and to comply with applicable state/federal law, including cooperation with judicial proceedings or court orders.
- To protect Our rights, privacy, safety or property, and/or that of you or others by providing proper notices, pursuing available legal remedies, and acting to limit Our damages
- To handle technical support and other requests from You
- To enforce and ensure Your compliance with Our Terms of Use or the terms of any other applicable services agreement We have with You
- To manage and improve Our operations and the Applications, including the development of additional functionality

- To manage payment processing
- To evaluate the quality of service You receive, identify usage trends, and thereby improve Your user experience
- To keep Our Applications safe and secure for You and for Us
- To send You information about changes to Our terms, conditions, and policies (with Your consent, if required by law)
- To allow Us to pursue available remedies or limit the damages that We may sustain

## **WHERE IS YOUR PERSONAL DATA PROCESSED?**

### Section 4

Personal Data Bedford Medical Alert collects through the Application will be stored on Amazon Web Services, a third-party cloud-based server, even if you are accessing the Applications from outside the United States. Your country's data protection laws may not apply and may be more stringent than those to which Bedford Medical Alert is legally subject. Personal Data may be transmitted to third parties, which parties may store or maintain the data on their secure servers. These third parties are not permitted to transfer Your Personal Data outside of the United States.

## **WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?**

### Section 5

Yes, with third parties that help Us power Our Application

Bedford Medical Alert has a limited number of service providers and other third parties ("Business Partners") that help Us run various aspects of Our business. These Business Partners are contractually bound to protect Your Personal Data and to use it only for the limited purpose(s) for which it is shared. Business Partners' use of Personal Data may include, but is not limited to, the provision of services such as data hosting, IT services, customer service, and billing management.

Yes, with third parties and the government when legal or enforcement issues arise

We may share Your Personal Data, if reasonable and necessary, to (i) comply with legal processes or enforceable governmental requests, or as otherwise required by law; (ii) cooperate with third parties in investigating acts in violation of this Agreement; or (iii) bring legal action against someone who may be violating the Terms of Use or who may be causing intentional or unintentional injury or interference to the rights or property of Bedford Medical Alert or any third party, including other users.

Yes, with third parties that provide advisory services

We may share Your Personal Data with Our lawyers, auditors, accountants, or banks, when We have a legitimate business interest in doing so.

Yes, with third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Bedford Medical Alert's corporate entity, assets, or stock (including in connection with any bankruptcy or similar proceedings)

If We share Your Personal Data with a third party other than as provided above, You will be notified at the time of data collection or transfer, and You will have the option of not permitting the transfer.

### **Anonymized Data**

We may, from time to time, rent or sell aggregated data and/or other information that does not contain any personal identifiers (i.e., if the information has been anonymized by stripping out identifiers such as name, address, phone number, etc.). The purpose of this type of disclosure is to provide healthcare professionals, research institutions, and other interested real-world information about the usefulness of remote patient monitoring and outcomes from caregiver engagement. Once Your data is anonymized, it is no longer Personal Data, and We are not restricted in Our use of that data for any purpose.

## **HOW LONG DO WE RETAIN PERSONAL DATA?**

### **Section 6**

We will retain Your Personal Data for as long as you maintain a User Account and up to 60 days after the account is closed unless we have a legal obligation to retain it for longer. The exact period of retention will depend on the type of Personal Data, Our contractual obligation to You, and applicable law. We keep Your Personal Data for as long as necessary to fulfill the purpose for which it was collected, unless otherwise required or necessary pursuant to a legitimate business purpose outlined herein. At the end of the applicable retention period, We will remove Your Personal Data from Our databases and will request that Our Business Partners remove Your Personal Data from their databases. If there is any data that We are unable, for technical reasons, to delete entirely from Our systems, We will put in place appropriate measures to prevent any further processing of such data. We may retain anonymized data indefinitely. Contact Us at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca) regarding the applicable data retention period for Your Personal Data.

NOTE: Once We disclose Your Personal Data to third parties, We may not be able to access that Personal Data any longer and cannot force the deletion or modification of any such information by the parties to whom We have made those disclosures. Written requests for deletion of Personal Data other than as described should be directed to [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca).

## **HOW DO WE PROTECT YOUR PERSONAL DATA?**

### **Section 7**

Bedford Medical Alert is committed to protecting the security and confidentiality of Your Personal Data. We use a combination of safeguards to maintain the security and integrity of Your Personal Data, to protect against any anticipated threats or hazards to the security or integrity of such information, and to protect against unauthorized access to or use of such information in Our possession or control that could

result in substantial harm or inconvenience to you. However, Internet data transmissions, whether wired or wireless, cannot be guaranteed to be 100% secure. As a result, We cannot ensure the security of information you transmit to Us. By using the Applications, you are assuming this risk.

#### Safeguards

The information collected by Bedford Medical Alert and stored on secure servers, is protected by a combination of technical, administrative, and physical security safeguards, such as authentication, encryption, backups, and access controls. If Bedford Medical Alert learns of a security concern, We may attempt to notify you and provide information on protective steps, if available, through the email address that you have provided to Us or by an in-app notification. Depending on where you live, you may have a legal right to receive such notices in writing.

You are solely responsible for protecting information entered or generated via the Applications that are stored on Your device and/or removable device storage. Bedford Medical Alert has no access to or control over Your device's security settings, and it is up to You to implement any device-level security features and protections You feel are appropriate (e.g., password protection, encryption, remote wipe capability, etc.). **We recommend that You take any and all appropriate steps to secure any device that You use to access Our Applications.**

NOTWITHSTANDING ANY OF THE STEPS WE TAKE TO PROTECT YOUR PERSONAL DATA, IT IS NOT POSSIBLE TO GUARANTEE THE SECURITY OR INTEGRITY OF DATA TRANSMITTED OVER THE INTERNET. WE CANNOT GUARANTEE THAT YOUR PERSONAL DATA WILL NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF ANY OF OUR SAFEGUARDS. **THEREFORE, WE DO NOT AND CANNOT ENSURE OR WARRANT THE SECURITY OR INTEGRITY OF ANY PERSONAL DATA YOU TRANSMIT TO US AND YOU TRANSMIT SUCH PERSONAL DATA AT YOUR OWN RISK.**

## **HOW CAN YOU PROTECT YOUR PERSONAL DATA?**

### Section 8

In addition to securing Your device, as discussed above, We will NEVER send you an email requesting confidential information such as account numbers, usernames, passwords, or social security numbers, and You should NEVER respond to any email requesting such information. If You receive such an email purportedly from Bedford Medical Alert, DO NOT RESPOND to the email and DO NOT click on any links and/or open any attachments in the email, and notify Bedford Medical Alert at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca).

**You are responsible for taking reasonable precautions to protect Your user ID, password, and other User Account information** from disclosure to third parties, and You are not permitted to circumvent the use of required encryption technologies. You should immediately notify Bedford Medical Alert at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca) if You know of or suspect any unauthorized use or disclosure of Your user ID, password, and/or other User Account information, or any other security concern.

# YOUR RIGHTS

## Section 9

You have certain rights relating to Your Personal Data, subject to local data protection laws. These rights may include the right:

- to access Your Personal Data held by Us;
- to erase/delete Your Personal Data, to the extent permitted by applicable data protection laws;
- to receive communications related to the processing of Your personal data that are concise, transparent, intelligible and easily accessible;
- to restrict the processing of Your Personal Data to the extent permitted by law (while We verify or investigate Your concerns with this information, for example);
- to object to the further processing of Your Personal Data, including the right to object to marketing;
- to request that Your Personal Data be transferred to a third party, if possible;
- to receive Your Personal Data in a structured, commonly used and machine-readable format
- to lodge a complaint with a supervisory authority;
- to rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete; and
- to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making").

Where the processing of Your Personal Data by Bedford Medical Alert is based on consent, You have the right to withdraw that consent without detriment at any time by emailing Us at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca).

You can exercise the rights listed above at any time by contacting Us at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca).

### **How do You update, correct, or delete Personal Data?**

You can change Your email address and other contact information by contacting [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca). Please note that in order to comply with certain requests to limit use of Your Personal Data, We may need to terminate Your account and Your ability to access and use the Services, and You agree that We will not be liable to you for such termination. You can deactivate Your account by contacting [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca).

Although We will use reasonable efforts to do so, You understand that it may not be technologically possible to remove from Our systems every record of Your Personal Data. The need to back up Our systems to protect information from inadvertent loss means a copy of Your Personal Data may exist in a nonerasable form that will be difficult or impossible for Us to locate or remove.

## **CAN YOU “OPTOUT” OF RECEIVING COMMUNICATIONS FROM US?**

### **Section 10**

We pledge not to market third party services to you without Your consent. We only send emails to you regarding Your Bedford Medical Alert account and services that are necessary for us to provide the services to you, such as verification of your account.

## **INFORMATION SUBMISSION BY MINORS**

### **Section 11**

We do not knowingly collect Personal Data from individuals under the age of 18 and Bedford Medical Alert is not directed to individuals under the age of 18. We request that these individuals not provide Personal Data to Us. If We learn that Personal Data from users less than 18 years of age has been collected, We will deactivate the account and take reasonable measures to promptly delete such data from Our records. If You are aware of a user under the age of 18 using the Applications, please contact Us at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca).

## **HOW TO CONTACT BEDFORD MEDICAL ALERT**

### **Section 12**

If you have any questions about this Privacy Policy, please contact Us by email at [info@bedfordmedicalalert.ca](mailto:info@bedfordmedicalalert.ca) or write to Us at: Bedford Medical Alert, 2 Bloor St. W., Suite 700, Toronto, ON, M4W 3E2 . Please note that email communications are not always secure; so please do not include sensitive information in Your emails to Us.