

## **Balance Privacy Statement**

*Effective date: September 30, 2019*

### **IMPORTANT NOTICE:**

Below, **you** and **your** means any individual with access to Balance. **We, us** and **our** means Alberta Blue Cross.

Balance is available for use by Alberta Blue Cross members, their dependants or individuals invited by us to use the program. If you have access to Balance and choose to use it, this Balance Privacy Statement ('Statement') will apply to you.

We have developed the Statement to explain how we may collect, use, share and retain your personal information when you use Balance.

This Statement describes your rights regarding personal information in Balance, and how you can access it, correct it and remove your consent.

By using and continuing to use Balance, you give us permission to collect, use and share your personal information as described in this Statement. Your consent will be effective from the date you start participating in Balance until you remove it.

We value our relationship with you and make it our mission to protect the personal information you give us. Our Privacy Policy explains how we treat your personal information; however, we believe it is important to provide specific details about our privacy practices related to Balance. The personal information collected, used and shared in Balance is subject to various personal information protection legislation in Canada.

From time to time we may make changes to our Privacy Policy. Please visit [ab.bluecross.ca](http://ab.bluecross.ca) to view the most current information.

### **What is Balance? +**

Balance is a health management program providing lifestyle, fitness and wellness information. Balance is operated by us or by third-party licensors, under a contract with us.

Balance is designed to collect personal information directly from you. The information you provide through Balance does not impact your Alberta Blue Cross coverage. Your use of Balance is voluntary, even if you have access to it through your benefit plan.

## **When we collect and use personal information: +**

- When you first access Balance, we collect the following information to create your profile, personalize your experience, communicate with you and respond to questions: +
  - Name;
  - Date of birth;
  - Gender;
  - Address;
  - Postal code;
  - Email address; and
  - Username and password.

If you have Balance as part of your Alberta Blue Cross benefits, the personal information listed above will be shared from your plan to Balance, so you don't have to re-enter information.

- When you complete the health risk assessment (the "HRA") in Balance, Balance creates an action plan for you. The personal information collected in the HRA includes +
  - fitness and wellness information,
  - activity level,
  - dietary concerns,
  - fitness goals,
  - stress levels,
  - environmental factors,
  - height, and weight
  - sleep activity, and
  - other bodily-process information.
- When you choose to connect your fitness tracker to Balance, the information collected will help you track your activity. +
  - You can revoke the permissions for your fitness tracker at any time in the device's account settings.
- When you use Balance Trackers or take part in Balance challenges, you provide information to track your progress.
- When you communicate with us or sign up for reminders, we will use your email address to send you notifications +
  - You can change the type of emails you receive from Balance with the user preferences under "Manage my email subscriptions".

- When you choose to connect to social media services, you can share badges you earn in Balance. +
  - Your use of social networks is subject to the terms and conditions and any policies you agreed to with them.
- We may use your personal information without your knowledge or consent to comply with or when permitted by applicable law or regulation.
- In addition, we may use your personal information to improve the site, develop and improve our services for you.
- We will get your permission before using your personal information for new or unrelated purposes.

### **When we share your personal information for Balance: +**

We share your personal information with third parties in limited circumstances:

- For health reward redemption, only the information needed to send you the reward will be shared, for example your mailing address or email address.
- To third party service providers who require information to assist us in managing Balance.
- We may also share your personal information for the following purposes where required or permitted by applicable law. +
  - To abide by legal obligations or valid legal and regulatory requirements.
  - During emergency situations or where necessary to protect the safety of others.
  - If a business transfer or change in ownership occurs.
  - For additional purposes with your consent where your consent is required by law.

### **How you access and correct errors in Balance: +**

- As Balance is a user driven website with the information coming from you, you can access your information by accessing the site. You can correct errors entered by you within the site to ensure it remains up-to-date and accurate.
- If the errors relate to your name or coverage number, please contact the Alberta Blue Cross office to correct the errors by phone, the member site or in person.

### **How you can withdraw your consent: +**

You may withdraw your consent to participate in certain aspects of Balance by:

- controlling your communication preferences;
- managing cookie preferences; and
- removing access on your fitness tracker.

You have the legal right to withdraw your consent to the collection, use and sharing of your personal information under the Balance program at any time. By withdrawing your consent, you may no longer be able to use certain services, earn points or redeem rewards.

If you would like to fully withdraw your consent, please contact our privacy office.

#### **How long we keep your personal information: +**

- We keep your information for as long as it is needed to:
  - manage the services we provide to you in Balance;
  - fulfil any reporting or accounting requirements.
  - comply with legal and regulatory requirements.
- We destroy your information in a secure way, when it is no longer needed for the reasons identified or required for legal reasons.
- We will remove personal identifiers on all personal information associated with terminated Balance accounts that have had no activity on them for two (2) years. Examples of personal identifiers removed are your name, address and email address.

#### **Combined Data: +**

- Under some circumstances, we may make your personal information anonymous. The data will no longer be associated with you. We may use this anonymous information for valid business reasons without further notice to you or your consent.
- We may combine anonymous information to create a collection of data that may be shared in the following ways:
  - To understand overall user needs to design programs and activities on the Balance site.
  - To perform research and studies aimed at improving our products, services and technologies.
  - For clinical research, market research, education and other related projects.
  - When part of your employer health benefits, for your employer to gauge the health of their organization and identify areas for wellness interventions.

#### **Cookies: +**

We collect non-personal information about your use of Balance with cookies. Cookies are a small amount of data generated by a website which are saved by your web browser. Every computer that accesses Balance is assigned a different cookie. The information collected by cookies:

- helps us generate advertising and content on web pages or in newsletters;
- allows us to statistically track how many people are using the site;
- shows us how many people open our emails; and
- shows the purposes for which these actions are being taken.

We may use cookie information to target certain content to help us understand your web use and how long you spend on our website.

We do not link non-personal information from cookies to personally identifiable information without your permission. We do not use cookies to collect or store personal health information about you.

For your use of the Member Services site to access Balance, your browser must be set to accept cookies due to the enhanced security features. If you are concerned about having your browser enabled to accept all cookies, you can set your browser to notify you prior to a website adding a cookie. We suggest using the help button on your computer or web browser to find out how to set the browser to notify you about cookies.

#### **Contacting you: +**

From time to time we may need to send you notifications relevant to the performance of our Balance site, for example a notice regarding a change to this Statement. These notices do not fall under your email preferences.

#### **Changes to this Statement: +**

- We reserve the right to update this Statement at any time to reflect changes to our business, the website or applicable laws.
- The revised Statement will have a published effective date. If the revision includes material changes, we will provide notice of the changes by posting a notification of the revised Statement on the Balance website.

#### **Contact us: +**

- If you have any questions, concerns or comments about this Statement or any privacy related topics, please email [privacy@ab.bluecross.ca](mailto:privacy@ab.bluecross.ca) or contact us by mail at Alberta Blue Cross, Privacy Officer, 10009 108 ST NW, Edmonton, Alberta, T5J 3C5.
- Note: email is not a 100 per cent secure medium. Please consider the type of personal information you are sending to us when contacting us via email.