

## Person Centred Software

### US & Canada Privacy Annex

**Updated:** 5 November 2024

PCS is committed to protecting your data and respecting your privacy.

#### **Introduction**

This US & Canada Privacy Annex adds a few specific provisions to the Privacy and Data Protection Statement available [here](#) (“Main Privacy Statement”) to address local privacy requirements.

This US & Canada Privacy Annex applies only to the Personal Data that are subject to federal or state laws of US and Canada.

A reference to “PCS”, “we,” “us” or the “Company” is a reference to Person Centred Software Limited and its relevant affiliates, including ResHub Healthcare Inc., involved in the collection, use, sharing, or other processing of Personal Data.

This privacy annex contains the following sections that supplement the information in Main Privacy Statement. Please read the following additions alongside the Main Privacy Statement and its glossary.

- 1. OPT-OUT OF PROFILING AND TARGETED ADVERTISING**
- 2. SENSITIVE PERSONAL DATA HANDLING**
- 3. DATA MINIMIZATION AND PURPOSE LIMITATION**

#### **1. OPT-OUT OF PROFILING AND TARGETED ADVERTISING**

You have the right to opt out of the processing of your Personal Data for the purposes of profiling and targeted advertising. Profiling refers to the automated processing of Personal Data to evaluate certain personal aspects, such as analyzing or predicting your personal preferences, interests, or behaviors. Targeted advertising refers to delivering advertisements to you based on your online behavior across different websites.

We currently do not use profiling and target advertising.

How to Opt Out: Still if you do not wish for your Personal Data to be used for profiling or targeted advertising, you can exercise your right to opt out by sending us an email at [DataProtection@personcentredsoftware.com](mailto:DataProtection@personcentredsoftware.com).

Please note that opting out of targeted advertising or profiling will not affect the general display of advertisements. You may still see non-targeted ads that are not tailored to your preferences or behaviors.

#### **2. SENSITIVE PERSONAL DATA HANDLING**

We do not collect or process Sensitive Personal Data for us as Controller. Sensitive Personal Data includes, but is not limited to, information regarding your race or ethnic origin, religious or philosophical beliefs, sexual orientation, health, genetic or biometric data, and information related to criminal convictions or offenses.

- Consent for Sensitive Data: In the event that we do collect Sensitive Personal Data, we will request your explicit consent prior to processing this information. If
- You have the right to withdraw your consent at any time by contacting us at [DataProtection@personcentredsoftware.com](mailto:DataProtection@personcentredsoftware.com).

### **3. DATA MINIMIZATION AND PURPOSE LIMITATION**

We are committed to only collecting the minimum amount of Personal Data necessary to fulfill the purposes described in the Main Privacy Statement. We will not collect more data than is required for these purposes.

Personal Data will only be processed for the purposes specified in the Main Privacy Statement, unless we obtain your consent for additional uses or unless such processing is required or permitted by law. We will not use Personal Data for purposes that are incompatible with the original collection purposes without notifying you.

### **4. QUEBEC ONLY RIGHTS**

The following rights shall apply only to Personal Data subject to Quebec's Law 25

#### **Data Portability**

You have the right to request that we transfer your Personal Data to you or to a third party of your choice. Upon your request, we will provide your Personal Data in a structured, commonly used, and machine-readable format.

To request the transfer of your Personal Data, please contact us at [DataProtection@personcentredsoftware.com](mailto:DataProtection@personcentredsoftware.com). We will process your request as quickly as possible, and no later than within the timeframe required by applicable privacy laws.

Please note that this right applies only to Personal Data that you have provided to us directly, and only where the processing is carried out by automated means and based on your consent or the performance of a contract.

#### **Privacy Impact Assessments (PIA)**

We are committed to ensuring that any new projects, systems, or services that involve the collection, use, or disclosure of Personal Data are designed with privacy in mind. When we engage in activities that involve high-risk processing of Personal Data, we will conduct a Privacy Impact Assessment (PIA) to evaluate the potential impact on your privacy.

The PIA will help us identify any privacy risks associated with the processing of Personal Data and implement measures to mitigate those risks, ensuring compliance with applicable privacy laws, including Quebec's Law 25.

We will conduct a PIA when processing Personal Data that may pose a high risk to your rights and freedoms, including:

- Processing of Sensitive Personal Data (e.g., health, biometric, or financial data).
- Large-scale monitoring of individuals (e.g., for marketing or profiling purposes).
- Introduction of new technologies that affect the processing of Personal Data.

The results of a PIA will guide us in determining the appropriate technical and organizational measures to safeguard your Personal Data. If the PIA indicates a high risk that cannot be mitigated, we may consult with the appropriate privacy regulator before proceeding with the processing activity.