PRIVACY POLICY

Last updated: December 12, 2024.

At Breakthrough Counselling, we are committed to protecting the privacy and confidentiality of all Personal Information that we collect, particularly sensitive health information.

Our Privacy Policy describes how we collect, use, share and protect the Personal Information of our clients, website users' and collaborators ("**you**"). The Policy also details the types of information we may collect from you or that you may provide to us when visiting our Website btcounselling.com, in the context of the services we provide or that you provide to us or on our behalf. Finally, it provides an overview of our practices and commitments in respect of your rights and our obligations pursuant to applicable privacy legislation.

For any questions relating to the processing of your Personal Information or your rights under the law or this Policy, please contact the person responsible for the protection of Personal Information at : privacy@btcounselling.com

YOUR CONSENT

In using our Website or our services, you consent to our collection, use, disclosure and storage of your Personal Information, including Personal Health Information as described in this Policy.

For this reason, we require that you carefully review this Policy **before** using our services or our Website. If you do not agree with the terms of the Policy, we ask that you do not use our services or Website.

Depending on the services requested, you may be asked to register or otherwise access our clinic management platform, which is operated by Jane Software Inc. ("Jane Mobile App"). If this is the case, you will be asked to review and acknowledge For more information about the ways in which your information may be processed by Jane Software through the Jane Mobile App, please refer to their Privacy Notice : https://jane.app/legal/privacy-notice.

WHAT IS "PERSONAL INFORMATION"?

"**Personal Information**" generally refers to any information that relates to an identifiable individual, including information that can be used on its own or with other information to identify, contact, or locate that individual.

For the purpose of this Policy, Personal Information includes Personal Information that is sensitive

in nature as well as **health and social services information**, insofar as that information allows an individual to be identified ("**Personal Health Information**").
Personal Information does *not* include business contact information or information that does not allow your identification, such as purely demographic information or statistical/aggregated information and may be derived from Personal Information.

WHAT INFORMATION DO WE COLLECT AND WHY?

Breakthrough Counselling collects information from you when you request our services, engage with our counsellors or collaborators, register on our Website, respond to a survey or communication such as e-mail, or participate in another Website feature.

The following information is generally collected through our direct interactions with you or through third parties, where you authorize us to:

- **Contact and identification information**, that we may use to confirm your identity (directly or indirectly) and provide you with the requested services. Contact and identification information is generally considered to be Personal Information and includes your name, mailing address, e-mail address, telephone number, internet protocol (IP) address, usernames, time of connection to the Website and any other identifier we may use to contact you;

- **Transactional or financial information** which allows us to process payments, such as billing and account information, credit card information, insurance policy numbers, etc., for services required from us or to process any payments owed to you;

- **Health and social services information** that concerns your physical or mental health state and your health determinants (ex: medical or family history), or the health and social services provided to you (ex: nature of services received, results, location where services were provided, identity of provider, …). This type of information may be considered sensitive and will be collected and used only to the extent it is necessary to provide you with the requested services;

- **Employment-related information**, including work experience and other information contained in a resume, CV, cover letter or job application or collected through screenings and interviews;

- **Communication information** that includes any communication that you send to us whether that be through the contact form on our Website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this information for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defense of legal claims;

- By providing your phone number to BreakThrough Counselling, you consent to receiving text messages related to scheduling and appointment management, such as confirming, rescheduling, or answering inquiries regarding appointments. Text messages will not be used for marketing, clinical purposes, or any counselling-related content.

Message and data rates may apply. Message frequency will vary based on appointment needs. You may opt-out of receiving further text messages at any time by replying "STOP." For more information on how my data will be handled, please read below.

- **Marketing information** that includes information about your preferences in receiving marketing materials from us and from our collaborators and your communication preferences. We process this information to enable you to take advantage of our offers, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. We also collect certain types of information through automated technologies or interactions (ex: cookies, web beacons) when you navigate through our Website. The information collected includes:

- **Website interaction information** that pertains to your use our Website and any online services. We process this data to operate our Website and ensure relevant content is provided to you, to ensure the security of our Website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business.

- **Technical information** which includes information about your use of our Website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our Website, page views and navigation paths, details about the number of times you use our Website and. This information is gathered from our analytics tracking system and is processed to analyse your use of our Website and other online services, to administer and protect our business and Website, to deliver relevant website content to you and to understand the effectiveness of our advertising.

For more information about the automated technologies we use, please refer to the "***Cookies***" section of this Policy.

HOW DO WE USE YOUR INFORMATION?

In addition to the purposes stated in the previous section, we may use the information we collect from you when you register, request our services, respond to a survey or marketing communication, surf the Website, or use certain other site features in the following ways:

- Provide you with access to our Website and information about our services and products;
- Respond to your inquiries and contact requests;
- Provide you with the services requested or any other purposes for which you provided the information or that were described when it was collected;
- Process and assess your job application and employment relationship with us, if any;
- Carry out our obligations and enforce our rights arising from any contracts with you, including for delivery of services, billing and collection or to comply with legal requirements;
- Notify you about changes to our Website or any products or services we offer or provide though it;

- Improve our Website, products or services, marketing, or customer relationships and experiences.

If you request or inquire about our services or otherwise agree to receive marketing communications (and in each case have not opted out of receiving such communications since), we may use your email address to send you promotional or marketing communications. If you no longer wish to receive such emails, you may opt-out by unsubscribing from emails via the unsubscribe button which can be found at the bottom of each email or by sending admin@btcounselling.com an email with your request to stop receiving emails.

DISCLOSURE OF YOUR PERSONAL INFORMATION

Breakthrough Therapy will not sell, trade, or otherwise transfer your personally identifiable information to outside parties unless we provide you with advance notice, except as described below.

We may have to share your Personal Information with the parties set out below:

- Health and social services providers who are involved in your care and services provided to you.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.
- 3rd party technology platforms and advertisers that support the running and growth of Breakthrough Therapy;
- Any other third party, with your consent.

We require all third parties to whom we transfer your data to ensure the security of your Personal Information and to treat it in accordance with the law. We only allow such third parties to process your Personal Information for specified purposes and in accordance with our instructions.

We may also release your information when we believe release is appropriate to comply with the law, enforce our company policies, or protect ours or others' rights, property, or safety. Non-personally identifiable information may be provided to other parties for marketing, advertising, or other uses.

TRANSFER OF PERSONAL INFORMATION

We may process, store, and transfer your Personal Information in jurisdictions outside of Quebec, such as the United States and the European Economic Area. These jurisdictions have different privacy laws that may or may not be as comprehensive as the laws that apply in the province of Quebec. In such circumstances, the governments, courts, law enforcement, or regulatory agencies of

that country may be able to obtain access to your Personal Information through the laws of the foreign country.

INFORMATION SECURITY

We have put in place security measures to prevent your Personal Information from being accidentally lost, used, altered, disclosed, or accessed without authorization. We also allow access to your Personal Information only to those employees and partners who have a business need to know such information. Employees and partners will only process your Personal Information under strict instructions and are required to keep it confidential. We have procedures in place to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach if we are legally required to.

DATA RETENTION

We will only retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When deciding what the correct time is to keep the information for we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For instance, tax legislation requires us to keep basic information about our clients (including contact, identity, financial and transaction information) for seven years after they stop being clients. In some circumstances we may anonymize your Personal Information to use it for legitimate business purposes without further notice to you.

COOKIES

As you browse Breakthrough Counselling's Website, advertising cookies will be placed on your computer so that we can understand what you are interested in. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. To opt out of cookies, find and select the settings tab of your internet browser and click "block third party cookies and site data" or de-select the "accept cookies" box

THIRD PARTY LINKS

In an attempt to provide you with increased value, we may include third party links on our site. If you choose to access any such sites, you do so at your own risk. These third-party sites are managed independently from Breakthrough Therapy and we have no control over the content which may be

displayed on these sites or the practices of the operators of those sites. Please be mindful that clicking on links may allow the third party to collect or share data about you. Breakthrough Therapy has no responsibility or liability for the content and activities of these linked sites.

Nonetheless, we seek to protect the integrity of our Website and welcome any feedback about these linked sites (including if a specific link does not work).

CHILDREN'S PERSONAL INFORMATION

Our Website is not intended for children under 14 years of age. If you are under 14, do not use or provide any information about yourself on this Website.

We do not knowingly collect Personal Information from children under 14 unless we have obtained parental consent. If we learn we have collected or received Personal Information from a child under 14 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 14, please contact us at privacy@btcounselling.com.

YOUR RIGHTS IN RESPECT OF PERSONAL INFORMATION

As a person concerned by Personal Information, you have certain rights with respect to your Personal Information.

- **Access and Portability.** You have the right to request a record of the Personal Information that we have collected about you and to ask that the information be provided in a structured, commonly used electronic format (where applicable and technically feasible). There may be some cases where we cannot provide you with certain information about you if it would mean disclosure of Personal Information of another person or other confidential information, or if it would compromise our security systems. If you require access to your Personal Information, please contact us and will respond to you within thirty (30) days of receiving your request. We may charge a fee where permitted by applicable law.
- **Correction and Deletion.** It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. You may update, correct or delete your account information at any time by logging into your user account and modifying your Personal Information, including your preferences to receive messages from us. You may also ask us to update, correct or delete your Personal Information by contacting us as noted below. Every request to correct or delete Personal Information, including Personal Health Information, will be processed in accordance with applicable laws and professional regulations.

- **Object or restrict processing**. In certain circumstances provided for by law, you may ask us to restrict access to your Personal Health Information by certain individuals, including specific providers or categories of providers. Such request must be made in writing and include your name and coordinates, your signature and the date of the request.
- **Request additional information about processing**. You can request additional information about our Personal Information processing practices, including who has accessed your Personal Health Information and at what time and date.
- **Withdrawing Consent.** Where we have relied on your consent to use your Personal Information, you have the right to withdraw that consent at any time by contacting us as noted below, which we will give effect to promptly. In addition, all our marketing email messages contain the ability to automatically "opt-out" or unsubscribe from our mailing lists and marketing messages.

We may request additional information from you to help us confirm your identity and authority to make any of the preceding requests.

In certain cases, we may be authorized or required by law or professional regulation to refuse to provide you with access to, correct or delete some or all of the Personal Information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your Personal Information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

CHANGES TO OUR POLICY

If we decide to change our Privacy Policy, we will post those changes on this page. Policy changes will apply only to information collected after the date of the change.

QUESTIONS AND FEEDBACK

We welcome your questions, comments, and concerns about privacy. Please send us any and all feedback pertaining to privacy, or any other issue via email at: privacy@btcounselling.com

Contact Address:
Breakthrough Counselling Inc.
C/O **Privacy Officer**
5845 chemin de la côte des neiges, suite 445
Montreal, Quebec
H3S 1Z4