


## C5.17 Online Properties Privacy Policy

	<b>ADMINISTRATIVE AND OPERATIONAL POLICY MANUAL</b>			
	<b>ONLINE PROPERTIES PRIVACY POLICY</b>			
	<b>C5</b>	<b>PRIVACY</b>		
	Review Responsibility	Privacy Officers & IT	Approval	Director, Operations and Organizational Systems

### Operational Policy

FHC is committed to respecting the privacy of users accessing its website and social media platforms and has prepared this Policy Statement to inform clients and staff of our policy and practices concerning the collection, use, and disclosure of Personal Information when engaging with our website.

This policy is intended to inform users about the following regarding our online platforms:

- The types of anonymous and identifying information collected from casual visitors and general users of the FHC Website and platforms including Facebook, Instagram, and LinkedIn.
- Cookies, log files, and use of other mechanisms to automatically collect user device information.
- Purposes for which user information is collected and how it will be used.
- Sharing of user data with any third parties.
- Requirements and procedures for obtaining consent where required, including express consent for the installation of executable programs on a user's system.
- Handling, retention, and destruction of users' information.

### Consent

By using our Site, users agree that they consent to the conditions set out in this Policy.

### Operational Procedures

#### How we use personal information

- When users provide us with information through our 'Contact' option, their information is received by our EA and administrative staff. We may disclose the contents of user message to any member of our agency who has been assigned to answer the inquiry.

#### Cookies, Log Files, Other Mechanisms to Collect Information

- FHC's website is encrypted with secure certification so any information sent to or received from the site is encrypted.

- Users have control over the cookies settings on the device you are using to access our Site.
- Cookies are intended to make it easier for users to access Sites repeatedly, and users can adjust their settings to avoid cookies or can erase cookies history when they are done.
- FHC does not use automatic log files or any other mechanisms to collect information from users of our website. We do not share any user data with any third parties.

### **Other Disclosures**

- We will not share user information with other third parties, except in the following cases:
  - If the law requires it.
  - If it is required for any legal proceeding in which we are required to submit evidence.
  - To prove or protect our legal rights.
- If users follow hyperlinks from our Site to another Site, from our Quick Links and Client Resources for example, we are not responsible for and have no control over privacy policies and practices of these external sites.
- Our Social media platform includes Facebook, Instagram, Twitter and LinkedIn.
- These providers may collect user IP address, which page a user is visiting on our Platform, and may set a cookie to enable the feature to function properly. User interactions with these providers are governed by the Policy of the company providing it.
- If users have any questions or concerns about FHC's Online Properties Privacy Policy, they may contact FHC's Privacy Office.

### **Retention and Destruction of User Information**

- User information collected through the FHC website, such as inquiries submitted via the 'Contact' feature, will be retained for 12 months to ensure follow-up and resolution.
- All user information, collected through the website, will be permanently deleted using data deletion software, once the retention period has passed.
- The Privacy Officer will coordinate with the FHC website management and hosting team the destruction of user information to ensure compliance with this policy.
- Retention timelines and destruction practices will be reviewed annually by the Privacy Officer in collaboration with the website management and hosting team as necessary.

### **Opt-Out Rights & Process**

- Users engaging with the FHC website, have the right to opt out of receiving electronic communications from FHC at any time, including newsletters, program information.
- To opt out of receiving electronic communications, users may click the 'Unsubscribe' link included in the emails sent or contact directly info@fhc-chc.com.
- All opt-out requests will be processed within five business days. Users who opt out will no longer receive electronic communications, except for any updates they have agreed to receive related to their inquiries or services.

## **APPROVALS & REVIEW CYCLE**

**Reviewed by:** Management Team Every 3 years in Q4

**Approved by:** Senior Leadership Team

**Last Revisions:** January 2025, August 2024

**Last Approved:** January 2025, August 2024