fhc FLEMINGDON HEALTH CENTRE

C5.12 – Online Properties Privacy Policy

Policy Name: Online Properties Privacy Policy
Policy Number: C5.12
Policy Type: Operational
Review Responsibility: Chief Privacy Officer / Privacy Officers / IT
Last Review: September 2026
Approval: Chief Executive Officer / Management Team

1. Purpose

This policy establishes Flemingdon Health Centre's (FHC) privacy requirements for its online properties. It explains how FHC may collect, use, disclose, retain and protect personal information and personal health information (PHI) when individuals interact with FHC through websites, online forms, surveys, registration pages, client portals, social media, embedded or linked third-party services, and other FHC-authorized digital channels.

This policy supports transparent and privacy-conscious use of online technologies while ensuring that information received through FHC's online properties is handled consistently with the C5 Privacy Management Program and other applicable FHC requirements.

2. Scope

This policy applies to:

- FHC public websites, microsites and other web pages operated or controlled by FHC;
- online forms, surveys, event or program registration pages and other digital collection tools used by FHC;
- FHC-authorized client portals and other online service channels;
- FHC-authorized social media platforms and accounts;
- third-party tools, services, content or features that FHC embeds in or uses to support its online properties; and
- hyperlinks and other connections from FHC online properties to external websites or platforms, to the extent FHC is responsible for the information handling that occurs before a user leaves the FHC-controlled environment.

This policy applies to FHC personnel and Agents who create, administer, manage or use online properties on FHC's behalf.

3. Policy

3.1 General Principles

FHC will collect, use and disclose information through its online properties only for authorized purposes and in accordance with applicable law, FHC's Privacy Management Program and approved FHC practices. FHC will limit the information it collects to what is reasonably

necessary for the purpose and will use reasonable safeguards appropriate to the nature and sensitivity of the information.

FHC will seek consent where consent is required for the collection, use or disclosure of information through an online property.

3.2 Information FHC May Collect

Depending on the online property and the way an individual chooses to interact with FHC, FHC may collect:

- information an individual chooses to provide, such as name, contact information, messages, survey responses, registration information or other information submitted through an approved online form or service;
- technical and usage information, such as internet protocol (IP) address, browser or device information, pages or features used, date and time of access, referral information, and similar information generated when an online property is used; and
- information collected through cookies, analytics tools or similar technologies used to operate, secure, understand or improve FHC's online properties.

The specific information collected may vary by online property. Where appropriate, FHC will provide a notice at or before the point of collection that explains the purpose of the collection and any choices available to the individual.

3.3 How FHC Uses Information Collected Online

FHC may use information collected through its online properties to:

- respond to questions, requests and inquiries;
- administer programs, services, events, surveys, registrations or other online activities;
- operate, maintain, secure, troubleshoot and improve FHC's online properties;
- understand how online properties are used and measure their effectiveness;
- communicate information about FHC programs, services, initiatives, events or other activities where permitted; and
- meet legal, regulatory, contractual, security and organizational requirements.

Information collected through an online property will not be used for an unrelated purpose unless FHC has lawful authority to do so and obtains consent where required.

3.4 Online Forms and Personal Health Information

General website contact forms, public social media channels and other online tools that are not specifically approved for the collection of PHI must not be used to submit personal health information. FHC will provide notices or instructions on these channels, where appropriate, advising users not to submit PHI and directing them to approved channels for health-related information.

Where PHI is received unexpectedly through a general online channel, FHC will handle the information in accordance with the C5 Privacy Management Program and will take reasonable steps to move any necessary ongoing communication or record handling to an approved secure system.

Where an online form, portal or other digital service is specifically approved to collect or handle PHI, the information is also subject to FHC's privacy policies, consent requirements, security controls and applicable procedures.

3.5 Cookies, Analytics and Similar Technologies

FHC may use cookies, analytics services and similar technologies to support the operation, security, measurement and improvement of its online properties. These technologies may collect technical or usage information about a user's device and interaction with the online property.

Where reasonably available, users may manage non-essential cookies or similar technologies through browser, device or other available privacy settings. FHC will obtain consent for cookies or similar technologies where consent is required.

FHC may use approved third-party service providers to support website hosting, analytics, security, communications or other online functions. FHC will limit the information made available to service providers to what is reasonably necessary for the approved service and will apply appropriate contractual, privacy and security requirements where FHC is responsible for the information handling.

3.6 Social Media and External Websites

FHC may use FHC-authorized social media platforms to communicate with the public about programs, services, events, health information and organizational activities. Individuals should not submit PHI or other sensitive client information through public comments, direct messages or other social media features unless FHC has expressly approved the channel for that purpose.

Social media platforms and other third-party websites may independently collect information about users in accordance with their own privacy practices. FHC does not control the privacy practices of an external website or platform once an individual leaves an FHC-controlled online property or interacts directly with a third-party service.

FHC may provide links to external websites or resources for convenience and information. A link does not make FHC responsible for the privacy, security, content or information practices of the external site.

3.7 Disclosure and Sharing

FHC will disclose information collected through its online properties only where authorized or required. Information may be shared internally with personnel or Agents who need it to respond to an inquiry, provide an approved service, administer the online property or perform another authorized function.

FHC may also provide information to approved service providers that support its online properties, or disclose information where required or permitted by law, including where necessary to respond to legal process or protect FHC's legal rights, systems, users or operations.

FHC does not sell personal information collected through its online properties.

3.8 Retention and Secure Destruction

Information submitted through a general FHC website contact or inquiry function will normally be retained for 12 months to support follow-up and resolution, unless the information becomes part

of another FHC record or a different retention period applies under law, an approved retention schedule or another FHC policy.

Other information collected through online properties will be retained only for as long as necessary for the authorized purpose and applicable legal, operational, contractual or records-management requirements. When information is no longer required, FHC will securely delete, destroy or otherwise dispose of it using approved methods appropriate to the format and sensitivity of the information.

3.9 Electronic Communications and Opt-Out

FHC may use contact information provided through its online properties to send newsletters, program or service information, event information and other electronic communications where permitted by law and FHC policy. Consent will be obtained where required.

Individuals may opt out of optional electronic communications at any time by using the unsubscribe mechanism provided or another method identified by FHC. Opt-out requests will be processed promptly in accordance with FHC's electronic communications procedures. FHC may continue to send communications that are necessary to respond to an individual's inquiry, provide a requested service, administer an existing relationship or meet a legal obligation.

3.10 Safeguards and Third-Party Oversight

FHC will use reasonable administrative, technical, physical and contractual safeguards to protect information handled through its online properties against unauthorized access, use, disclosure, loss, alteration or destruction. Online technologies and third-party services that handle information on FHC's behalf must be reviewed and approved in accordance with applicable FHC privacy, security and technology requirements.

Where a third party acts as an Agent or service provider for FHC and handles PHI or other sensitive information, the arrangement will also be governed by C5.6 Safeguarding Personal Health Information and Managing Agents and any applicable agreement or security requirements.

3.11 Privacy Incidents

Suspected or confirmed privacy or security incidents involving information collected or handled through an FHC online property must be reported and managed in accordance with C5.11 Privacy Breach Management and applicable information-security incident procedures.

3.12 Privacy Questions, Rights and Complaints

Individuals may contact FHC's Privacy Office with questions or concerns about FHC's online information practices. Where information collected through an online property is PHI in FHC's custody or control, applicable client privacy rights, including access, correction and complaint rights, are governed by C5.8 Client Privacy Rights: Access, Correction and Complaints and the other applicable C5 policies.

4. Related Documents

- Procedures – Online Properties and Electronic Communications
- FHC Written Statement of Information Practices
- Information Security and Acceptable Use policies

- Records Retention and Secure Destruction requirements

5. Review

This policy will be reviewed at least every two years, or more frequently where required by changes in legislation, FHC's online properties, analytics or tracking technologies, third-party services, information practices, security risks or organizational requirements.

Approved by: Management Team on October 14, 2026.

Next review due: October 2028.