

Dimensions Privacy Practices

Our Privacy Practices describe how Personal Information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

1.	Who We Are	1
2.	Our Privacy and Confidentiality Obligations	1
3.	Types of Information Collected.....	2
4.	Uses and Disclosure of Personal Information.....	2
5.	Your Individual Rights	4
6.	How We Collect Information.....	5
7.	Protecting Your Personal Information.....	5
8.	Document Retention and Destroying Personal Information	5
9.	Accuracy	6
10.	Governing Law.....	6
11.	Opting Out	6
12.	Personal Information Outside of Canada.....	6
13.	Effective Date and Changes to Our Privacy Practices.....	6
14.	Privacy Officer and Contact Us	7

1. **Who We Are**

This is the Privacy Practices (the “**Privacy Practices**”) of Dimensions Health Centres, Inc. (“**Dimensions**”). Dimensions strives to help people improve and transform their lives by drawing on the restorative power of nature, spa rituals, food, and plant medicine ceremonies in safe, legal, and luxurious settings. Dimensions is inclusive of in-person and virtual services offered at these facilities, individually, and collectively.

“**You**” or “**guest**” refers to anyone who visits our website (www.dimensionshealing.com, hereinafter referred to as the “**Website**”), our customers, and anyone who engages with our services.

2. **Our Privacy and Confidentiality Obligations**

Dimensions is committed to protecting your privacy. We value the trust that you place in us in handling your personal information before, during, and after your Dimensions Retreat and Dimensions program experience. For the purposes of our Privacy Practices, “**Personal Information**” means information, including health- and non-health-related information, that can identify an individual directly or through reasonably available means. It does not include business contact information (such as work email, work phone number or work address) when such contact information is used for purposes of communicating about the individual’s job.

By providing Personal Information to Dimensions, contacting us, using our services, using the Website, or engaging with our social media, you are consenting to our use, collection, and disclosure of your Personal Information in accordance with the terms of our Privacy Practices.

3. Types of Information Collected

The type of information that may be collected is reasonably connected with the reason for collecting the information and includes but is not limited to:

- (a) **Contact information:** this information allows us to identify you as well as send you materials. It lets us communicate with you for instructions and requests. It includes your name, mailing address, email address, and telephone number;
- (b) **Payment information:** including your billing address and other banking and financial information required to complete your order;
- (c) **Date of birth:** this information allows us to establish your identity and also helps protect against error, identity theft, and fraud;
- (d) **Profile information:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses;
- (e) **Social media information:** including your name, user ID, profile picture, cover picture, username, gender, age range, language, country, friend list, and any other information you may have made public through your social media account;
- (f) **Transaction information:** includes details about payments to and from you and other details of products and services you have purchased from us, including contents;
- (g) **Marketing and communications information:** includes communication preferences and your preferences in receiving marketing from us;
- (h) **Personal information that you provide on your intake form and what you disclose to our staff and health professionals:** our staff, including professional therapists (all of whom are licensed members of the College of Registered Psychotherapists of Ontario and staff that are part of other regulatory bodies in Ontario, Canada, will collect, record, and store a variety of information for purposes of them fulfilling their obligations and providing the services required;
- (i) **Computer information:** this includes information like device type, device identifier, IP address, MAC address, location, browser type, operating system, duration of use, user behaviour, length of time spent on the services, and frequency of use; and
- (j) **Other information:** you voluntarily provide to us, our employees, or our contractors.

4. Uses and Disclosure of Personal Information

Our employees and contractors understand the importance of keeping your information private. Generally, we may use or disclose your Personal Information for purposes reasonably connected to the services you've asked for, for responding to inquiries, reason for engagement with Dimensions, and otherwise as required or permitted at law.

Without limiting the generality of the foregoing, we've listed below a few of the reasons why we may use and disclose your Personal Information.

- (a) Treatment. We may use or disclose your personal information for treatment purposes. Treatment includes diagnosis, treatment, and other services. For example, therapists may disclose your Personal Information to each other to coordinate individual and group sessions for your treatment or information about treatment alternatives or other health-

related benefits and services that are necessary or may be of interest to you. There are ethics and laws which protect the privacy of communications between a patient and a therapist. Disclosure may be necessary, should we be required to call your emergency contact, in the event that you are injured, incapacitated, or ill, or other reasons which are required or permitted at law. Please also note that we are required to report instances where an individual is going to hurt other people or themselves, or in situations where a minor is at risk.

- (b) Care Operations. We may use or disclose your Personal Information for the purposes of operations that include internal administration, planning, and various activities that improve the quality and effectiveness of care (“**Care Operations**”). For example, we may use information about your care to evaluate the quality and competence of our staff. We may disclose information to qualified personnel for outcome evaluation, management audits, financial audits, or program evaluation; however, such personnel may not identify, directly or indirectly, any individual guest in any report of such audit or evaluation, or otherwise disclose patient identities in any manner. We may disclose your information as needed within Dimensions in order to resolve any complaints or issues arising regarding your care. We may also disclose your Personal Information to an agent or agency which provides services to Dimensions under a qualified service organization agreement and/or business associate agreement, in which they agree to abide by applicable federal law and related regulations. Care Operations may also include use of your Personal Information for programs offered by Dimensions, such as sending you invitations to alumni events and workshops sponsored by Dimensions. This list of examples is for illustration only and is not an exclusive list of all of the potential uses and disclosures that may be made for Care Operations.
- (c) Other allowable uses and disclosures without your authorization, aside from treatment and Care Operations, include:
 - (i) Appointment reminders. We may contact you to send you reminder notices of future appointments.
 - (ii) Allowable disclosure for health or safety. We may disclose your Personal Information to avert or lessen a serious threat of harm to you, to others, or to the public.
 - (iii) Expanded allowable public health and health oversight activities. We may disclose your Personal Information for public health purposes and health oversight purposes including licensing, auditing, or accrediting agencies authorized or allowed by law to collect such information.
 - (iv) Expanded allowable disclosure to your legally authorized representative. We may disclose your Personal Information to a person appointed by a court to represent or administer your interests.
 - (v) Medical emergencies. We may disclose your Personal Information to medical personnel to the extent necessary to meet a bona fide medical emergency. This information might include HIV status, if applicable.
 - (vi) Capacity concerns and deceased patients. In cases where there is a question about the capacity of a patient to consent or where a patient is deceased, authorization of a personal representative, guardian, or other person authorized by applicable law may be given.

- (vii) Government authorities. We may disclose Personal Information to a coroner, medical examiner or other authorized person under law requiring the collection of death or other vital statistics, or which permit inquiry into the cause of death.
- (viii) Judicial and administrative proceedings. We may also disclose Personal Information in situations where we are legally required or permitted to do so. These situations may include criminal investigations, court orders, or instances where we believe the rights and safety of others may be at risk. We may be ordered by a court to disclose Personal Information to a third party or to the court, or to preserve Personal Information pending the outcome of a legal hearing.
- (ix) Commission of a crime on premises or against program personnel. We may disclose your Personal Information to the police or other law enforcement officials if you commit a crime on the premises or against program personnel or threaten to commit such a crime.
- (x) Duty to warn. Where the program learns that a patient has made a specific threat of serious physical harm to another specific person or the public, and disclosure is otherwise required under statute and/or common law, the program will carefully consider appropriate options that would permit disclosure.
- (xi) Audit and evaluation activities. We may disclose Personal Information to those who perform audit or evaluation activities for certain health oversight agencies.
- (xii) Service providers. We may disclose Personal Information to those entities that perform services on our behalf.
- (xiii) Fundraising communications. We may contact you to request a tax-deductible contribution to support important Dimensions activities. In connection with any fundraising, we may use certain demographic information about you and dates of health care provided to you.
- (xiv) Research. We may use or disclose Personal Information without your consent or authorization if our research privacy board approves a waiver of authorization for disclosure.
- (xv) Marketing communications. We may contact you with information about Dimensions services and products that may be beneficial to you. Such communications are a part of Care Operations, and examples of these communications are invitations to continuing care programs, alumni events, and catalogs of materials such as books, videotapes, and other items.

5. Your Individual Rights

- (a) Right to inspect your Personal Information. You may request access to your Personal Information record maintained by us in order to inspect the records. Under limited circumstances, we may deny you access to a portion of your records. If you desire access to your records and you are currently receiving services, please ask your counsellor for the records. Once you are no longer receiving services, contact the Health Information Department at healthrecords@dimensionsh healing.com.
- (b) Right to amend your records. In many instances, you have the right to request that we amend Personal Information maintained in your file or billing records when the information we have is not accurate. When we “amend” a record, we may append information to the original record, as opposed to physically removing or changing the original record.

- (c) Right to receive an accounting of disclosures. Upon request, you may obtain a list of instances that we have disclosed your protected health information. If you request an accounting more than once during a twelve (12) month period, there will be a charge. You will be told the cost prior to the request being filled.
- (d) Right to receive notification of breach. You will be notified in the event we discover a breach has occurred such that your protected health information may have been compromised. A risk analysis will be conducted to determine the probability that protected health information has been compromised. Notification will be made no more than 60 days after the discovery of the breach, unless it is determined by a law enforcement agency that the notification should be delayed.
- (e) Right to opt out. For all collection, uses, and disclosures of Personal Information that are not reasonably necessary to provide the service or products you requested, you have a right to opt out of such information-handling practices subject to certain restrictions. The instructions for how to opt out are set out below in Section 11 “Opting Out”.

6. How We Collect Information

Personal Information may be collected in a number of ways, including by our staff, through our Website, in person, over the phone, by mail, by email, by social media, and from third parties whom you have authorized to disclose Personal Information to us.

We generally do not track your digital footprint; however, if you click on an advertisement for Dimensions, pixels/cookies are used to link that advertisement to our booking engine. Pixels/cookies are small text files inside your computer that contain a unique identifier, allowing us to recognize you. This helps us tailor our content to meet your needs. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Website. By accepting cookies and continuing to visit or use our Website, you are agreeing to the use of cookies and similar technologies for the purposes we describe in our Privacy Practices.

Cookies can be used to: (i) recognize you when you visit the Website, remember your preferences, and give you a personalized experience that’s in line with your settings, (ii) make your interactions with the Website faster and more secure, and (iii) bring you advertising and customized experiences through personalization. Further, cookies are used for authentication, security, and research.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit wikipedia.org, allaboutcookies.org, or aboutcookies.org.

7. Protecting Your Personal Information

Our employees and contractors understand the importance of keeping your information private. All employees and contractors are expected to maintain the confidentiality of Personal Information.

We use reasonable measures to ensure your Personal Information is protected, whether recorded on paper or electronically, and care is used in its storage and destruction with the goal of preventing unauthorized access while under our control.

Despite all of the foregoing security measures, online storage and online communications are not entirely secure. We encourage all individuals to provide only the information they are comfortable providing to a third party, keep watch for communications that are suspicious, and report any suspicious activity to us as soon as possible. As a community, we can all help keep it safe.

8. Document Retention and Destroying Personal Information

We retain Personal Information for such period of time as is reasonably necessary to provide the services or communication to which you've agreed and for a reasonable period of time thereafter, including the expiration of limitation periods on claims that may be brought. Further, subject to needs to retain records as required or permitted at law, including the right to protect the legal interests of our patients and Dimensions: (i) in accordance with the College of Registered Psychotherapists of Ontario Practice Matters, records need to be kept for ten (10) years from the last interaction with the client or from the client's 18th birthday, whichever is later; and (ii) financial records, appointment and attendance records will be kept for five years. When the time period for keeping the record has expired, the records will be destroyed.

9. Accuracy

We make every reasonable effort to keep your Personal Information as accurate, complete, and up-to-date as necessary. We encourage you to verify the accuracy and completeness of your Personal Information in our records.

Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file, we will remedy any such errors on a timely basis. In the event that inaccurate information is mistakenly sent to a third party, we will communicate relevant changes to the third party where appropriate.

10. Governing Law

Our Privacy Practices and all related matters shall be interpreted and construed in accordance with the laws of the Province of Ontario and the applicable federal laws of Canada.

11. Opting Out

You may withdraw your consent for our use and collection of your Personal Information at any time; however, this may limit our ability to provide services or products to you, if applicable.

To withdraw consent, please contact our Privacy Officer, as set out at the end of our Privacy Practices. Any withdrawal of consent will apply thereafter and not to information-handling practices that have been previously undertaken based on prior consent.

You may opt out of use of cookies through your browser settings.

12. Personal Information Outside of Canada

We use service providers, such as cloud hosts, who may process and store Personal Information outside of Canada. You acknowledge and agree that, as a result, your Personal Information may be processed, used, stored, or accessed in other jurisdictions and may be subject to the laws of those jurisdictions, including the rights of law enforcement and government authorities to access your Personal Information.

13. Effective Date and Changes to Our Privacy Practices

- (a) Effective date. These Privacy Practices are effective on November 7, 2021
- (b) Right to change terms of these Privacy Practices. We endeavour to offer new products and services and stay current with the laws governing the protection of Personal Information. With that in mind, we may change the terms of these Privacy Practices from time to time. If we change these Privacy Practices, we will post the new Privacy Practices in public access areas at our service sites and on our Website. The new terms of the Privacy Practices will take effect from the date we post the notice of such changes and as indicated

in the effective date in 13(a) above. You may also obtain any new Privacy Practices by contacting the Dimensions Privacy Officer.

14. Privacy Officer and Contact Us

We have a designated Privacy Officer who is responsible for maintaining and implementing our Privacy Practices. If you have any questions about what Personal Information we collect on you, how we use your Personal Information, to whom we disclose your Personal Information, or other questions about our Personal Information handling practices, please contact us at privacy@dimensionsh healing.com.

We are happy to provide you with a copy of our Privacy Practices and to discuss any of its contents with you.

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