

Privacy Policy

Nazca Health Corporation (“Nazca Health”, “we”, “us”) prioritizes the privacy and security of your information. This Privacy Policy outlines how we collect, use, disclose, and safeguard your personal information and Protected Health Information in relation to our virtual healthcare services and wellness services.

Definitions

The Nazca Health Platform refers to the website, content, products, and services which allow us to provide Initial Consultations, Healthcare Services, and Wellness Services (collectively, “Virtual Appointments”).

An Initial Consultation is your first interaction with one of our team members. During this session, you will have the opportunity to discuss your health and wellness goals, concerns, and any specific issues you would like to address.

A Clinical Care Session refers to the virtual appointment conducted between a client and one of our Service Providers.

Service Providers refer to the collective team of Healthcare Providers and Wellness Practitioners.

Healthcare Services refer to the clinical interventions and treatments provided by our Healthcare Providers who are licensed with provincial regulatory bodies. These services include *psychotherapy, clinical counselling, registered nursing, dietitian services, naturopathy, speech-language pathology, and occupational therapy.*

Wellness Services encompass a broader range of practices and approaches offered by our Wellness Practitioners that promote overall mental and emotional well-being. These services include *personal training, mindfulness training, life coaching, and speech coaching.*

Services include Healthcare Services and Wellness Services.

Information means, collectively, “Personal Information” (as defined by the *Personal Information and Electronic Documents Act*, SC 2000, c 5, and its successor legislation) and “Personal Health Information” or “PHI” (as defined by the *Personal Health Information Protection Act*, 2004, SO 2004, c 3, Sch A, and its successor legislation).

A Client is an individual that has completed an Initial Consultation and has a profile created within the Nazca Health Platform.

Content refers to all information, data, text, images, and other materials available on the Nazca Health Platform. Access to our Content is not a substitute to Healthcare Services or Wellness Services and should not be treated as such.

Capitalized terms not defined in this Privacy Policy have the meanings ascribed to them in our Terms of Use.

You agreement with Nazca Health

By using the Nazca Health Platform to obtain Services, you agree to the terms outlined in our Terms of Use.

If you are a Service Provider, your arrangement with Nazca Health—your rights and obligations and those of Nazca Health—is set out in the agreement between you and Nazca Health or, if you are providing Services on behalf of a third party organization

that has contracted with Nazca Health, in the agreement between you and the third party organization with which you are associated.

Application of this Policy

This Privacy Policy applies to all individuals utilizing the Nazca Health Platform, including clients and Service Providers. This Privacy Policy outlines Nazca Health's approach to handling Information including the reasons for collecting, utilizing, and sharing such information, as well as the precautions taken to safeguard it. This Privacy Policy does not cover the collection, utilization, retention, disposal, destruction, or protection of Information by Service Providers using the Nazca Health Platform. Service Providers who offer services to Clients through the Nazca Health Platform bear legal responsibility for the Information they collect, use, disclose, and store via the Nazca Health Platform.

By using the Nazca Health Platform, you understand that Nazca Health is not a health information custodian (as defined by PHIPA). Nazca Health acts as an agent in respect of your Information.

Collection and use of Information

When you engage in healthcare services and wellness services at Nazca Health, we collect the following Personal Information: name, email address, phone number, gender identity (and other demographic data), date of birth, province/territory in which you reside, your emergency contact's name and contact information, and payment information. We collect your PHI from you directly.

We collect and use your Personal Information/PHI to connect you with Service Providers using the Nazca Health Platform.

Our Service Providers use your Information to deliver Services and to provide accurate clinical assessments and treatment plans. Services may also involve receiving, reviewing, and electronically uploading test results to the Nazca Health Platform, obtaining referrals for consultations with specialists, and collection of information required for scheduled appointments such as information about your insurance provider. Please contact us for more information on how our Service Providers use your Information.

Service Providers may, but are not required to, contact your emergency contact if they believe that you are presenting with a healthcare emergency. You are responsible for advising your emergency contact that you are providing their name and contact information to Nazca Health and Service Providers, and for obtaining any necessary consent from your emergency contact for the provision and use of that information in connection with the Nazca Health Platform

In addition to Healthcare Services and Wellness services, Nazca Health may offer other services such as educational content and group classes. When registering for these services, Nazca Health collects your name, email address, phone number, gender identity (and other demographic data), date of birth, province/territory in which you reside, your emergency contact's name and contact information, and payment information. This information is used to run these additional services and to help Nazca Health improve our offerings, understand user preferences, and develop more relevant and effective content.

Nazca Health may engage third-party vendors and software services to assist with various aspects of our services, such as payment processing, data storage, analytics, and marketing. These third-party vendors may collect and use Information on our behalf, but we require our third-party vendors to limit their use of Information to what is necessary for their services. We uphold strict protocols to safeguard the privacy of PHI, and do not share PHI with third party vendors.

Nazca Health uses Information to the extent necessary to develop, evaluate, improve, provide, and support the Nazca Health Platform and its various services. We may also

use Information for loss prevention, to prevent fraud, and to comply with legal requirements. We do not collect or use Information if non-identifying information will suffice. We do not record the audio or video portions of Virtual Appointments.

Nazca Health's Disclosure of Information

Emergency Contacts and Emergency Services. Nazca Health may disclose Information to as well as to emergency contacts in compliance with this Privacy Policy. In situations where your health or safety is at risk, Nazca Health may disclose your information, including your emergency contact details, to appropriate healthcare professionals, emergency responders, or authorized personnel as necessary to ensure your well-being and provide you with the required assistance.

Third Parties. With your explicit consent, Nazca Health may share your information with third-parties such as your insurance provider or family members for the purpose of facilitating payments and coordinated care.

Compliance, Fraud Prevention. We disclose Information to the extent required to comply with Applicable Law, including to respond to a subpoena, order, or similar obligation to produce information; and to establish or exercise Nazca Health's legal rights, including to defend against legal claims and to detect, investigate, suppress, prevent or take action regarding illegal or prohibited activities, such as suspected fraud and threats to the reputation or safety of any person.

Business Transaction. In the event of business transactions such as mergers, acquisitions, or asset sales, Nazca Health may transfer or disclose your information to relevant parties involved in the transaction. We will advise that any party acquiring

your data adheres to data protection standards and continues to safeguard your information as outlined in this Privacy Policy.

Retention of Information

We retain your Information for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by applicable laws. If you wish to obtain a copy of your clinical record, you must submit a formal request by filling out a Clinical Record Request form and submitting it to us by email at contact@nazcahealth.com.

In most cases, unless we notify you otherwise, we will retain your Information on the Nazca Health Platform until you (or Nazca Health) close your Account. On termination, for a limited time, you will be able to print or copy your Information held in the Nazca Health Platform, except for any private notes of Service Providers. Any request for access to a Service Provider's notes should be made directly to the Service Provider outside of the Nazca Health Platform.

Your Service Provider may, as permitted by their applicable legislation and the rules of their governing body, retain notes or other information pertaining to the Services they provided. Nazca Health does not have access to such notes or information, and any request for such notes or information must be submitted directly to the Service Provider. If you are having trouble finding the Service Provider you received Services from, email us contact@nazcahealth.com.

After the time period during which you may print or copy your Information has ended, we will securely delete the Information associated with your account, except for any Information that Nazca Health is required to retain under applicable law or Information required by a Service Provider in connection with Healthcare Services. Nazca Health will delete the latter once the Service Provider makes a copy of the Information or terminates their account with Nazca Health. When Information is deleted, it is removed from our active database. Any Information that remains in our backup is securely stored and isolated from any further processing until deletion is possible.

Safeguarding Information

We permit Nazca Health team members (“Team Members”, which include our employees and independent contractors) to access Information only to the extent necessary to perform their designated functions.

Nazca Health employs commercially reasonable safeguards commensurate with the sensitivity of the Information, which protect against data loss and compromise, and protects the integrity of data. Nazca Health contracts electronic medical record-keeping and data storage to a third-party service provider. Information is stored on secure servers located in separate geographic locations within Canada.

Despite the precautions we take and our dedication to safeguarding Information, we cannot guarantee the security or error-free transmission or storage of Information. There are risks inherent in the use of electronic means to transmit and hold information in electronic format. These risks can be minimized but not eliminated by the use of commercially reasonable security measures. These risks include interception, loss, corruption, unauthorized access to, use and disclosure of Information, and delay in the availability of Information.

Collection and use of non-identifiable data

Nazca Health obtains the authorization to collect non-identifiable data that pertains to your use of the Nazca Health Platform. Non-identifiable data includes but is not limited to:

information about how you interact with our website, the features you use, and the actions you take;

technical information about the device you use to access our services, and;

data that is combined with data from other Clients to create summary statistics or reports while ensuring individual identities remain hidden.

Cookies and similar technologies

The Nazca Health Platform and Nazca Health's email messages and marketing materials use cookies and other technologies such as website analytics. We use these technologies to better understand the use of the Nazca Health Platform, analyze trends, and administer, personalize and improve your experience with the Nazca Health Platform. For more information about our use of cookies and your ability to accept or decline our use of cookies, please refer to our Cookie Policy.

Links to third-party websites

The Nazca Health Platform may contain links to websites that we do not own or operate. The provision of these links is not an endorsement of or referral to the linked websites. We provide the links solely for your convenience. This Privacy Policy does not apply to the linked sites or pages external to the Nazca Health Platform and we are not responsible for the content or privacy practices applicable to them or used by their operators.

Amendments to this Privacy Policy

We reserve the right to amend the Privacy Policy at any time to account for changes in any applicable law, our practices and the Nazca Health Platform. Please check to see if we have amended the Privacy Policy since you last used the Nazca Health Platform to ensure you are aware of and agree to our current privacy practices.

Contact us

If you have any other questions about this Privacy Policy or Nazca Health's information practices, please email us at contact@nazcahealth.com