

# ABEL Website Privacy Statement

Last Updated: August 21, 2017

This Website Privacy Statement is applicable to ABELSoft Inc. and its subsidiaries ABELDent Inc. and ABELMed Inc. (“ABEL”), and describes our practices with respect to the use of information gathered through this Website. To learn more about our personal health information handling practices, please visit our [Patient Privacy Policy](#).

We encourage you to read this Privacy Statement before using our Website. By using this site, you agree to the terms contained herein, and any changes in effect at the time of use. If you do not agree to the terms of this Privacy Statement, please do not use the Website.

## 1. Personal Information Gathered on this Website

You are not required to register or provide personal information in order to access our Website, though certain functionalities (such as MyABEL) may require registration. We collect personal information from you only when you voluntarily provide it to us – for example, when you contact us using our website fill-in form with your inquiries or feedback, or when you respond to any surveys that we may launch. Personal information may include your contact information (such as your name, telephone numbers and/or e-mail address), as well as your specific enquiry.

## 2. Sharing of Personal Information

We work with third parties who provide services, including data analysis, promotional activities, and other administrative services. We may share limited user information with such third parties for the purpose of enabling these third parties to provide such services.

We may disclose your personal information if we believe that we are required to do so: (i) by law; (ii) to comply with legal process or governmental requests; (iii) to enforce a legal agreement; (iv) to protect our operations; (v) to protect legal rights, privacy, safety or property of ABEL, you or others; and (vi) to permit us to pursue available remedies or limit the damages that we may sustain.

## 3. Website Practices – Monitoring and Tracking

### *Usage tracking*

Our Website may automatically record some general information about your visit in order for ABEL to engage in web statistical analysis using Google Analytics. We want to make sure our sites are useful to visitors. This information may include the:

- Internet domain for your Internet service provider, such as “company.com” or “service.ca” and the IP address of the computer you are using to access this Website;
- Type of browser you are using, such as Internet Explorer, Firefox or Chrome;
- Type of operating system you are using such as Windows or Macintosh;
- Date and time of the visit to our site, the pages of our site that were visited, and the address of the previous website you were visiting if you linked to us from another website; and
- Age category, gender, and affinity interests as determined by demographic and interest reports available through Google Analytics.

We make no effort to personally identify you based on your visit to our site. If you wish, you may opt out of being tracked by Google Analytics by disabling or refusing the cookies; by disabling JavaScript within your browser; or by using the [Google Analytics Opt-Out Browser Add-On](https://tools.google.com/dlpage/gaoptout?hl=en) (<https://tools.google.com/dlpage/gaoptout?hl=en>)

Data collected for web analytics purposes may be processed in any country where Google operates servers, and thus may be subject to the governing legislation of that country.

### ***Cookies***

We also use "cookies" to improve your experience on our Website, to identify you as a return visitor, and to help us tailor information to suit your individual preferences. A cookie is a small text file that a website can send to your browser, which may then store the cookie on your hard drive. The goal is to save you time next time you visit, provide you with a more meaningful visit, and measure website activity. Cookies in and of themselves cannot be used to reveal your identity. Many browsers, however, allow you to disable cookie collection if you wish, or inform you when a cookie is being stored on your hard drive. If you refuse cookies, you may not be able to use certain features of this Website, or view ads based on past visits to our Website.

### ***Targeted advertising***

As you interact with this Website, third party advertising partners may use cookies that we place on your computer, tracking pixels, web beacons and similar technologies to identify you as a visitor to our Website, and present you with targeted ads to help us promote ABEL’s special promotions, products and services. You can opt-out of the use of your information for select ad targeting by visiting this site: <http://youradchoices.ca/choices>, and also by setting up “Do Not Track” options available through your browser. We also occasionally provide your personal information to trusted advertising partners for the purpose of presenting you with targeted ads on behalf of ABEL. You can request that your personal information not be shared with our advertising partners by contacting [privacy@abelhealthgroup.com](mailto:privacy@abelhealthgroup.com)

## **3. Protection of Information**

We have physical, organizational and technical measures in place to help protect against the loss, misuse, unauthorized access and alteration of the information under our control. Our Web

server and all data is stored in secure facilities that are only accessible to authorized employees on a need-to-know basis.

When logging into the MyABEL portal, your login information is transmitted by your browser in an encrypted format using industry-standard, SSL (Secure Socket Layer) encryption.

#### **4. Other Important Notes Regarding our Web Practices**

##### **a. When you are not on an ABEL Website**

###### *EXTERNAL LINKS*

This Statement outlines the privacy practices of ABEL. ABEL also provides links to other websites which we believe may be of interest to you. ABEL is not responsible for the privacy practices of these other sites. We encourage you to read the privacy policies of each and every website that requests personal information from you.

###### *THIRD PARTY SOCIAL MEDIA*

ABEL's use of social media serves as an extension of its presence on the Internet. Social media account(s) are public and are not hosted on ABEL's servers. Users who choose to interact with ABEL via social media should read the terms of service and privacy policies of these third-party platforms and those of any applications used to access them.

##### **b. Communications with ABEL**

If you consent to receiving electronic marketing and promotional messages from ABEL, you will have the option to withdraw consent at any time using the unsubscribe links in any such messages.

Note that when you send us an e-mail, we use your information strictly to respond to your message. It is important not to include any sensitive information, as e-mail travels on the open Internet and is thus not a secure method of communication.

##### **c. Special Note for Parents**

ABEL takes seriously its obligations under the *Children's Online Privacy Protection Act* concerning the collection of personal information from individuals under the age of thirteen (13). The Website is not directed at children, and we request that children under the age of 13 not provide personal information through the Website.

##### **d. EU GDPR Does Not Apply**

Note that the General Data Protection Regulation (EU 2016/679) does not apply as this Website is not intended to be used by individuals who are located within the European Union.

##### **e. Assignment**

We reserve the right to transfer any and all information that we collect from users of the Website to a third party in the event of any merger, sale, joint venture, assignment, transfer or

other disposition of all or any portion of ABEL's assets (including without limitation in connection with any bankruptcy or similar proceedings).

## **5. Contacting Us**

You may contact us at any time with questions about our Web practices, or to review your personal information as collected by ABEL, or request its destruction. Note that despite any removal of or change to personal information requested, there may be residual information that will remain within our databases and other records.

1. You may email us at: [info@abelhealthgroup.com](mailto:info@abelhealthgroup.com)
2. You may call us at 1-800-267-ABEL
3. You may send mail to the following postal mail address:  
3310 South Service Rd., Unit 101  
Burlington, ON L7N 3M6

## **6. Changes to This Policy**

We reserve the right to change this Privacy Statement, and any of our policies or procedures without prior notice. You can determine when this Privacy Statement was last revised by referring to the "Last Updated" legend at the top of this page. Any changes to our Statement will become effective upon posting of the revised Statement on the Internet, accessible through this Website. Use of the Website following such changes constitutes your acceptance of the revised Statement then in effect. We encourage you to bookmark this page and to periodically review it to ensure familiarity with the most current version of our Statement.