



Privacy Policy

V 1	July 2018	Jeff Dawley	Reviewed
V 1.1	Oct 2021	C. Yoon	Reviewed
V 1.2	Oct 2023	A. Ostritsky	Reviewed


Document Review

Date of Next Scheduled Review
Oct 2024

Distribution

Name	Title
Helen Ostritsky	CFO, Co-founder
Alex Ostritsky	CTO, Co-Founder

Approval

Name	Position	Signature	Date
Alex Ostritsky	President CTO		Oct 2023



H A L E X

Business Strength Through Information Technology

Contents

PRIVACY POLICY	3
PERSONAL INFORMATION	3
ACCOUNTABILITY.....	3
IDENTIFYING PURPOSES.....	4
CONSENT	4
LIMITING COLLECTION	4
LIMITING USE, DISCLOSURE AND RETENTION	4
ACCURACY	5
SAFEGUARDS	5
OPENNESS	5
INDIVIDUAL ACCESS.....	5
CHALLENGING COMPLIANCE.....	5



Privacy Policy

HALEX respects an individual's privacy and will only collect, use and disclose personal information in accordance with its Privacy Policy. We recognize every individual's right to privacy and acknowledge our obligation to preserve the confidentiality of personal information.

This Privacy Policy applies to HALEX in its collection, use and disclosure of personal information in the course of providing professional consulting services.

HALEX does not collect, use or disclose personal information except for the purpose of conducting its business of providing professional services to its clients. HALEX reserves the right to update its Privacy Policy at any time and such modifications shall be effective immediately, unless otherwise stated.

Personal Information

HALEX collects, uses and discloses personal information in accordance with all applicable laws and the Personal Information Protection and Electronic Documents Act ("PIPEDA") and Health Insurance Portability and Accountability Act ("HIPAA").

Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

Additional health data provided by HALEX clients are to be de-identified by the client prior to data transfer. Data transfer is performed under secure transfer conditions and only accessible by HALEX employees required to process the data. De-identified Information may be used by HALEX only for the purposes of development, product improvement, to demonstrate or market product effectiveness, or research. HALEX agrees not to attempt to re-identify de-identified Information and not to transfer de-identified Information to any party.

Accountability

HALEX is responsible for personal information under its control and has designated a Privacy Officer who is accountable for this Privacy Policy and applicable governing laws. The Privacy Officer may be contacted as follows:

Privacy Officer
HALEX
118 Tower Hill Road, Unit 20089
Richmond Hill, Ontario
L4E 0K0, Canada



H A L E X

Business Strength Through Information Technology

Identifying Purposes

HALEX will identify the purposes for which personal information is collected at or before the time it is collected. The purposes for which information is collected, used or disclosed must be those that a reasonable person would consider are appropriate in the circumstances. When HALEX uses personal information that has been collected for a purpose not previously identified, it will identify the new purpose for the individual to whom the personal information relates prior to using the information in that manner, except as permitted or required by law.

Consent

HALEX will make a reasonable effort to make sure individuals understand how their personal information will be used by HALEX. HALEX will obtain consent of the individual for the collection, use or disclosure of personal information.

An individual's consent may vary from express written consent to implied consent, depending upon the circumstances and the type of information. We will collect, use or disclose personal information without consent, only where permitted or required by law.

Subject to legal or contractual restrictions, an individual may withdraw their consent at any time, by providing reasonable notice and will inform the individual of the implication of such a withdrawal, if any.

Limiting Collection

HALEX limits the collection of personal information, both the amount and the type of information, to that which is necessary for the purposes identified by HALEX. HALEX collects personal information by fair and lawful means and for purposes that a reasonable person would consider appropriate in the circumstances. HALEX does not use cookies, Web Beacons or other technologies to collect identifiable personal information from visits to our website.

Limiting Use, Disclosure and Retention

HALEX uses and discloses personal information only for purposes related to employment and employment opportunities. HALEX will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information that is used to make a decision about an individual will be maintained for a minimum of two years of time to allow the individual access to the information after the decision has been made.

HALEX may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where HALEX has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court or otherwise as permitted by applicable law.

Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, HALEX will ensure that the hard drive is physically destroyed.



Accuracy

HALEX will venture to ensure that personal information will be accurate, complete and up to date as is necessary for the purposes for which it is to be used.

Safeguards

HALEX protects personal information by security safeguards appropriate to the sensitivity of information. We are committed to keeping personal information secure, and have appropriate technical, administrative and physical procedures in place to protect personal information against loss or theft, as well as authorized access, disclosure, copying, use, modification, disposal or destruction.

In addition, methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

We limit access to personal information to those who have a business need. We keep personal information only for a reasonably needed amount of time.

Openness

HALEX will make available to individuals' specific information about its policies and practices relating to the management of personal information. All questions or enquiries about this Privacy Policy or our personal information management practices are to be directed to our Privacy Officer.

Individual Access

When a request is made to HALEX, we will inform an individual of the existence, use and disclosure of their personal information and provide access to that information, except where access is not required by law. Upon request, individuals can review the accuracy and completeness of their personal information and may have it amended, if appropriate.

Challenging Compliance

Any questions about our Privacy Policy are to be directed to our Privacy Officer. We will inform individuals who make inquiries or lodge complaints about our procedures, and we will investigate all inquiries or complaints. We will notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the issue, including any amendments to our policies and procedures

Business Strength Through Information Technology
