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1. What are consumer-based virtual health services?

Ontario Telemedicine Network – OTN for short – saw the need to bring together a set of health services directly to you, the consumer. OTN does this through your device (computer, smartphone etc.) when you visit OTN.ca. Some of these services are managed by OTN and others are managed by other organizations. The following are OTN programs and/or services you can find by visiting OTN.ca:

- eVisit for patients to set up appointment with health care providers

- Ontario Virtual Clinic (eVisit)

- Chronic obstructive pulmonary disease (COPD)

- Support for patients with heart failure monitoring and coaching

- Retinal Screening for Diabetics

- Get Specialist Advice with the Wait (eConsult)

- Indigenous Services connects First Nations patients with culturally sensitive primary, specialized and urgent care.

The following are non-OTN services you can find by visiting otn.ca:

- Other consumer health services:
    - ✓ CANImmunize offered by the Ottawa Hospital.
    - ✓ Problem Gambling Support offered by Centre for Addiction and Mental Health-Ontario.
    - ✓ BounceBack, for mental health support, offered by the Canadian Mental Health Association.

    These are services delivered by parties other than OTN. They have their own privacy policies and terms and conditions for using their services. You need to check out the privacy policies and terms and conditions of use for all these non-OTN services. A link to their privacy policies can be found in Question 7.

- Google services run in the background. Google Analytics and Google Tag Manager collect usage data from your device. OTN uses that data to improve services. You need to read Google's privacy policies because Google uses the same data to put ads on your screen. If you want to opt out of Google Analytics see Question 9.

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2. What 'personal information' (PI) is being collected through OTN.ca and consumer-based services?

- Each consumer-based service needs to collect basic personal information. For OTN services we will ask only for your postal code to make sure you live in Ontario, your name and email address. There is a chart (see Question 14) that lists the pieces of personal information that is collected on the OTN website. The list can change, so check it periodically.

- For OTN Telehomecare services such as COPD or CHF that you use, your personal information will be faxed to your Local Health Integration Network (LHIN)1 when the service is available. The LHIN needs the information so that they can connect you to the Telehomecare program you have requested. When the service is not available, OTN will keep your personal information so we can contact you when one is available.

- The Chart in Question 14 also shows personal information collected by non-OTN consumer health services, but that PI is collected on each service's respective website, not on OTN.ca.

- There is other information that your device generates as it communicates through OTN.ca, which is used to serve you directly and improve service. This information is not personal information and is generally about your use of OTN.ca services, such as the browser you use (such as Google, Firefox, Safari, etc., that let you navigate the Web), your IP address (a number identifying your device or router on the internet, as well as your service provider and sometimes your location), and your operating system (Mac OS, iOS, Windows, Android, Linux, etc.).

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[1] **LHINs** are community-based, non-profit organizations funded by the Ministry of Health and Long-Term Care to plan, fund and coordinate services delivered by: Hospitals. Long-Term Care Homes.

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3. Why is OTN.ca collecting all this information?

There are two reasons to collect your personal information.

- First, the consumer-based health services on OTN.ca needs to connect to you individually and communicate with you in some way, through email, or the browser you use on your device in order for you to use the service.

- Second, OTN.ca services are always looking for ways to improve and add services, not to mention getting enough funding so that you can use the service for free. So OTN.ca has to undergo some analysis. For instance, what if one of the services is used a lot to start but, hardly anyone stays with the service more than 6 months. We need to identify if there is a problem to fix it. That's where device-generated information comes in handy (see Questions 11, 12 & 13). But be assured before OTN uses this information it makes sure any personal identifiers are removed so that the information is no longer tied to you. In some instances, you are giving us information so that OTN can connect you to OTN services.

4. Do I have a say whether OTN.ca collects my 'personal information' or not?

- You get to choose if you want to use a service on OTN.ca. The service is free, and you are free to use it or not. But the decision to use a service means there are a few pieces of personal information you have to give for the service to be provided.

- It's a good practice to go through a service's privacy policy[2] and its terms and conditions of use before you use the service. Every OTN.ca service is designed to let you browse that information prior to giving out any personal information.

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[2] See Question 7 for a link to all privacy policies for the various services found on OTN.ca.

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5. Who is using my 'personal information' and what are they doing with it?

To begin, OTN never sells or exchanges your personal information with 3rd parties. That leaves a handful of people from three groups of users that can see and use your personal information.

1. The first is OTN staff that manage OTN.ca. They use your personal information[3] so that you get the service you expect. OTN staff also use information created from the connection between your device and the service(s) you choose through web-based services: Google Analytics and Google Tag Manager. Staff do not see your name, age or email but they will see your computer's address, called an IP address and your device's activities as you browse and use OTN.ca. OTN uses information from Google to make OTN.ca run better and let more people know about OTN.ca services.

2. To understand the second set of users, we have to step back a minute. OTN.ca is a focal point for various consumer health services. In other words, there are lots of services you can get through OTN.ca. Some are things OTN offers directly, like Heart Failure and Monitoring, others, like Problem Gambling Support are run by the Centre for Addiction and Mental Health (CAMH). These non-OTN services are using your personal information to connect and communicate with you and to ensure you receive the service you chose.

3. Third there is DISQUS. OTN uses this service to get your feedback on what you want to see when it comes to using technologies to better your health care. DISQUS will hang on to whatever you send through them. Just so you know. See Disqus Terms of Service and Disqus Privacy Policy. All these external services have privacy policies. These services also have terms and conditions of use statements. It is your responsibility to read them. OTN is not responsible for how other Websites connected through OTN.ca use your personal information

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[3] Please see Question 14 which charts all the personal information collected by OTN.ca website.

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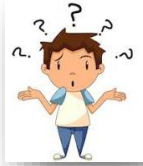
6. What should I know about these 'external' services?

- First off, you should know that OTN provides these services 'as-is'. We don't certify how they protect, use or share the personal information you give them. So, read their Privacy Policies and Terms and Conditions of Use. This applies to CANImmunize, Problem Gambling Support, Big White Wall and BounceBack.

- Second these external services collect other information from users (e.g., number of users, number of users that came through OTN.ca, number site visits, average number of visits per user, length of time on a site and on a page, when users generally log on). OTN uses this information from these external services to see how OTN.ca is being used, so that we can show the Ontario Ministry of Health and Long-term Care and the Local Health Integrations Networks what works and what needs improvement.

7. What are the current services on OTN.ca and what are the privacy notice links to each service available through OTN.ca

- COPD Monitoring and Coaching
  - These questions and answers you are reading make up the privacy notice.
- Heart Failure Monitoring and Coaching
  - These questions and answers you are reading make up the privacy notice.
- eVisit
- Mental Health Support:
  - [BounceBack](#)
  - [Immunization Awareness and Support (CANImmunize)](#)
  - [Problem Gambling](#)

8. How does OTN and the 'external services' protect the 'personal information' I input through OTN.ca?

- OTN has a whole range of protections to make sure your personal information is not misused and only looked at by authorized personnel for approved reasons. First off, your personal information is encrypted when it is sent to OTN and stays encrypted when it is stored in a secured data centre. Access to the data is technically and physically limited and requires prior authorization. As well, OTN limits the 'processing' of your information to the purpose for which your personal information was collected in the first place. Processing covers any activity that takes place on your personal information from just looking at, to combining it, with other data to find ways to better serve you.

- CANImmunize and Problem Gambling Support that you find on OTN.ca are not OTN services. They each have a set of privacy policies and protections in place. You will find that those services also restrict access and limit how they use your data. You need to read their privacy policies.

- OTN uses Google tools to analyse your computer-generated information; this is generally not personal information (see [Question 11](#) for more detail). OTN uses this data to find ways to serve you better. It is best you review their privacy policies. OTN takes no responsibility for their activities.

DISQUS captures and keeps all comments you make using their tool. You need to read their [privacy policies.](#)

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9. Who do I contact if I want to see my 'personal information,' find mistakes, want to complain or have your personal information removed[4]?

- For OTN services send OTN an email to OH-OTN-Privacy@ontariohealth.ca or contact us at 1-855-654-0888.

- For non-OTN services you can find their privacy contact information on their websites (See Question 7 for links). If you run into a problem having your request answered from a non-OTN service on OTN.ca, contact our OTN privacy team as noted above. We're here to help.

- Non-OTN services each have a policy for the steps you can take to stop using their service and if and how you can delete any personal information you have given to that point. See Question 7 for links to the privacy policies for more detail.

- If you wish to opt out of Google Analytics data collection, follow Google's instructions on downloading and installing the "Google Analytics Opt-out Browser Add-on".

10. What can I do to protect my 'personal information' when I use OTN.ca services?

- Input the least personal information through your device that is necessary to use the service you need.

- Limit the amount of personal information stored on your devices and delete PI when no longer needed.

- Avoid giving any personal details in areas where you can make comments (like on the BWW).

- Password protect the device(s) you use to access OTN.ca. For smartphones activate the ability to remotely wipe your device if you lose it.

- Avoid accessing OTN.ca services in public places and over unsecured (e.g., Tim Hortons) WIFI networks.

- Keep control of your devices (don't leave them unattended, in a car, a coffee shop).

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[4] Having your PI deleted means that you likely won't be able to continue to use or receive that service.

- Install up to date, reputable, anti-spyware and anti-virus scanners and make sure you understand and use your firewall settings.

- Keep a copy of your various devices', makes, models and serial numbers in case of loss or theft to aid in blocking unauthorised use.

- Activate 'find my device' apps if available to allow you to track lost or stolen devices.

- Before selling or disposing of a device or USB key delete all PI (this requires more than just hitting the delete button, see: How to wipe a computer clean of personal data

- Take some time to read through the privacy policies for each OTN.ca service before you use them

11. Is there more I need to know about Google?

- OTN uses "Google Analytics" and "Google Tag Manager," a web analysis service provided by Google. that provides us with information about the Website and use of the Website that we use to improve the functionality of the site to make information about our telemedicine services more easily and widely available. Google collects cookies and usage data and processes such information in the United States.

- Google Analytics may set or read cookies on the browsers of Website users and otherwise receives information from users' browsers. Google utilizes the data collected to track and examine the use of the Website, to prepare reports on those activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. For more information on Google's use of information collected through Google Analytics, please consult Google's privacy policy, and the section of the privacy policy entitled "How Google uses data when you use our partners' sites or apps".

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12. What information that is not personal information is collected when I log onto and use an OTN.ca service?

The following non-identifiable information is collected:

- o Technical data: your IP address, cookie IDs, your device ID, log-in information, the browser you use, your time zone and location, any plug-ins you added to your browser (e.g., ad blocker), your operating system and other technologies running on your device.

- o Profile data: your username, password, interests based on you browsing, preferences, marital status, gender.

- o Usage data: number of registrations to the self-managed virtual care tool that originated from OTN link clicks, number of site visits, total sessions, average number of sessions per user and session duration, average time on page, unique page views, hour of the day visited, and total number of post-login site visits to the self-managed virtual care tool including registration page visits.
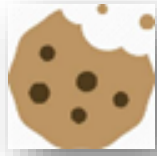
13. What are cookies?

- Cookies are messages that pass between the browser (e.g., Google) you use on your computer or phone and internet sites that you go to. In this case the services you go to on OTN.ca. The messages are stored in your browser. The information is generally technical (e.g., your IP address, the browser you use, domain names, time stamps for when you access a service). But it can be used to figure out some personal information about you. To find out more see: the Privacy Commissioner of Canada's report.

- OTN needs to use cookies to make it easy for you to pick up where you left off in OTN.ca. No point starting from scratch. Some of the cookies we use disappear when you exit OTN.ca. Others are persistent. They stay on your computer and get used to help you navigate OTN.ca each time you return. You can remove persistent cookies by following directions provided in your Internet browser's "Help" file. You can also set your browser to disable cookies, but this Website may not function properly if you do.

- OTN does not disclose Technical Information except as required by law.

- Each of the non-OTN services have policies regarding cookies. **You need to read them.**

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14. Chart showing personal information collected on OTN.ca website.

Service Name	Data Collected					
	First, Last Name	Date of Birth	Street Address	Postal Code	Email Address	Telephone #
eVisit	No PI collection through OTN.ca. Data collected through OTNhub.ca					
Ontario Virtual Care Clinic (eVisit)	Only IP address collected					
Manage COPD	Yes	No	No	Yes: to see if service is available.	Can be provided by consumer at their discretion if service is available	Yes: if service available
Manage Heart Failure	Yes	No	No	Yes: to see if service is available	Can be provided by consumer at their discretion if service is available	Yes: if service available
Retinal Screening for Diabetics (Teleophthalmology)	Yes	No	No	Yes: to see if service is available	Can be provided by consumer at their discretion if service is available	Yes: if service available
Get Specialist Advice Without the Wait (Ontario eConsult Program)	No PI collection through OTN.ca. Data collected through OTNhub.ca					
Indigenous Services	No	No	No	No	No	No
Virtual Palliative Care Program	No PI collection through OTN.ca					

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	Personal Information Collected by 'Consumer-Managed' Services: Non-OTN on OTN.ca website						
Service Name	**Data Collected**						**Notes**
	First, Last Name	**Date of Birth**	**Street Address**	**Postal Code**	**Email Address**	**Telephone #**	
Mental Health Support: BounceBack	No	No	No	No	No	No	No PI collected through OTN.ca website. BounceBack does collect email address. If using the telephone coaching service, a physician referral form captures name, gender, mailing address, phone #, email.
CANImmunize (Immunization Awareness and Support)	No: Collected on CanImmunize website	No: Collected on CanImmunize website	No	No: Collected on CanImmunize website	No	No	No PI collected through OTN.ca website. CanImmunize Website collects email address, gender, age, province of residence.
Problem Gambling Support	No: collected on Problem Gambling Website	No: Collected on Problem Gambling Website	No	No: Collected on Problem Gambling Website	No: Problem Gambling directs consumer to create non-identifying email address.	No	No PI collected through OTN.ca website. Problem Gambling Website collects email address, date of birth, gender, racial ancestry, province of residence.