

## **Privacy Policy**

The Montreal Heart Institute (“we”, “us” or “our”) has created this Privacy Policy to explain how it processes and safeguards Personal Information in connection with the use of the Website. Anyone can [contact](#) us for any questions, comments or requests about this Privacy Policy.

### **WEBSITE INTENDED USERS**

**THE WEBSITE ACCESS IS INTENDED FOR USE ONLY BY INVESTIGATORS, STUDY COORDINATORS CENTERS OR SPONSORS. THE WEBSITE IS NOT INTENDED AND SHALL NOT BE USED BY CHILDREN AND OTHER USERS, AND WE DO NOT KNOWINGLY PROCESS INFORMATION ABOUT CHILDREN AND SUCH OTHER USERS.**

**This Privacy Policy shall be reviewed carefully as it governs the access and use of the Website.**

**We may change this Privacy Policy from time to time as detailed [below](#). Should anyone object to any changes made, he/she shall stop using the Website. By continuing to use the Website after the amendment of this Privacy Policy, he/she will be deemed to adhere to its terms, as amended. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.**

## 1. [INTRODUCTION](#)

We are committed to protecting the privacy of Personal Information, and take the protection of data privacy very seriously. In this regard and in order to bring to your attention the privacy practices implemented, we have prepared this Privacy Policy, which summarizes: **(i)** the types of Personal Information collected, **(ii)** why we do it; **(iii)** how we use and protect it; and **(iv)** under what circumstances it could be shared when required or permitted under applicable law. This Privacy Policy further describes the decisions that can be made with respect to the processing of your Personal Information. **Click on the links below to jump to the different sections of our Privacy Policy:**

- [Definitions and Interpretation](#)
- [Collection and Use of Personal Information](#)
- [Sharing of Information Collected](#)
- [Security](#)
- [Storage of Personal Information](#)
- [Right of Accessing and Other Rights Third-Party Websites](#)
- [Contacting us](#)
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## 2. DEFINITIONS AND INTERPRETATION

**2.1 Definitions.** In this Privacy Policy, the terms set forth below have the following meanings:

- **Cookies** designates the small text files that are placed on devices when using/accessing the Website.
- **Personal Information** means any information about an identifiable individual, such as your name and contact information (e-mail and phone number) and Internet Protocol address.
- **we** (or similar words) designates the Montreal Heart Institute, a corporation duly constituted under Part III of the *Companies Act, CQLR c C-38* and located at 5000 Belanger Street, Montreal (Quebec) H1T 1C8 CANADA.
- **Website** means the website available at mhicc.org or any other URL, as may be applicable from time to time.
- **you** means any individual located in a country, province or territory who wishes to navigate on the Website to learn more about our studies and services.

**2.2 Interpretation.** Unless the context requires otherwise: **(i)** grammatical variations of any term defined herein have a similar meaning; and **(ii)** words importing the singular number shall include the plural and words importing the masculine gender shall include the feminine and neutral genders and vice versa.

## 3. COLLECTION AND USE OF PERSONAL INFORMATION

This Website has been developed to assist in presenting different studies and services. Should you use the Website to establish a first contact with us, then you will need to disclose a limited amount of Personal Information. Other information may also be collected directly from you or by automated means when you use the Website, as further described below. In all cases, such Personal Information is only collected and used and processed for the purposes detailed in this Privacy Policy, subject to applicable laws, and will not be used/processed for a different or incompatible purpose without your knowledge and, where required by law, consent.

### 3.1 Information obtained directly from you

#### 3.1.1 Voluntary communication by you to learn more about our studies and/or services

The Website provides initial information about different studies and services. In this regard, the main feature of the Website is its e-mail feature allowing you to send us an e-mail request to be re-contacted by us,

should you be interested in taking part in our studies as investigators or participating sites or interested in our services as investigators, study coordinators centers or sponsor. In such a case, you will be required to disclose only that information (namely, your name, phone number and e-mail) required for us to re-contact you. You may provide additional information (such as any message), which facultative information will be reviewed as well by our staff if provided. Your coordinates (and other information, if any) will only be used for that purpose.

### **3.1.2 Comments and requests for information**

Should you contact us to obtain information about the Study or about any other matter, then you will be required to provide your contact information (e.g. names and e-mail). This information is required by us in order: **(i)** to categorize the communication; **(ii)** communicate with you; and **(iii)** respond to your enquiries or otherwise process the request (e.g. investigate any breach of the Privacy Policy or other applicable terms and conditions) or response to your questions/comments.

### **3.1.3 Social media**

We may share information about ourselves, our services and our Study on social media. Similarly, if you send or accept our “friend request” or otherwise “follow” us, then you will share the information that you and your “friends” or “contacts” posted on their pages and we may consult it. Since social media users can choose the audience that can see what they share via their privacy settings or the audience selector, you will be considered as having agreed to share such information with your “friends” or persons you “follow” as described in the privacy policy and terms of use of each social media platform. Should we collect information available on social media accounts or pages, we will do so on an aggregate and de-identified basis and for lawful purposes only. Note that our intended use of social media is not to learn, be added by or to follow patients, but rather to learn more about potential participants’ pools, to identify prospective jurisdictions, and to assess the interests of the population.

## **3.2 Information collected using Cookies and similar technologies**

When you use the Website, certain information, including Personal Information (such as general browser information, Internet Protocol addresses, the interactions with the Website and any other information described below) may be collected by automated means, such as through the following types of Cookies:

- Process Cookies: allow the Website to work properly ensuring the integrity of web pages and allowing you to browse from one page to the other;
- Preference Cookies: allow our Website to remember information that changes the way it behaves or looks;
- Statistical Cookies: collect data, such as the date and time when the Website were last used and the frequency of such uses, the pages or content consulted and the manner the Website was used, the information provided and the features of their operating systems and connection information (e.g. Internet Protocol address). This information is collected for analytical and statistical purposes, such as for the purposes set forth in [point 3.3](#) below.

Other forms of technologies can also be used for similar purposes.

Cookies and other forms of technologies can be blocked. Anyone experiencing problems with the functionalities of the Website should [contact](#) us. You can take the following steps to block Cookies and other forms of technologies: **(i)** for Google Analytics, click [here](#); **(ii)** for Hotjar cookies, click [here](#); likewise, some web browsers may be configured to send 'Do Not Track' signals to the websites that you visit. While there is no consensus among industry participants as to what 'Do Not Track' means in this context, the Website – like many websites – does not alter practices when a 'Do Not Track' signal is received from a visitor's browser. To find out more about 'Do Not Track', please click visit [here](#). Because we link to social media sites (as mentioned [above](#)), and which from time to time may include third-party advertisements, other parties may collect your personally identifiable information about your online activities (e.g. your IP address) over time and across different web sites when you visit the Website. Please note that not all tracking will stop even if you delete Cookies.

## **3.3 Information obtained from Google Analytics and Hotjar Ltd**

Google Analytics can collect data about the interactions with the Website. Such information will then be processed and be updated every time you (or any person) interact with the Website, which will allow Google

Analytics to see which information was consulted, the browser used, device and operating device. The statistical and other aggregated information so collected may be shared (in whole or in part) with us in order for us: **(i)** to update, upgrade or otherwise improve the Website, or to develop new features; and **(ii)** to help us to know how many users we have, which parts of our Website are most popular, what browsers are used, the country or region where our users are located, and the demographics and interests of our users (so we can maximize compatibility). This enables us to better understand who is using our Website and to improve it. Google Analytics cookies may retain information for up to two years. For more information about Google Analytics services, please click [here](#).

Likewise, we use Hotjar cookies from Hotjar Ltd to help us better understand how you (and other persons) use the Website and how we can improve the Website through a range of tools such as heat maps, feedback polls and surveys. For more information, click [here](#).

#### **4. SHARING OF INFORMATION COLLECTED**

We do not sell, trade or otherwise share Personal Information for commercial means. Furthermore, Personal Information is not shared, used or disclosed to third parties for purposes other than those for which it was collected as described herein, unless required or authorized by law or unless proper consent was obtained, as applicable.

##### **4.1 Personal Information**

Personal Information may be used and disclosed if we, acting reasonably, believe that such use, disclosure or other process is allowed or necessary to comply with applicable laws, legal process or governmental request, or is otherwise required to protect our rights or to fulfil any other purpose set forth in applicable law allowing or requiring the disclosure of Personal Information, including disclosures: **(i)** to enforce the Privacy Policy; **(ii)** to respond to claims that any information you provide violates the rights of third parties; **(iii)** to protect the rights, property, or personal safety of us, our users and/or the public; or **(iv)** in relation to the merger or other form of reorganization of the health and social services in the Province of Quebec.

##### **4.2 Anonymized Information used on an aggregated basis**

In accordance with applicable laws, Personal Information and/or other information may be anonymized and added to a consolidated dataset, that we may process on an aggregated basis: **(i)** for research purposes; **(ii)** for Website improvement; and **(iii)** for training, promotion and statistical purposes and as applicable any other lawful purposes. In any event, note that anonymized information cannot and will not be used to re-identify or re-contact any person.

#### **5. SECURITY**

**5.1 Measures implemented.** We use measures as may be reasonably required to preserve the security and privacy of Personal Information, such as the following measures:

- Securing data: Hyper Text Transfer Protocol (HTTPS) and Transport Layer Security (TLS) technologies are used, which can be confirmed by looking **(i)** at the address bar which will, depending on the browser, have a lock to the left of the website address (URL); and **(ii)** at the URL or the address bar of the browser, where the first characters of the address in that line should change from “http” to “https”.
- Limited access: Access to any Personal Information is granted only to our personnel on a “need-to-know” basis.
- Secured datacenters: The Website is hosted on the servers of the Montreal Heart Institute.

**5.2 LIMITATION.** DESPITE THE FOREGOING, ANY ELECTRONIC PLATFORMS AND SERVERS – AS WITH ANY OTHER FORM OF FILE – IS NOT INFALLIBLE AND FULLY SHELTERED FROM UNFORESEEABLE OR FORCE MAJEURE EVENTS, CYBERATTACKS OR UNAUTHORIZED USES AND ACCESS. ANYONE SHALL BE AWARE THAT THERE IS A RISK IN TRANSMITTING ANY DATA ELECTRONICALLY, WHICH IS INHERENT IN ALL ELECTRONIC DEALINGS, AS WELL AS TO ALL OTHER FORMS OF COMMUNICATIONS. CONSEQUENTLY, WE CANNOT GUARANTEE THAT INFORMATION WILL NEVER BE INTERCEPTED OR VIEWED OR SUBJECT TO OTHER INCIDENTS. SUCH EVENTS MAY OCCUR, PURSUANT TO WHICH DEVICES OR SYSTEMS CAN BE ACCESSED OR CONTROLLED BY UNAUTHORIZED PERSONS, AND UNDESIRABLE COMMUNICATIONS AND INVITATIONS MAY BE RECEIVED. SHOULD YOU OR ANY PERSON RECEIVE A COMMUNICATION THAT LOOKS LIKE IT IS FROM US ASKING FOR PERSONAL INFORMATION, YOU (OR SUCH PERSON) SHALL AVOID RESPONDING TO SUCH COMMUNICATIONS. WE WILL NEVER REQUEST FINANCIAL AND OTHER SENSITIVE INFORMATION THAT WAY. IF ANYONE HAS CONCERNS ABOUT THE SAFETY AND SECURITY OF PERSONAL INFORMATION, OR HAVE COMMUNICATED PERSONAL INFORMATION IN RESPONSE TO A SUSPICIOUS E-MAIL, POP-UP OR PHONY WEBSITE CLAIMING TO BE AFFILIATED WITH US OR IF ANY OF THE FOREGOING EVENTS TAKES PLACE, PLEASE **CONTACT** US IMMEDIATELY. YOU HAVE TO KEEP IN MIND THAT THERE IS NO SUCH THING AS PERFECT SECURITY.

## **6. STORAGE OF PERSONAL INFORMATION**

Subject to applicable laws, we will retain and store Personal Information for use and disclosure consistent with this Privacy Policy, as long as necessary for the purposes detailed herein, following which it will be deleted. Despite the foregoing, we may retain Personal Information after the specific purpose for which it was collected has been fulfilled if reasonably necessary: **(i)** to comply with applicable laws or prevent any contravention; **(ii)** to resolve disputes; and **(iii)** to enforce this Privacy Policy. Once no longer required, the information will either be erased or stored on an anonymized basis in accordance with applicable laws.

## **7. RIGHT OF ACCESSING AND OTHER RIGHTS**

In accordance with applicable laws, you may make requests for access or rectification, or prevail yourself of any other right under applicable laws, with respect to the Personal Information collected and stored by (or via) the Website as set forth above by **contacting** us. We will not discriminate against you for making any request of access or otherwise exercising any of your rights under applicable laws. Please note that we may be required or permitted by law to not delete (or allow deletion) of Personal Information. We will respond to all legitimate requests within the period of time set forth under applicable laws.

## **8. THIRD-PARTY WEBSITES**

Link to third-party websites may be provided on the Website for convenience or information purposes. Should it be the case, then you shall be aware that these sites operate independently and are subject to distinct terms of use and privacy policies, and shall not be seen as affiliated to us. It is strongly recommended that you review the distinct terms of use and policies of such third-party websites, as we have no control over and are not responsible for the content or practices of any such websites.

## **9. CONTACTING US**

### **9.1 Questions, comments and requests**

All questions and comments regarding this Privacy Policy or requests made in furtherance of said policy should be directed to us by one of the following means:

5000 Belanger Street, Montreal (Quebec) H1T 1C8 CANADA  
Attn.: Sophie Tanguay / Cinzia Raponi  
E-mail: [sophie.tanguay@mhicc.org](mailto:sophie.tanguay@mhicc.org) / [cinzia.raponi@icm-mhi.org](mailto:cinzia.raponi@icm-mhi.org)

Requests and demands made will be dealt with as soon as possible.

### **9.2 Withdrawal of consent**

We may communicate with you for the purposes set forth herein. We will generally use the same means of communication you used to contact us or the preferred means specified by you. You can withdraw applicable consent at any time by reply to that communication with the word "STOP" or "Unsubscribe" or similar wording.

#### **10. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change or modify this Privacy Policy from time to time. Any material change will be notified prior to the change taking effect via a web banner or by any other means reasonably bringing them to your attention, while those requiring an express consent, if any, will be made in a format allowing you to provide such consent. Thereafter, the Privacy Policy as updated will be made available and easily accessible. Furthermore, an updated version of this Privacy Policy will be published each time a minor change is made. Finally, we reserve the right to update and amend this Privacy Policy without prior notice to reflect legal and regulatory changes or additional requirements. Anyone may determine whether this Privacy Policy has changed by looking at the effective date appearing at the top of said Privacy Policy. We recommend that this Privacy Policy be reviewed periodically in order to assess the current practices applicable, as the continued use of the Website shall constitute acknowledgement and acceptance of any amendment thereto. Should you disagree with the amendments made to this Privacy Policy or other applicable terms and conditions, then you shall immediately stop accessing or using the Website. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.