

# MyOutcomes Privacy Policy

**Effective Date:** 23 April 2025

At **MyOutcomes**, your privacy and trust are of utmost importance. This Privacy Policy explains how we collect, use, disclose, and safeguard your information through our HIPAA-compliant software platform, including our web and mobile applications. We are committed to complying with applicable privacy laws including the **Health Insurance Portability and Accountability Act (HIPAA)** in the United States, **Canada's Personal Information Protection and Electronic Documents Act (PIPEDA)**, and the **General Data Protection Regulation (GDPR)** in the European Union.

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## 1. Information We Collect

We may collect and process the following categories of personal data:

- **Personal Identifiers:** Name, email address, phone number, location, and login credentials
  - **Health Information:** Mental health assessments, session outcomes, clinician notes, and other treatment-related data
  - **Technical Information:** IP address, device type, browser, language settings, usage logs, and cookies (as applicable)
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## 2. Purpose of Collection and Use

We use your information for the following purposes:

- To deliver and enhance our mental wellbeing services
  - To maintain secure communication between clients and clinicians
  - To comply with legal, regulatory, and contractual obligations
  - To customize user experiences and improve platform performance
  - To protect the security and integrity of our systems
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## 3. Legal Basis for Processing (GDPR)

For users within the EU, we process personal data under the following lawful bases:

- **Consent** (Article 6(1)(a))

- **Performance of a contract** (Article 6(1)(b))
  - **Legal obligation** (Article 6(1)(c))
  - **Legitimate interest** (Article 6(1)(f)) — for analytics and platform security
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#### 4. Consent and Individual Rights (PIPEDA & GDPR)

You have the right to:

- Access, correct, or delete your personal data
- Withdraw consent at any time (subject to legal or contractual limitations)
- Request data portability (GDPR only)
- File a complaint with your data protection authority

To exercise these rights, please contact us using the information below.

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#### 5. HIPAA Compliance (U.S. Users)

Our platform is fully HIPAA-compliant, meaning:

- Protected Health Information (PHI) is encrypted and stored securely
  - We follow the "minimum necessary" standard for data access
  - Only authorized personnel and clinicians can access your PHI
  - We enter into Business Associate Agreements (BAAs) where appropriate
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#### 6. Data Sharing and Disclosure

We do **not sell or rent** your personal information. We may share data:

- With your healthcare provider or authorized clinician
  - With your explicit consent
  - With service providers under data processing agreements
  - As required by law or to protect rights, safety, or legal obligations
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#### 7. Data Retention

We retain your information only as long as necessary for service delivery, legal compliance, and legitimate business interests. You may request data deletion subject to clinical and legal requirements.

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## 8. International Data Transfers

Your data may be stored or processed in countries outside of your jurisdiction. In such cases, we implement appropriate safeguards such as **Standard Contractual Clauses (SCCs)** or **Data Processing Agreements (DPAs)** to ensure an adequate level of protection.

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## 9. Data Security

We implement strong security protocols, including:

- End-to-end encryption of data at rest and in transit
  - Multi-factor authentication for access control
  - Regular security audits and compliance reviews
  - Secure data centers with restricted access
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## 10. Cookies and Tracking

Our platform may use cookies or similar technologies for session management and analytics. You can manage cookie preferences through your browser settings.

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## 11. SMS/MMS Text Messaging

**MyOutcomes places protecting users' privacy and security at the forefront of its operations.**

Opting in to receive text messages from MyOutcomes enables:

- **Delivery of One Time Password (OTP)** codes used to log into the MyOutcomes web and mobile apps
- **Direct access links** to MyOutcomes surveys sent by your provider

You will **only receive text messages** from MyOutcomes if you **explicitly opt-in** via the MyOutcomes web application. This includes enabling a checkbox to confirm your consent.

- **Message frequency may vary**
- **Message and data rates may apply**
- **Mobile opt-in data will not be shared with third parties for promotional and marketing purposes.**

- **You will never receive advertisements or solicitations**

You can opt out at any time through one of the following methods:

1. **SMS Opt-Out:** Text the word **'STOP'** to the number from which you received MyOutcomes messages.
2. **Link Opt-Out:** Click the **opt-out link** included in the confirmation email you received when opting in.
3. **Web Opt-Out:** Log into your MyOutcomes account and click the **"Opt-out of Receiving Text Messages"** button.

Text the word **'HELP'** to the number from which you received MyOutcomes messages to get assistance with SMS from MyOutcomes.

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## **12. Changes to This Privacy Policy**

We may revise this Privacy Policy from time to time. If changes are significant, we will notify you via email or in-app alerts.

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## **13. Contact Information**

If you have questions or would like to exercise your privacy rights, please contact:

**MyOutcomes Mental Wellbeing**

Email: [support@myoutcomes.com](mailto:support@myoutcomes.com)

Phone: 250-317-7331

Mailing Address: 2339 BC Highway 97 #430, Kelowna, BC, Canada V1X 4H9