

ASEQ PRIVACY POLICY

Last updated: May 2024

ASEQ (“**we**,” “**us**,” or “**our**”) administers the Health and Dental Plan and/or other well-being programs on behalf of student associations at many educational institutions across Canada (“**Student Plan/Program**”). As administrator of the Student Plan/Program, respecting the privacy and confidentiality of personal information is an important concern for ASEQ.

For more details on how we collect, use, and share personal information, we invite you to review our Privacy Policy below.

THE SCOPE OF THIS POLICY

This Privacy Policy describes how ASEQ collects, uses, discloses, and holds your personal information collected in connection with the administration of the Student Plan/Program, including via its website (www.aseq.ca) and any mobile application it manages.

If you click through to links to third-party websites or applications from our website, this Privacy Policy does not apply to such external services. It is always a good idea to read their privacy policies to understand what they do with your information.

WHAT PERSONAL INFORMATION DOES ASEQ COLLECT?

ASEQ obtains certain personal information about students from their educational institution or their student association, or directly from them. This information is limited to the minimum required for the proper administration of the Student Plan/Program. Please see the table below for more details.

Category	Examples	Purposes and Means of Collection
Identifying Information	First name, last name, date of birth, postal address, email address, phone number, student ID number, gender, educational institution	<p>We obtain this information from educational institutions or student associations, or directly from students when the educational institution does not hold it. We may also collect this information when you communicate with us via email or interactive forms or otherwise provide it to us.</p> <p>We collect this personal information to enable students to take full advantage of the services and benefits offered by the Student Plan/Program and to allow them to make informed choices regarding changes in coverage and use of benefits.</p>
Technical Information	IP address, date, time, and duration of your visits on our website, the pages viewed and links clicked on our website, your language preferences, browsing history, web pages that redirected you to our website	<p>We collect this data using cookies and pixels on our website, including those provided by trusted third parties who collect it on our behalf.</p> <p>ASEQ also measures traffic on its website and compiles the pages visited by users. The compilation is done offline by consulting the site log file or through third-party analysis tools such as Google Analytics. ASEQ analyzes usage statistics in terms of users' domain name, type of web</p>

		<p>browser, and type of MIME protocol used (information included in anyone's web browser).</p> <p>This information allows us to compile aggregate data about traffic and interactions on our website in order to improve our products, services, website content, and advertising.</p> <p>You can change your cookie settings either directly via your browser settings or by using the options provided in our pop-up consent banner. Please be advised, however, that rejecting certain cookies may prevent you from taking full advantage of our website.</p> <p>ASEQ uses cookies that are essential to the proper operation and security of the website, and more specifically to the coverage manager. These cookies cannot be deactivated.</p>
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Please note that we may also collect and use your information for any other purpose permitted or required by law.

COMMUNICATION OF PERSONAL INFORMATION

ASEQ shares your information with certain third parties where necessary to fulfil the purposes identified above, including as set forth in the table below:

Category	Explanations
Authorized Individuals	<p>In some cases, ASEQ may be authorized to share personal information with certain third parties to confirm a student's coverage and eligibility for the Student Plan/Program, such as with employees of educational institutions' health service centres.</p> <p>The Student Plan/Program members may also authorize ASEQ to contact a representative to act on their behalf in the administration of the Student Plan/Program. To do so, the member must fill out ASEQ's Representative Authorization Form.</p>
Service Providers	We may share your information with our authorized third-party service providers for purposes related to website hosting, data storage, customer relationship management, and performing background checks.
Professional Advisors	We may share your information with our legal, financial, accounting, or other consultants to the extent necessary to operate our business and comply with applicable laws.
Law Enforcement and Other Authorities	We may receive requests from authorities to access your information. We will validate that the request is licit before responding. When possible, we will advise you. We will only share what is strictly required.

Category	Explanations
Commercial Transactions	We may share your information with an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

PAYMENT OF BENEFITS

ASEQ may also communicate certain personal information to the insurance company or other third-party payers, to ensure the proper management of claims made by Student Plan/Program members. This information includes:

- First and last name
- Student ID number
- Date of birth
- Gender
- Postal address

Where a claim concerns the dependant of a Student Plan/Program member, we may also provide information regarding the nature of the relationship between the member and the dependant (e.g. child, adult child, spouse, partner).

When processing a claim, the insurer or third-party payer may ask the Student Plan/Program member to provide additional information to verify the validity of the claim.

CONFIRMATION OF COVERAGE WITH HEALTH SPECIALISTS

A health-care specialist may agree to have insurable amounts paid directly to them by the insurer if the student or one of their dependants so requests following receipt of a covered service. To do so, the health specialist may ask ASEQ to validate the Student Plan/Program member's coverage and eligibility. ASEQ will confirm the member's coverage, if they agree, by providing the specialist with the student's name and unique student ID number.

WITHDRAWING FROM THE STUDENT PLAN/PROGRAM

Students requesting to be withdrawn from the Student Plan/Program may be required to submit proof of coverage under another health or dental plan to complete their withdrawal, as agreed to in the agreement signed to authorize participation in the Student Plan/Program. For proof of coverage to be considered acceptable, the information provided must indicate whether the student has health or dental coverage, the name of the insurance company, and the contract number. If the student is covered as a dependant under a parent's or a legal guardian's policy, then the proof of coverage may indicate the name of the parent or guardian (and not necessarily that of the student).

The following documents are accepted as proof of coverage:

- An image of the summary of benefits from the insurer's website;
- A copy of a certificate or membership card;
- A letter from the plan sponsor (often the employer) or insurance company;
- For Indigenous (First Nations, Métis, Inuit) students receiving services from Health Canada, a copy of their status card or band membership.

ASEQ reserves the right to confirm whether the coverage under another health or dental plan is valid and equivalent to the Student Plan/Program directly with the provider shown on the proof of coverage.

HOW DOES ASEQ PROCESS YOUR INFORMATION?

STORING YOUR INFORMATION

Your information may be held at our offices and those of authorized third parties as described above. Some of these third parties may be based or share your information outside of your region. By submitting information to us, you consent to the communication of your information to, and the storage of that information, outside of your region. While such information is outside of your region, it is subject to the laws of the jurisdiction in which it is held, and may be subject to disclosure to the governments, courts, or law enforcement or regulatory agencies of such other jurisdictions pursuant to local laws. However, our practices regarding your information will continue to be governed by this Privacy Policy.

PROTECTING YOUR INFORMATION

We implement reasonable physical, administrative, and technical safeguards designed to preserve the confidentiality, integrity, and security of information under our control. However, information transmitted on the Internet and/or stored on systems attached to the Internet is not 100% secure, and no security can provide absolute protection. As a result, we do not ensure, warrant, or guarantee the security or integrity of such information.

We retain your information only for as long as is necessary for us to fulfil the relevant purposes specified in this Policy and to comply with our legal obligations.

We take steps to ensure that only those who need access to your information to perform their duties have access to it.

YOUR RIGHTS REGARDING YOUR INFORMATION

Under certain circumstances and subject to applicable laws, supported by a written request and proof of identification, you may consult the personal information that we have collected, used, or shared, and/or ask that it be corrected, and/or withdraw your consent to our disclosure or use of personal information collected.

As required or permitted by law, you may be entitled to additional rights, including (i) the right to control the dissemination of your personal information; (ii) the right to receive computerized personal information collected from you in a structured, commonly used, and technological format and to have this information transferred directly to another organization; (iii) the right to be informed of and submit observations regarding automated decision-making; and (iv) the right to request information about data processing.

If you believe that applicable privacy laws have not been respected, you may file a complaint with us using the contact information provided below. You also have the right to file a complaint directly with the appropriate data protection authority.

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

UPDATING THIS POLICY

From time to time, we may update this Privacy Policy. Subject to applicable laws, we will notify you of these changes. Updates will be effective when we post the revised Privacy Policy. This Privacy Policy was last updated as of the effective date listed at the top of this page.

CONTACT US

If you have any questions, requests, or complaints regarding your information or this Privacy Policy, please contact our Privacy Officer at:

ASEQ

1200 McGill College Avenue, Suite 2200
Montreal, Quebec H3B 4G7
Attention: Privacy Officer

A request can also be sent by email to the following address: vieprivee@aseq.com