



OLYMPUS CANADA INC.

PRIVACY POLICY

There are certain provincial and federal laws that apply, directly or indirectly, to Olympus Canada Inc. and to companies affiliated or related to it (hereinafter collectively "**Olympus**"). On the provincial level, the *Personal Health Information Protection Act* and associated regulations ("**PHIPA**") set provincial standards that apply in respect of the collection, use and disclosure in Ontario of personal health information. On the federal level, the *Personal Information Protection and Electronic Documents Act* and associated regulations ("**PIPEDA**") set national standards that apply to every organization in respect of personal information collected, used or disclosed in the course of commercial activities. Other federal and provincial laws and regulations that pertain to privacy or security and/or other potentially sensitive information may also directly or indirectly impact Olympus.

For the purposes of this Policy, the term "personal health information" (referred to in this Policy as "**PHI**") shall have the same meaning as in PHIPA and the term "personal information" (referred to in this Policy as "**PI**") shall have the same meaning as in PIPEDA. Furthermore, for the purposes of this Policy, "PI" does not include PHI collected, used or disclosed in Ontario.

It is Olympus's policy to comply with all applicable laws and regulations relating to privacy and security and to assist our customers, who are directly regulated under such laws and regulations, to achieve compliance. Consistent with this, Olympus strives to protect PI and PHI of any type in a manner consistent with its sensitivity. Olympus's privacy and security policy is implemented as follows:

Olympus, as a provider of medical device repair, service and "troubleshooting" to various of our customers who are Health Information Custodians, as defined in PHIPA ("**HIC**"), may come into possession of PHI as a result of the above-referenced services. Olympus may come into the possession of PHI as a result of acting as agent of HICs for the collection, use, disclosure, retention or disposition of PHI on behalf of HICs, or as a result of providing goods or services for the purpose of enabling HICs to use electronic means to collect, use, modify, disclose, retain or dispose of PHI, or otherwise in the course of providing such services. As a result, Olympus has various responsibilities pursuant to PHIPA pertaining to the use and disclosure of such PHI.

Furthermore, Olympus has entered and continues to enter into agreements and/or has provided and continues to provide assurances to various of such customers (collectively, the "**Customer Agreements**") under which Olympus has agreed to use and disclose PHI and/or PI that comes into its possession as a result of the above-referenced services, in accordance with such Customer Agreements.

Furthermore, Olympus' consumer products division may come into possession of PI in the course of repair and service of devices, which may impose various legal obligations pertaining to such PI.

Furthermore, Olympus may come into possession of PI in other situations, such as in connection with granting of credit and payment processing and in connection with registration for various programs, seminars and workshops presented by Olympus and/or affiliated companies. The possession of PI in any one or more of these situations may impose various legal obligations pertaining to such PI.

As a general rule, Olympus does not sell, rent or trade PHI or PI that it collects. Olympus will not knowingly use PHI or PI or disclose PHI or PI to any third parties except as may be permitted by law.

Olympus's privacy related obligations are fulfilled via written Standard Operating Procedures (SOPs) and other documentation. The topics covered by these SOPs and other documentation include, but are not limited to: responsibilities of Olympus's Privacy Officer; procedures to protect PHI and PI; the means of fulfilling and documenting requests for access to and amendment of PHI and PI; handling of any allegations concerning improper use or disclosure of PHI and PI; and training of Olympus employees. Where practical, Olympus obtains assurances regarding the use and disclosure of PHI and PI from its agents and subcontractors.

Individuals have the right to access, verify and correct or amend their PI collected by Olympus. A request with respect to such right should be sent via email to the Privacy Officer at Olympus at privacy.canada@olympus.com or by phoning Olympus at ((289) 269-0100 (Ext. 0 for Reception) and requesting to speak with the Privacy Officer.

Olympus also acknowledges that individuals have the right to file a complaint with Olympus concerning the collection, use and/or disclosure of PI. A complaint may be filed via email to the Privacy Officer at Olympus at privacy.Canada@olympus.com or by phoning Olympus at (289) 269-0100 (Ext. 0 for Reception) and requesting to speak with the Privacy Officer.

All complaints will be investigated by the Olympus Privacy Officer as soon as is practical in the circumstances. Individuals will be notified of the outcome of the investigation of complaints clearly and promptly and will be notified of any relevant steps taken or to be taken as a result of a complaint.

Any comments or questions about this Privacy Policy, should be addressed to Olympus as follows:

By mail:

Olympus Canada Inc.
25 Leek Crescent
Richmond Hill, Ontario
L4B 4B3

Attention: Privacy Officer

By email:

privacy.canada@olympus.com

By phone:

(289) 269-0100 (Ext. 0 for Reception)

This Statement has been adopted by Olympus as of October 1, 2008. Revisions to the Statement will be posted on www.olympuscanada.com as soon as practical.



SCHEDULE "A"
**PRINCIPLES GOVERNING THE COLLECTION, USE AND DISCLOSURE OF PERSONAL
INFORMATION BY OLYMPUS CANADA INC.**

Principle 1 - Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

Principle 2 - Identifying Purposes

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

Principle 3 - Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

Principle 4 - Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

Principle 5 - Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Principle 6 - Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Principle 7 - Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

Principle 8 - Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

Principle 9 - Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

Revised: September 2015