



PULSE 360 Program Privacy Policy

PULSE 360 PROGRAM

Address (USA): 2000 South Dixie Hwy., Suite 103, Miami, FL 33133

Tel. (USA): 305-285-8900

Address (CANADA): 157 Adelaide Street West, Suite 112, Toronto, ON M5H 4E7

Tel. (CANADA): 416-800-9203

PULSEInfo@PDPFlorida.com

This privacy policy sets forth how the PULSE 360 Program (PULSE 360) use and protect any information that clients provide to PULSE 360 when using our online survey instruments or tools.

The basic PULSE 360 Program is a web-based automated 360° survey system which opens by email with no connections to the Facility's internal system (i.e., facility participants and raters only go to the links that are sent to them by PULSE via email where they participate, for example, by selecting raters and/or completing surveys).

PULSE 360 is committed to ensuring that our clients' privacy is protected. When clients provide information by which their physicians, practitioners, partners and/or employees can be identified when using our web-based surveys or tools, this information is used in accordance with this privacy statement.

This policy was last updated on January 26th, 2021.

What we collect from our client organizations

Depending on the program specifications the client organization requests, we may collect some of the following information about individuals participating as potential Raters (feedback providers) and Feedback Recipients (feedback receivers), for example:

- The name, job title/specialty, educational degree/licensure, etc.
- Relevant contact information including email or other address, work phone and extension, etc.
- Demographic information such as hire date, job title, department or unit to which they are assigned, etc.

What we do with the information we gather

This information is required to create a highly automated survey feedback product as well as to ensure a high rate of survey responses. In addition, we require the information for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services through analysis of group level data, for example, to create survey norms for the client organization.
- We may use the information to customize the survey experience according to your organization's interests.
- Unless required by law, we will never share your information with any third-party entities.

- Rater lists, emails and/or related rater information are never sold, exchanged or provided to any other entities for any other purpose.

Security Policies

We are committed to ensuring that client organization information is secure. In order to prevent unauthorized access or disclosure, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information that we collect online.

- IT Security: Survey system and client data is housed in a stand-alone network provided at the PULSE 360 worksite. This set-up constitutes a web-server that provides clients access to surveys and tools; a database server that is not accessible outside the PULSE 360 firewall and houses all collected client information and data; and a mail server which is not accessible outside the PULSE 360 firewall that communicates with the database server to create survey email requests to feedback recipients and raters. Our system is automated to an extent that it easily identifies and notifies the IT Department of any malicious activity that can be anticipated. This system performs periodic back-ups that are saved with de-identified data by PULSE 360 IT managers.
- Survey Security: PULSE 360 follows a surveying process that provides confidentiality and anonymity of participants. Note that survey response requests are tracked by a participant's email address through an automated process by our mail and database servers to improve survey response rates by using email reminders. All participant survey response requests are assigned a random ID and password for access to our secure survey site if the automated access link contained in the email to the participant cannot be used in the client organization's IT structure. A separate ID and password are provided for each and every survey request, not based on a specific rater or feedback recipient.
- Data Security: Data pertinent to each feedback recipient is handled by approximately five individuals within PULSE 360: PULSE 360 Survey Coordinator; PULSE 360 Program Manager; Director of Facility-wide Programs; PULSE 360 Program Director; and, if necessary, by the IT Manager or Coordinators. All collected data is aggregated for analysis and preparation of the PULSE feedback reports. Additionally, open-ended item responses may be formatted to a standardized text format to increase each survey participant's anonymity. PULSE 360 only provides the summarized feedback report to individuals who the client organization has identified as appropriate to receive such feedback (e.g., a facility liaison, the assigned professional coach, a physician-leader, and/or an administrator or supervisor of a feedback recipient who will review feedback with that person).

Internet cookies

PULSE 360 does not use internet cookies for any of our online survey products.

Links to other websites

PULSE 360's online tools do not contain links to any websites outside of the PULSE 360 domain (pulseprogram.ca, survey.florida.com and/or sys.florida.com).

Controlling client information

The client organization may choose to restrict the collection or use of their participants' information in the following ways:

- If a client organization has previously agreed with PULSE 360 in using information for direct marketing purposes, they may modify that agreement at any time by writing or emailing us at pulseinfo@pdpflorida.com.

PULSE 360 will not sell, distribute or lease client organization information to third parties unless we have the client organization's written permission or as required by law.

Each individual participant may request details of personal information which we hold about the individual under the Data Protection Act 1998. A small fee will be payable by the client organization. If a participant would like a copy of the information held on them, he or she may write to PULSE 360 using our contact information listed below.

If it is determined that the information pertaining to a specific individual is incorrect, then that individual or an approved representative of the client organization may request a change/update of this information by email to: pulsesurvey@pdpflorida.com.

Client Consent

By using our online survey system or tools, a client organization consents to our privacy policy. However, each individual participant of a client organization who is selected to provide feedback has the right to opt out of the survey process and be removed from future surveying (if applicable to your facility's program). The individual simply needs to contact PULSE 360 at pulsesurvey@pdpflorida.com and request removal upon receipt of a survey request.

The client organization determines whether or not a feedback recipient must participate in the survey process and must request PULSE 360 to remove an individual feedback recipient from the survey process.

Privacy Contact Information

If you have any questions, concerns, or comments about our privacy policy you may contact us by using the information below:

By e-mail: pulseinfo@pdpflorida.com

By Phone: (305) 285-8900 or (416) 800-9203

By Letter:

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