



Privacy Policy

for Auditra.

Effective: **January 1, 2026** | Last updated: **March 1, 2026** | Jurisdiction: **Ontario, Canada** | Governed by: **PIPEDA & PHIPA**

We are a compliance company. That means we hold ourselves to the same standard we help our clients meet. This policy explains exactly what data we collect, why, and how it is protected.

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Who We Are

Auditra ("Infortex", "we", "us", "our") is an Ontario corporation operating the Auditra platform — a PHIPA compliance management tool for Ontario clinics and organizations handling patient data.

Our registered address and privacy contact details are listed in Section 15. Infortex is the data controller for all personal information collected through this website and the Auditra platform.

Infortex is not a law firm and does not provide legal advice. This Privacy Policy does not create a solicitor-client relationship. For formal PHIPA or PIPEDA legal advice, please consult a qualified privacy lawyer.

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Scope of This Policy

This Privacy Policy applies to:

- Visitors to **auditra.ca** and all related subdomains
- Users of the **Auditra platform** (web application)
- Individuals who complete the **PHIPA Gap Assessment** tool
- Anyone who submits a contact, demo request, or enquiry form
- Subscribers to Auditra email communications

This policy does **not** apply to the personal health information (PHI) of patients that clinic clients manage within the Auditra platform. That data is governed by our Data Processing Agreement with each clinic subscriber and by PHIPA. See Section 7 for details.

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Data We Collect

We collect only the information necessary to provide and improve Auditra. We do not collect data speculatively.

Category	Examples	Source	Required?
Account Information	Name, email address, clinic name, role	You, on signup	Required
Assessment Data	Gap assessment answers, scores, risk bands	You, via assessment tool	Optional
Contact & Enquiry	Name, email, clinic, message content	You, via contact form	Optional
Billing Information	Name, billing address, last 4 digits of card	Stripe (payment processor)	Required for paid plans
Usage & Analytics	Pages visited, features used, session duration	Automatically, via platform	Functional
Technical Data	IP address, browser type, device type	Automatically, on visit	Functional

We do **not** collect sensitive personal information such as financial account numbers, Social Insurance Numbers, biometric data, or health information about our subscribers (as distinct from the PHI their clinics manage — see Section 7).

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How We Use Your Information

We use the information collected for the following purposes:

- **To provide and operate the Auditra platform** — account management, compliance tracking, document storage, and reporting features
- **To process and respond to enquiries** — contact form submissions, demo requests, and support requests
- **To deliver assessment results** — sending your PHIPA Gap Assessment report to the email address you provide
- **To process payments** — billing management via our payment processor (Stripe)

- **To send service communications** — account notices, compliance reminders, and subscription updates
- **To improve the platform** — aggregated, anonymized usage analytics to understand how features are used
- **To comply with legal obligations** — including responding to lawful requests from regulatory authorities

We do **not** sell your personal information to third parties. We do not use your data for automated profiling or decision-making that produces legal effects.

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Legal Basis for Processing

Infortex operates under **PIPEDA** (Personal Information Protection and Electronic Documents Act) as the primary federal privacy framework governing commercial activity in Canada. Where applicable, we also adhere to Ontario's **PHIPA** in our role as a service provider to health information custodians.

Our legal bases for processing personal information are:

- **Consent** — for marketing communications, assessment result emails, and cookies
- **Contractual necessity** — to fulfil our obligations under your Auditra subscription agreement
- **Legitimate interests** — for platform security, fraud prevention, and service improvement
- **Legal obligation** — where required by applicable Canadian law

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Data Storage & Residency

All Auditra platform data is stored exclusively on **Microsoft Azure Canada Central** servers located in Toronto, Ontario. **Data never leaves Canada.** We have deliberately architected Auditra on Canadian infrastructure to ensure our clinic clients can meet their own PHIPA data residency obligations.

Specific technical safeguards include:

- AES-256 encryption at rest via Azure SQL Transparent Data Encryption
- TLS 1.2+ encryption in transit for all data transfers
- Row-level database security preventing cross-tenant data access
- Tamper-evident audit logs using Azure SQL Ledger
- Policy documents stored in private Azure Blob containers with time-limited signed URLs
- Zero credentials stored in application code — all secrets managed via Azure Key Vault

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Patient Health Information (PHI)

Auditra is a compliance management tool. **Clinic subscribers do not upload, store, or transmit patient health records through Auditra.** The platform manages compliance documentation (policies, staff records, audit logs, breach reports) — not patient charts or medical records.

To the extent that any incidental PHI (such as a staff member's name appearing in a breach incident report) is processed through the platform, Infortex acts as an **agent** of the health information custodian (the subscribing clinic) as defined under PHIPA s.17.

Clinic operators: By subscribing to Auditra, you confirm that your use of the platform complies with your obligations as a health information custodian under PHIPA. A Data Processing Agreement is available upon request and is included with Enterprise plan subscriptions.

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Sharing & Disclosure

We do not sell, rent, or trade your personal information. We share data only in the following limited circumstances:

- **Service providers** — Microsoft Azure (hosting and storage), Stripe (payment processing). All vendors have executed data processing agreements
- **Legal requirements** — where required by a court order, warrant, or lawful demand from a Canadian regulatory authority. We will notify you unless prohibited by law
- **Business transfers** — in the event of a merger, acquisition, or sale of assets, subject to the same privacy obligations
- **With your consent** — for any other purpose, only with your explicit prior consent

We do not share data with advertising networks, data brokers, or analytics companies that build individual profiles.

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Data Retention

Data Type	Retention Period	Reason
Active subscriber account data	Duration of subscription + 90 days	Service provision, wind-down period
Compliance records (policies, logs)	7 years from creation	PHIPA record-keeping obligations
Billing records	7 years from transaction	CRA tax and audit requirements

Data Type	Retention Period	Reason
Gap assessment results	24 months	Service improvement, re-engagement
Contact form submissions	24 months	Customer service record
Server access logs	90 days	Security monitoring
Anonymized analytics	Indefinite	Product improvement (no personal data)

Upon account cancellation, you may request complete deletion of your data within the 90-day wind-down period.

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Your Privacy Rights

Under PIPEDA and applicable provincial privacy legislation, you have the following rights regarding your personal information:

- **Right of access** — request a copy of the personal information we hold about you
- **Right to correction** — request correction of inaccurate or incomplete information
- **Right to withdraw consent** — withdraw consent for non-essential processing at any time
- **Right to deletion** — request deletion of your personal information, subject to legal retention requirements
- **Right to data portability** — receive your compliance data in a portable format (PDF or CSV) within 48 hours
- **Right to complain** — lodge a complaint with the Office of the Privacy Commissioner of Canada (priv.gc.ca)

To exercise any of these rights, contact our Privacy Officer (Section 15). We will respond within **30 days** as required by PIPEDA.

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Cookies & Tracking

This website uses a minimal number of cookies necessary for basic functionality. We do not use advertising cookies, cross-site tracking cookies, or third-party analytics that build individual profiles.

Cookie	Purpose	Duration	Type
session_id	Maintains your authenticated session in the platform	Session	Essential

Cookie	Purpose	Duration	Type
csrf_token	Security token preventing cross-site request forgery	Session	Essential
preferences	Stores UI preferences (dark mode, language)	1 year	Functional

You may disable cookies in your browser settings. Disabling essential cookies will prevent you from logging into the Auditra platform.

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Security Measures

We implement technical, organizational, and administrative safeguards appropriate to the sensitivity of the information we process. Key measures include:

- All staff complete annual privacy and security training
- Access to production systems is restricted on a least-privilege basis
- Multi-factor authentication required for all internal system access
- Regular third-party security assessments
- Documented Breach Response Policy with IPC notification procedures
- All vendor agreements include security and confidentiality requirements

Reporting a security concern: If you discover a potential vulnerability in the Auditra platform, please contact us immediately at the address in Section 15. We commit to acknowledging all security reports within 24 hours.

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Children's Privacy

Auditra is a professional compliance platform intended for use by healthcare organizations and their staff. We do not knowingly collect personal information from individuals under the age of 18. If you believe a minor has submitted information through our platform, please contact us immediately and we will delete it promptly.

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Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or platform features. When we make material changes, we will:

- Update the "Last updated" date at the top of this page
- Send an email notification to all active subscribers at least 30 days before the change takes effect

- Display a notice within the Auditra platform dashboard

Continued use of the platform after the effective date of any change constitutes acceptance of the revised policy. Previous versions of this policy are available upon request.

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Contact Our Privacy Officer

For any privacy-related questions, access requests, complaints, or to exercise your rights under PIPEDA, please contact our designated Privacy Officer:

Company	Auditra by Infortex (Infortex Inc.)
Email	privacy@auditra.ca
Address	6-2557 Dougall Avenue, Suite 518, Windsor, Ontario, Canada N8X 1T5
Response Time	Within 30 days as required by PIPEDA

If you are not satisfied with our response, you may file a complaint with the **Office of the Privacy Commissioner of Canada**:

- 30 Victoria Street, Gatineau, Quebec K1A 1H3
- Toll-free: 1-800-282-1376
- Website: priv.gc.ca

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