

PRIVACY POLICY

As health care providers we must collect a certain amount of personal information from you in order to safely treat you. Personal information is regulated federally and may be defined as any information of a personal nature (ie. about an identifiable individual) including personal characteristics, health, activities and views. It is extremely important that this information be collected responsibly and that it only be disclosed to other individuals under appropriate circumstances. This document details your rights and how your personal information is protected.

Viewing your own personal information

With only a few exceptions, you have the right to see what personal information we hold about you. We will try to help you understand any information that may be unclear (e.g., short forms, technical language, etc.). If you would like a copy of your personal information, please make your request in writing. Herondale Wellness reserves the right to charge a nominal fee for such requests.

Some exceptions may apply. For example, when the information relates to law enforcement, legal proceedings or another individual, you may not get to see the record.

We must respond to your request as soon as possible and within 30 days.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake we will make the correction. At your request and where it is reasonably possible, we will notify anyone to whom we sent this information (but we may deny your request if it would not reasonably have an effect on the ongoing provision of health care). If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point.

Who can see your health information?

When you request health care from Herondale Wellness, we assume that we have your permission to collect, use and share that information with your other health care providers. This is limited only to those providers who you have actually seen for health care; other providers are not entitled to your information, except in the cases we have listed below.

If you do not want us to use, share or give out some or all of your personal health information to other people who provide you with health care, please inform us as soon as possible.

Others agencies or companies may need to see part of your health care information, such as your employer or your insurance company. However, we cannot share information with these companies without your express permission.

When Your Consent is Not Required

We are allowed or may be required to use and/or give out some of your personal health information without consent in the following situations:

- to report certain information, such as to report certain diseases to public health authorities
- when I suspect certain types of abuse
- to reduce a significant risk of serious bodily harm to a person or the public
- to assist health researchers for research, as long as strict privacy requirements are met
- to improve or maintain the quality of care or any related program or service
- for risk management and legal purposes
- to transfer or sell the professional practice to another person and to allow that person to assess the practice, so long as he or she signs an agreement to keep the information confidential and secure
- to assess a person's ability to make health care and other important decisions
- for administration or enforcement of laws about the practices of health care providers, such as when my regulatory College (the CMTO) does a peer assessment with me
- for the purpose of a legal proceeding or complying with a court order, or other legal requirement

Security

We understand the importance of protecting your personal information. For that reason, we have taken the following steps:

- Paper information is either under supervision or secured in a locked cabinet.
- Paper files containing personal information are destroyed by shredding
- Computers and backups are under supervision or secure in a locked or restricted area at all times. In addition, passwords are used on computers, and screens are locked when they are not in use.

- Electronic information is destroyed by deleting and, when the hardware is discarded, the hard drive is physically destroyed. In the unlikely event of a privacy breach, you will be informed immediately.
- We do not post any personal information about our clients on social media sites and all clinicians and administrators are trained on the appropriate use of social media sites.

Retention of Personal Information

We are required to retain personal information for some time to ensure that we can answer any question you may have about the services provided and for our own accountability to the College of Massage Therapists (CMTA).

We keep client files for at least ten years from the date of the last client interaction or from the date the client turns 18

Marketing and Personal Information Use

Your personal information may be used by Herondale Wellness for the following purposes:

- Within our appointment setting/reminder application: Setmore
- Within our Financial accounting application: Wave
- Provided to Telus Health, Greenshield, Blue Cross for the purposes of direct billing
- To communicate with you for various reasons

Your personal information will never be provided to anyone for marketing purposes.

If there is a Privacy Breach

While we will take precautions to avoid any breach of your privacy, if there is a loss, theft or unauthorized access of your personal health information we will notify you. Upon learning of a possible or known breach, we will take the following steps:

- We will contain the breach to the best of our ability, including by taking the following steps:
 - Retrieving hard copies of personal health information that have been disclosed
 - Ensuring no copies have been made
 - Taking steps to prevent unauthorized access to electronic information (e.g., change passwords, restrict access, temporary shutdown system)
 - We will notify affected individuals
 - We will provide our contact information in case the individual has further questions
 - We will provide the Commissioner's contact information

- We will investigate and remediate the problem, by:
 - Conducting an internal investigation
 - Determining what steps should be taken to prevent future breaches (e.g. changes to policies, additional safeguards)

Depending on the circumstances of the breach, we may notify and work with the Information and Privacy Commissioner of Ontario. In addition, we may report the breach to the relevant regulatory College, The College of Massage Therapists of Ontario, if we believe that it was the result of professional misconduct, incompetence or incapacity. If you have a concern about the professionalism or competence of our services or the mental or physical capacity of any of our professional staff we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory body:

COLLEGE OF MASSAGE THERAPISTS OF ONTARIO
1867 Yonge Street, Suite 810, Toronto, ON M4S 1Y5br
(416) 489-2626, (800) 465-1933, facsimile (416) 489-2625,
cmto@cmto.com, www.cmto.com

Questions?

If you would like further information, you can contact the clinic.. I would be happy to discuss any questions or concerns you may have. As well, if you have a formal complaint to make concerning my privacy practices, you should contact me in writing at the address below:

Claire Jackson, RMT
Herondale Wellness
13238 Ilderton Road
Ilderton, N0M 2A0
519-854-3593

I will respond to your concerns promptly. If, after discussing the issue with me, I am still not able to resolve your complaint or concern, you also have the right to complain to the Information and Privacy Commissioner of Ontario if you have concerns about our privacy practices or how your personal health information has been handled. This must be done within one year of the matter you are complaining about, by contacting:

Privacy and Information Commissioner
112 Kent Street, Ottawa, ON K1A 1H3
613-995-8210
1-800-282-1376
613-947-6850 fax
613-992-9190 TTY
www.privcom.gc.ca

