

# **Advanced Orthodynamics Inc. Privacy Policy**

The federal **Personal Information Protection and Electronic Documents Act** came into full effect on January 1, 2004. We have always been committed to safeguarding your personal information. Please be assured that we are in compliance with the Act. The information below outlines our privacy policy and how it affects you.

## **What Is Personal Information?**

Personal information includes personal and health characteristics (e.g., gender, age, home address, ethnicity, health history, health conditions, health services received). It is not the same as business information (e.g., an individual's business address and telephone number) which is not protected by privacy legislation.

## **Why do we Collect Personal Information?**

### *About You*

The primary purpose for collecting personal information is to provide you with orthotic treatment. For example, we collect information about your health history, including your family history, physical condition and function and social situation in order to help us assess what your health needs are, to advise you of your options and then to provide the appropriate orthotic care. A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that are occurring over time.

It would be rare for us to collect personal information without your express consent, but this might occur in an emergency (e.g., if you were unconscious) or where we believe you would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from you and we have no reason to believe that the message is not genuine).

### *About Members of the General Public*

For members of the general public, our primary purpose for collecting personal information is to provide notice of special events or to make them aware of orthotic services in general or our clinic in particular. We try to obtain consent before using any such personal information and will, upon request, immediately remove any personal information from our distribution list.

On our website we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave (e.g., to respond to your email message, to register for a course, to subscribe to our newsletter). Cookies are only used to help you navigate our website and are not used to monitor you.

## *Secondary Purposes*

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- ❑ To invoice clients for goods or services not paid for at the time, to process credit card payments or to collect unpaid accounts.
- ❑ To bill third party fundors (e.g. WSIB, private insurance, Assistive Devices Program). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- ❑ To advise clients that their device or service should be reviewed (e.g., to ensure a brace is functioning properly and appropriate for their current needs, to consider modifications or replacement), and to answer any questions they may have.
- ❑ To advise clients and others of special events or opportunities (e.g., a seminar, development of a new service, arrival of a new product) that we have available.
- ❑ To review client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff.
- ❑ To allow representatives from the Canadian Board of Certification of Prosthetists & Orthotists to inspect our records as a part of their regulatory activities. In addition, as professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. Also, our association believes that it should report information suggesting serious illegal behaviour to the authorities. Sometimes these reports include personal information about our clients to support the concern.
- ❑ To allow various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) to review our files and interview our staff as a part of their mandates.
- ❑ To give external consultants (e.g., auditors, lawyers, accreditation programs) the ability to perform audits and continuing quality improvement reviews.
- ❑ To allow a purchaser of Advanced Orthodynamics Inc to conduct a “due diligence” review of our records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

## **Protecting Personal Information**

It is important that your personal information be protected. To ensure your privacy, we have taken the following steps:

- ❑ Paper information is either under supervision or secured in a locked or restricted area.
- ❑ Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- ❑ Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- ❑ Electronic information is transmitted either through a direct line or is encrypted.
- ❑ Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- ❑ External consultants and agencies with access to personal information must enter into privacy agreements with us.

## **Retention And Destruction Of Personal Information**

We keep your files for about ten years after our last contact with you. However, if you ask, we will remove your personal information right away. Please note that if you withdraw your consent, it is likely we will be unable to provide you with orthotic services. We keep any personal information relating to our general correspondence (i.e., with people who are not clients) newsletters, seminars and marketing activities for about six months after the newsletter ceases publication or a seminar or marketing activity is over.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

## **You Can Look At Your Information**

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also explain to you any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity before providing you with this access. We reserve the right to charge a nominal fee for such requests.

We may need to ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days and tell you the reason why.

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 and notify anyone to whom we sent this information. If we do not agree, we will include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

### **Do You Have A Question?**

Our Privacy Officer, Carolyn Trickey-Bapty, will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Privacy Officer. She will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

This policy is made under the *Personal Information Protection and Electronic Documents Act*. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. **The Information and Privacy Commissioner of Canada** can be reached at:

112 Kent Street | Ottawa, Ontario | K1A 1H3

**The agency only accepts enquiries by mail.**

[www.privcom.gc.ca](http://www.privcom.gc.ca)

