



PRIVACY POLICY & PROCEDURES

PURPOSE

Protecting the privacy and confidentiality of personal information is an important aspect of the way **Eramosa Physiotherapy Associates hereinafter known as EPA** conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to **EPA** daily operations.

SCOPE

This policy applies to **EPA**, employers, managers and employees.

POLICY STATEMENT

As a physiotherapy clinic, we collect, use and disclose personal information in order to serve our clients. Our primary purpose for the collections of information is to provide the best possible physiotherapy treatment. For example, we may collect your past health history, your family's health history and your current physical condition to help us assess your personal health needs. Consent may also be needed so diagnostic tests may be obtained to provide more information on your health.

Eramosa Physiotherapy is the sole owner of your information. It is not shared or sold to other organizations.

DEFINITIONS

Personal information	Is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views
Consent	Occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorizing EPA to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.
Implied consent	Is granted by the individual when he/she signs the application or form. This allows EPA to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.

RESPONSIBILITIES

All workplace parties are expected to comply with the outlined policy and the procedures herein.

Employer:

- Ensure employees are trained regarding **EPA's** privacy practices;
- Immediately advise clients of any breach of the Privacy Policy;
- Annually review, date and sign the policy.

Manager(s):

- Ensure employees are following the Privacy Policy guidelines and procedures;
- Train employees and provide assistance if required;
- Report any breaches of the privacy policy to management.

Employee(s):

- Attend training regarding **EPA's** privacy policy;
- Understand and follow the Privacy Policy procedures and guidelines at all times;
- Report any breach of the Privacy Policy to their manager.

PROCEDURES

EPA collects and uses personal information solely for the purpose of conducting business and developing an understanding of its customers.

EPA hereby asserts that personal information will only be used for the following purposes:

- To invoice clients for services provided;
- To collect unpaid accounts;
- For follow-up of care;
- To remind clients of appointments, which is typically done electronically and/or through telephone/texts
- The cost for some clients may be paid for by a third party (i.e. WSIB, Automobile insurance). These third parties have your consent or the authority to direct us to disclose certain personal information to ensure client entitlement for payment;
- We retain our client information for 10 years as required by the Regulated Health Professional Act; Some clients may return for further treatment at a later date, and their past records may be of benefit.
- For Clinic events, announcements or updates where we sent via email/text we have received your explicit consent and where clients always have the

ability to opt out at any time. We specifically avoid regular mass emails. You could expect to receive 2-4 mass emails annually at best.

Access to personal information will be authorized only for the employees and other agents of **EPA** who require the information to perform their job duties, and to those otherwise authorized by law.

EPA's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases.

- Active files are kept in locked filing cabinets;
- Personal information is not transferred to volunteers, summer students, interns, or other non-paid staff by e-mail or any other electronic format;
- All unnecessary paperwork is shredded so it cannot be seen or duplicated.

EPA's Web site will include our privacy policy and disclose our personal information practices. Individuals inputting data into the Web site will be notified of:

- Personally identifiable information about the individual that is collected from the Web site or through affiliate sites;
- Information about the organization collecting the data;
- How the data will be used;
- With whom the data may or may not be disclosed;
- What options are available to the individual regarding the collection, use, and disclosure of personal information;
- The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under **EPA's** possession and control;
- How the individual may access and correct any inaccuracies in their personal information;
- **EPA** may share compiled demographic information with its business partners and/or advertisers, but no personal information that can identify any individual person shall be disclosed;
- This Web site may contain links to other sites, but **EPA** is not responsible for the privacy practices of other organizations' site;
- Site visitors are given the choice to opt out of having their personal information used at the point where the information is gathered.

In most instances, **EPA** will grant individuals access to their personal information upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with his/her personal information, please notify **EPA** as soon as possible to make the appropriate corrections. Should **EPA** deny an individual's request for access to his/her personal information, **EPA** will advise in writing of the reason for such a refusal. The individual may then challenge the decision.

EPA may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:

- **EPA** is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a regional or federal, under the purview of the appropriate authorities;
- An emergency exists that threatens an individual's life, health, or personal security;
- The personal information is for in-house statistical study or research;
- The personal information is already publicly available;
- Disclosure is required to investigate a breach of contract.

Any questions or concerns regarding this Privacy Policy can be addressed by contacting us at 519-767-9950 or guelph@eramosaphysio.com. **EPA** will investigate and respond to concerns about any aspect of the handling of personal information. This organization will address concerns to the best of its abilities.

REFERENCES

- **EPA's** Progressive Discipline Policy and Procedures
 - All relevant forms (Category One and Category Two)

Reviewed by/Approved:	Signature:
Date:	Document to be posted: No

REVIEW HISTORY

Date	Signature	Next Review Date
		One year from today
		One year from today
		One year from today