

Privacy Policy

Kura Naturopathic Clinic & RMT

Privacy of personal information is an important principle to us at Kura Naturopathic Clinic & RMT. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We try to be open and transparent about how we handle personal information. This document describes our privacy policies.

What is Personal Health Information?

Personal health information is information about an identifiable individual. Personal health information includes information that relates to:

- The physical or mental health of the individual (including family health history);
- The provision of health care to the individual (including identifying the individual's health care provider);
- Payments or coverage for health care;
- The testing of an individual's body part or bodily substance;
- The identification of the individual's substitute decision-maker.

This information can include:

- Name, address, telephone number, fax number, e-mail address, date of birth, occupation, place of employment, insurance company, insurance coverage
- Education, gender, sexual orientation, ethnicity, health history, health records, family history, hours of work, income
- Activities or views (e.g. religion, politics, opinions, community involvement)

Who We Are

Our organization, Kura Naturopathic Clinic & RMT, includes at the time of writing a total of six professionals and support staff. We have a few consultants and agencies that may, in the course of their duties, have limited access to personal health information we hold. These include computer consultants, bookkeepers and accountants, lawyers, temporary workers to cover holidays, credit card companies, website managers, cleaners, volunteers and naturopathic preceptors. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

Why We Collect Personal Information

Primary Purposes: We collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose of collecting personal health information is to provide naturopathic care (NDs) or massage therapy (RMTs). For example, we collect information about a client's health history, including their family history, physical condition and function and social situation in order to help us assess what their health needs are, to advise them of their options and then to provide the health care they choose to have. A second primary purpose is to obtain a baseline of health and social information to that in providing ongoing health services we can identify changes that are occurring over time.

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

Related Purpose #1: To invoice and obtain payments for services or goods provided.

Related Purpose #2: To enable us to contact you and maintain communication with you in regard to things such as appointment bookings and confirmations.

Related Purpose #3: To allow us to communicate with other treating health-care providers, including specialists, family practitioners, referring physicians, and any other provider involved in the care.

Related Purpose #4: To promote our clinic, new services, special events and opportunities that we have available. We will obtain express consent from you (in the intake form) prior to collecting or handling personal health information for this purpose.

Related Purpose #5: To comply with external regulators. Our professionals are regulated by CONO (NDs) and CMTO (RMTs) who may inspect our records and interview our staff as a part of their regulatory activities in the public interest. Each College has its own strict confidentiality and privacy obligations. In addition, as professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. In addition, we may be required by law to disclose personal health information to various government agencies.

Related Purpose #6: To educate our staff and preceptors. We value the education and development of future and current professionals. We may review client records in order to educate our staff and students about the provision of health care.

Related Purpose #7: To facilitate the sale of our organization or individuals' practices. If the organization, its assets or a practice were to be sold, the potential purchaser would want to conduct a "due diligence" review of the organizations records to ensure that it is a viable business that has been honestly portrayed. The potential purchaser must first enter into an agreement with the organization to keep the information confidential and secure and not to retain any of the information longer than necessary to conduct the due diligence. Once a sale has been finalized, the organization may transfer records to the purchase, but it will make reasonable efforts to provide notice to the individual before doing so.

Protecting Personal Information

We understand the importance of protecting personal information. For that reason, 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.
- Our physical location is protected by an alarm system.
- We try to avoid taking personal health information home to work on there. However, when we do so, we transport, use and store the personal health information securely.
- Our staff members are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance to our privacy policy.
- We do not post any personal information about our clients on social media sites.
- External consultants and agencies with access to personal information must enter into privacy agreements with us.
- Special note in regard to e-mail communication: we try to strike a balance between efficient and convenient exchange of information while taking reasonable precautions. Please be aware that e-mail communication carries inherent risks and can be intercepted in transmission, misdirected or be otherwise accessed inappropriately. As a result, consider communicating any sensitive information by telephone, fax, mail, or in person.

Retention and Destruction of Personal Information

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, in order to protect your privacy, we do not want to keep personal information for too long. We keep our client files for at least ten years from the date of the last client interaction or from the date the client turns 18.

We destroy paper files containing personal health information by shredding. We destroy electronic information by deleting in a manner that it cannot be restored. When hardware is discarded, we ensure that the hardware is physically destroyed, or the data is erased or overwritten in a manner that the information cannot be recovered.

Accuracy and Access of Personal Information

Kura Naturopathic Clinic & RMT endeavors to ensure that your personal information is as accurate, complete, and as up-to-date as necessary for the purposes that it is to be used. Information shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information is used to make a decision about you as our patient.

With only a few exceptions, you have the right to see what personal information we hold about you, by contacting Dr. Alexandra Verge, ND. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g. short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge \$30.00 for the first twenty pages of records and 25 cents for each additional page. We may ask you to put your request in writing. We will respond to your request as soon as

possible and generally within 30 days, if at all possible. If we cannot give you access, we will tell you the reason, as best we can, as to 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 a 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.

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, temporarily shut down 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
 - Ensuring staff is appropriately trained and conduct further training if required

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 if we believe that it was the result of professional misconduct, incompetence or incapacity.

Consent

Generally, we need **implied** or **express** consent before collecting, using or disclosing personal health information. Implied consent can be assumed from surrounding circumstances that a client would reasonably agree to the collection, use or disclosure of their personal health information. An example of this would be a client booking an appointment, attending an appointment and answering questions required to open a record. Relying on implied consent is only proper w

- Clients have the information they need to understand why their information is being collected and it may be used or disclosed (as outlined by this Privacy Policy)
- That Privacy Policy Notices are posted in high traffic areas or waiting rooms describing why information is collected, used and disclosed and informing clients that they may withhold or withdraw their consent (and how to do so), and

- Clients have not withheld or withdrawn their consent

Express consent is required in a few situations such as when disclosing personal health information to someone other than a health information custodian such as an employer or insurance company (except where otherwise directed by statute) and when using personal health information for a purpose other than providing health care.

It is our policy at Kura Naturopathic Clinic & RMT to preferentially seek express consent for the collection, use and/or disclosure of personal information, except where it might be inappropriate to obtain your consent, and subject to some exceptions set out in law. Once consent is obtained, we do not need to seek consent again, unless the use, purpose or disclosure changes. Consent may be withdrawn at any time. A client's withdrawal has no effect on information collected, used or disclosed before the patient withdrew consent.

Do You Have Questions or Concerns?

Our Information Officer Dr. Alexandra Verge, ND can be reached at 519-766-9759. She will attempt to address any questions or concerns you may have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information 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.

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, by contacting:

Information and Privacy Commissioner/Ontario
2 Bloor St. East, Suite 1400
Toronto, Ontario M4W 1A8
Telephone: (416) 326-3333/(800) 387-0073 Fax: (416) 325-9195
www.ipc.on.ca

This policy is made under the Personal Health Information Protection Act, 2004, S.O. 2004, c.3. It is a complex statute and provides some additional exceptions to the privacy principles that are too detailed to set out here.