

Paul Lewis Services: Privacy Policy

We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. This document describes our privacy policies in accordance to the Regulated Health Professions Act and the Massage Therapy Act (1991), and the Professional Health Information Protection Act (PHIPA).

WHAT IS PERSONAL INFORMATION?

Personal information is information about identifiable individuals. Personal information includes information that relates to:

- 1 an individual's personal characteristics (e.g., gender, age, income, home address or telephone number, ethnic background, family status);
- 2 health (e.g., health history, health conditions, health services received by them);
- 3 activities and views (e.g., opinions expressed by an individual, an opinion or evaluation of an individual).

Personal information is different from business information (e.g., an individual's business address and telephone number). This is not protected by privacy legislation.

WHO WE ARE

Paul Lewis Services offers various fitness and massage therapy services of treatment and education to students,

other therapists and the general public. We are staffed by Registered Massage Therapists.

WE COLLECT PERSONAL INFORMATION: PRIMARY PURPOSES

Like all medical professions, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide treatment. For example, we collect information about a client's health history, including their family history, physical condition, 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 so that in providing on going health services we can identify changes that occur over time.

WE COLLECT PERSONAL INFORMATION: RELATED AND 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 that was not paid for at the time, to process credit card payments or to collect unpaid accounts.

Our clinic reviews clients and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external

consultants (e.g., auditors, practice consultants) may on our behalf do audits and continuing quality improvement reviews of our Clinic, including reviewing client files and interviewing our staff.

Registered Massage Therapists are regulated by the College of Massage Therapists of Ontario (CMTO). The CMTO may inspect our records and interview our staff as a part of their regulatory activities in the public interest. 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 organization believes that it should report information suggesting serious illegal behavior to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals, to support the concern (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g., Lawyers, Accountants) who will investigate the matter and report back to us.

The cost of goods/services provided by the organization to clients is often paid for by third parties (e.g., motor vehicle accident insurance, private insurance). These third party payers often have the client's consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.

Clients or other individuals we deal with may have questions about our goods or services after they have been received. We retain our client information for a mandatory minimum of ten years after the last contact to enable us to respond to those questions and provide these services.

BOOKING ONLINE: WHAT INFORMATION DO WE COLLECT?

- 1 We do not collect any Personally Identifiable Information when browsing our site. We may, however, collect information such as time of day, browser type and IP address. This information is used to make improvements on our site.
- 2 When you book an appointment online we collect personal information necessary to provide you with the service you have requested.

PROTECTING PERSONAL INFORMATION

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

- 1 Paper information is either under supervision or secured in a locked or restricted area.
- 2 Electronic hardware is either under supervision or secure 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.
- 3 Electronic information is transmitted either through a direct line or has identifiers removed or is encrypted.

- 4 Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- 5 External consultants and agencies with access to personal information must enter into privacy agreements with us.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We need to retain personal information for some time to ensure that we can answer any question the client may have about the services provided and for our own accountability to external regulatory bodies.

We keep our clients files for ten years according to our College regulations.

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. 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 a nominal fee for such requests.

If there is a problem we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

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 that we have made a mistake, we will still agree to 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?

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 written decision with reasons.

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 Therapy of Ontario

1867 Yonge Street, Suite 810

Toronto, ON M4S 1Y5

416 489-2626

1-800-465-1933

416 489-2625 fax

www.cmtto.com

For more general inquiries, the information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The information and Privacy Commissioner can be reached at:

112 Kent Street

Ottawa Ont K1A 1H3

Phone (613)995-8210/800 282-1376

Fax (613)947-6850

TTY (613)992-9190

www.pricom.gc.ca