

# **Privacy Policy**

The privacy of your personal information is important to me. I'm committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services I provide. This document describes mine privacy policies.

#### WHAT IS PERSONAL INFORMATION?

Personal information includes information that relates to:

- an individual's personal characteristics (e.g., gender, age, income, home address or telephone number, ethnic background, family status);
- health (e.g., health history, health conditions, health services received by them);
- 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.

## I COLLECT PERSONAL INFORMATION: Primary Purposes

Like all medical professionals, I collect, use and disclose personal information in order to serve mine clients. The primary purpose for collecting personal information is to provide treatment. For example, I collect information about a client's health history, including their family history, physical condition, function and social situation in order to help me assess what their health needs are, to advise them of their options and then to provide the health care they choose to have.

## I COLLECT PERSONAL INFORMATION: Related and Secondary Purposes

Like most organizations, I also collect, use and disclose information for purposes secondary to my primary purposes. The most common examples of my 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.

I review clients and other files for the purpose of ensuring that I provide high quality services. In addition, external consultants (e.g., auditors, practice consultants) may on my behalf do audits and continuing quality improvement reviews of my Clinic, including reviewing client files.

Sleegers Massage Therapy Theodora Sleegers, RMT (705) 970-3090



Registered Massage Therapists are regulated by the College of Massage Therapists of Ontario (CMTO). The CMTO may inspect my records and interview me as a part of their regulatory activities in the public interest. Also, my 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 my 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 my files and interview me as a part of their mandates. In these circumstances, I may consult with professionals (e.g., Lawyers, Accountants) who will investigate the matter and report back to me.

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 me to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.

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

#### PROTECTING PERSONAL INFORMATION

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

- Paper information is either under supervision or secured in restricted area.
- Electronic hardware is either under supervision or secure in a restricted area at all times. Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or has identifiers removed or is encrypted.
- External consultants and agencies with access to personal information must enter into privacy agreements with me.

### RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

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

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

I destroy paper files containing personal information by shredding. I destroy electronic information by deleting it and, when the hardware is discarded, I 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 I hold about you. I can help you identify what records I might have about you. I will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). I will need to confirm your identity, if I do not know you, before providing you with this access. I reserve the right to charge a nominal fee for such requests.

If there is a problem I may ask you to put your request in writing. If I cannot give you access, I will tell you within 30 days if at all possible and tell you the reason, as best I can, as to why I 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 I may have formed. I may ask you to provide documentation that my files are wrong. Where I agree that I made a mistake, I will make the correction and notify anyone to whom I have sent this information. If I do not agree that I have made a mistake, I will still agree to include in my file a brief statement from you on the point and I will forward that statement to anyone else who received the earlier information.

#### DO YOU HAVE A QUESTION?

If you have a concern about the professionalism or competence of my services I would ask you to discuss those concerns with me. However, if I 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 1-800-465-1933 www.cmto.com

If you have any questions about this policy or anything else regarding my services, please do not hesitate to ask me. E-mail: <u>SleegersMassageTherapy@gmail.com</u>