

KING LIBERTY HEALTH CENTRE

Written Statement of Privacy Policy

King Liberty Health Centre provides Registered Massage Therapy, Chiropractic Care, Acupuncture, Naturopathic Medicine, Reflexology and Osteopathic treatments. Our staff comprises of Registered Massage Therapists, a Naturopathic Doctor, Chiropractic Doctor, Osteopathic Manual Practitioner and Certified Reflexologist. 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.

What is Personal Information?

Personal Information is defined as any information that identifies you or provides a method by which your identity could be deduced.

Types of Personal Information King Liberty Health Centre collects:

- an individual's personal characteristics (e.g., gender, age, home address, telephone number, emergency contact information etc);
- health (e.g., health history, health conditions and health services received for them);
- or 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.

Purpose of Collecting Personal Information

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

- To invoice clients for goods and services that were 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 etc) may on our behalf do audits, including reviewing client files and interviewing our staff.

Third-Party Regulatory Bodies

- Registered Massage Therapists are regulated by the college in Ontario. The College of Massage Therapists 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. Our organization believes that it should report information suggesting serious illegal behaviour 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 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.

- Chiropractic Doctors are regulated by the college in Ontario. The College of Chiropractors of Ontario may inspect our records and interview our staff as part of their regulatory activities in the public interest. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals to support the concern. Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission have the authority to review our files and interview our staff as a part of their mandates.

- Naturopathic Doctors are regulated by the college in Ontario. The College of Naturopaths of Ontario may inspect our records and interview our staff as part of their regulatory activities in the public interest. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals to support the concern. Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission have the authority to review our files and interview our staff as a part of their mandates.

- Osteopathic Manual Practitioners are regulated by the college in Ontario. The College of Osteopathic Manual Practitioners may inspect our records and interview our staff as part of their regulatory activities in the public interest. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals to support the concern. Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission have the authority to review our files and interview our staff as a part of their mandates.

- The cost of goods/services provided by third parties (e.g., motor vehicle accident insurance, private insurance, Assistive Devices Program). 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 or reimbursement.

- Clients or other individuals we deal with may have questions about our goods and services after they have been received. We retain our client information for a minimum of ten (10) years after the last

contract to enable us to respond to those questions and provide these services (our regulatory College requires us to retain our client records).

- In the case of when online purchasing becomes available on our website (www.kinglibertyhealthcentre.com), such as a gift certificate or pain relieving gel, you are required to submit personal information such as your name and phone number. The information below refers to primarily to online purchases.

For your privacy and security, credit card numbers are not stored in the system, computer or written down anywhere within the clinic.

Your Information and other non-regulatory Third Parties

We do not rent, sell or exchange your name or other personally-identifiable information to third-party companies for any purposes. Under no circumstances will your personal information be disclosed to any third-party unless we seek your express consent or are required to do so by law.

Email List

When you book an appointment with us, we ask you at the time of booking for your email address as we send out confirmation, reminder and clinic information emails with our appointment bookings. Once you voluntarily give us your email address, we will only use it to communicate appointment bookings, cancellations, changes and periodic short and informative newsletters containing holiday hours, info on any events, promotions or changes to the clinic.

Each email will contain simple instructions on how to unsubscribe (opt-out) from the list.

We are committed to following and upholding the Canadian Federal Privacy Legislation. Never will we exchange, lend or sell our email mailing list to anyone. Information submitted to us is only available to employees managing this information for purposes of sending you emails and to contracted service providers for purposes of providing services relating to our communications with you.

Privacy Policy Changes

King Liberty Healthy Centre may deem it necessary or appropriate from time to time to modify this privacy policy to reflect changes in the way King Liberty Health Centre collects or uses information or changes in privacy-related laws, regulations, or industry standards. Accordingly, King Liberty Health Centre reserves the right to change this privacy statement at any time by posting the revised policy. Information will be handled according to the privacy statement in effect at the time the information is used.

King Liberty Health Centre does not sell, share, barter, rent, divulge or otherwise disseminate personal information.

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 secure in a locked or restricted area.
- Electronic hardware is either under supervision or secure in a locked or restricted area at all times. In addition, passwords are used on computers, emails or other soft-copy files containing sensitive information.
- Electronic information is transmitted with through a direct line or has identifiers removed 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 or 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 questions the clients may have about services provided and for our own accountability to external regulatory bodies.

We keep our clients files for ten (10) years according to the College of Massage Therapists

We keep our clients files for seven (7) years according to the College of Chiropractors of Ontario.

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.

Access to Your Information

With only a few exceptions, you have the right to see what personal information and records we hold 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 access.

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 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.

Contacting the Privacy Officer

This policy addresses some of the main privacy concerns that you might have. If you have concerns regarding King Liberty Health Centre's Privacy Policy or questions about our compliance with the PIPEDA guidelines contact:

Kedra Patterson, Clinic Manager/Director
131 Jefferson Ave
Toronto, ON M6K 3E4
647-350-2932

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street
Ottawa, ON K1A 1H3
1-800-282-1376

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 your concerns with us. However, if we cannot satisfy your concerns, you are entitled to issue a formal complaint to our regulatory body:

College of Massage Therapists of Ontario
1-800-465-1933

Osteopathic College of Ontario
647-956-8962

College of Chiropractors Of Ontario
416-922-6355

College of Naturopaths of Ontario
416-583-6010

Ontario College of Traditional Chinese Medicine Toronto
416-901-8818

Changes to this Privacy Policy

Because of the ever-changing nature of the online medium and the world around us, King Liberty Health Centre may change this policy from time to time. Changes will occur without warning and they will be reflected on this page.