

IN FOCUS REHABILITATION INC.

PRIVACY POLICY

*Privacy of personal information is an important principle to **InFocus Rehabilitation Centre Inc.** 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.*

We Collect Personal Information: Primary Purposes

Like all healthcare professionals, 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 physiotherapy treatment. 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 appropriate treatment. 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 are occurring over time. It would be rare for us to collect such information without the client's express consent, but this might occur in an emergency (e.g., the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from our client and we have no reason to believe that the message is not genuine).

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 were not paid for at the time, to process credit card payments or to collect unpaid accounts.
- To advise clients and others of special events or opportunities (e.g., a seminar, development of a new service, arrival of a new product) that we have available.
- Our clinic reviews client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff.
- Physiotherapists are regulated by the College of Physiotherapists of Ontario who may inspect our records and interview our staff as a part of their regulatory activities in the public interest.
- The cost of some goods/services provided by the organization to clients is paid for by third parties (e.g., OHIP, WSIB, private insurance, Assistive Devices Program). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- We retain our client information for a minimum of ten years after the last contact to enable us to respond to questions and provide future services (our regulatory College also requires us to retain our client records).

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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 at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- Staff is trained to collect, use and disclose personal information only as necessary to for fill their duties and in accordance with our privacy policy.

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, we do not want to keep personal information too long in order to protect your privacy. We keep our client files for about ten years. 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. Often all you have to do is ask. 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 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.