

## Privacy Policy

Privacy of personal information is an important principle to us at 3D Health Solutions. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the appropriate provision of the products and services we provide to our patients. We also try to be open and transparent as to how we handle personal information. The following describes our privacy policies.

### What is personal Information?

Personal information is information about an identifiable individual, including that which relates to his/her personal characteristics, (eg. gender, age, home address, phone numbers, and/or email address, family status), his/her health (eg. health history, health conditions, health services received by them). Personal information is not to be confused with business information (eg. an individual's business address and telephone number), which is not protected by PIPEDA, the Personal Information Protection and Electronic Documents Act, an act of the Federal government.

### Who we are

Our organization, 3D Health Solutions, includes multiple locations. We use a number of agents that may, in the course of their duties, have limited access to personal information we hold. These include coaches at our CrossFit locations, computer consultants, accountants, cleaners, maintenance, credit card companies, and lawyers. 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 principals.

### We collect personal information: Primary Purposes Patients

Like all healthcare clinics, we collect, use and disclose personal information in order to serve our patients. The primary purpose for collecting personal information is to ensure our patients are provided with the best care possible. For example, we collect information about the patient'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. This may include administrative and clinical office procedures designed to optimize scheduling and the coordination of care between chiropractors, massage therapists, physiotherapists, and chiropractic assistants. We may use and disclose health information to obtain payment for services we provide. This may include patient health information with an invoice used to collect payment for care received in our clinic but not without prior consent (eg. Personal, automobile insurance forms, and/or Blue Cross claim submissions). It is also possible that health information will be disclosed during audits by government appointed agencies as part of their quality assurance and compliance reviews. Your health information may be reviewed during the routine processes of certification, licensing or credentialing activities. We may also call the patient's name in the reception area to direct them to their provider.

### About Members of the General Public

For members of the general public, our primary purpose for collecting personal information are to provide notice of special events or to make the public aware of our services in general or our clinic in particular. On our website we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave it to us. For example, to respond to the public's email message, to register for a class or to subscribe to our monthly newsletter. 3D Health Solutions does not use any personal information from patients or general public cookies during visits to our website.

## 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 not paid for at the time of service, to process credit card payments or to collect unpaid accounts.
- To remind patients of a scheduled appointment or that it may be time for the patient to contact us to schedule an appointment.
- To advise patients of special events, health classes, or product information.
- Communication with patients may include cards, letters, newsletters, telephone reminders or electronic reminders such as email or text. There may be occasion a voice message may be left on an answering machine or it may be left with the person answering the phone.
- Our clinic reviews patient 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 may on our behalf do audits and continuing quality improvements reviews of our clinic, including reviewing client files and interviewing our staff.
- Chiropractors are regulated by the College of Chiropractors of Ontario and the massage therapists are regulated by the College of Massage Therapists of Ontario, who may inspect our records and interview staff as 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 their own.
- Also, like all organizations, various government agencies have the authority to review our files and interview our staff as part of their mandates. In these circumstances, we may consult with professionals who will investigate the matter and report back to us.
- The cost of some goods/services provided by our clinic to patients is paid by third parties (eg. WSIB, HCAI, Blue Cross, and/or personal insurances). 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.
- Patients or other individuals we deal with may have questions about our goods or services after they have been received. We also provide ongoing services for many of our patients over a period of months or years for which our previous records are helpful. We retain our patient information for a mandatory minimum of ten years after the last contact to enable us to respond to those questions and provide these services.
- If 3D Health Solutions or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the Clinic’s records to ensure it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and services files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be part of some of these related or secondary purposes (eg. by declining special offers or promotions, ensuring payment at the time of service). We do not, however, have much choice about some of these related or secondary purposes (eg. external regulations).

## 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 areas at all times. In addition, passwords are used and protected on computers.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted through a direct line.
- 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 and agents 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 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 patient files for about ten years. Our patient and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away. We keep any personal information relating to our general correspondence, newsletters, marketing activities for approximately two years or after the newsletter ceases publication. We destroy all paper files and documents 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 have 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 (eg. 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 minimal 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 thirty 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 have any questions or concerns, please contact our Office Manager:

Stephanie Dunnill  
10-371 Bronte Street South,  
Milton, ON L9T 3K5  
905-693-9001

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

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 Chiropractors of Ontario  
130 Bloor Street West, Suite 902  
Toronto, ON M5S 1N5  
416-922-6355 tel 1-877-577-4772 toll free 416-925-9610 fax [www.cco.on.ca](http://www.cco.on.ca)

College of Massage Therapy of Ontario  
1867 Yonge Street, Suite 810  
Toronto, ON M4S 1Y5  
416-489-2626 tel 1-800-465-1933 toll free 416 489-2625 fax [www.cmto.com](http://www.cmto.com)

This policy is made under the Personal Information Protection and Electronic Documents Act. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above. 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 contacted at:

Privacy and Information Commissioner  
112 Kent Street, Ottawa, ON K1A 1H3  
613-995-8210 tel 1-800-282-1376 toll free 613-947-6850 fax 613 992-9190 TTY [www.privcom.gc.ca](http://www.privcom.gc.ca)