

# PRIVACY POLICY

## Introduction

In 2000 the federal government enacted *The Personal Information Protection and Electronic Documents Act* (hereinafter referred to as PIPEDA). This legislation came into effect as of January 1<sup>st</sup>, 2004, whereby all organizations that collect, use or disclose personal information in the course of their daily business will be subject to PIPEDA.

PIPEDA requires that consent be obtained for the collection and use of each individual 's personal information, and that this information be protected.

The Veterinary Emergency Clinic/Referral Centre (hereinafter referred to as the VEC) collects personal information from its clients for the purpose of maintaining effective client/clinic communication and to enable all aspects of the provision of veterinary medical services to its patients. The VEC also collects personal information from its employees for the purpose of human resources management and daily administration. Personal data may also be collected from VEC suppliers for the purpose of materials management.

The VEC is committed to controlling the collection, use and disclosure of personal information provided by its customers, employees and suppliers, and has adopted this privacy policy in order to ensure the confidentiality and integrity of this data. The privacy policy and practices of the VEC have been established in accordance with the requirements of PIPEDA and may be amended in the future if the province of Ontario enacts privacy legislation, in order to ensure compliance with such legislation.

## Policy

The VEC privacy policy has been developed in accordance with the standards set out in PIPEDA and is modeled after the *Canadian Standards Association Model Code for the Protection of Personal Information*, CAN/CSA-Q830-96 (the "CSA Code"). As outlined by this model the ten principles of fair information practices have been adopted by the VEC and represent a formal statement of the minimum requirements to be adhered to for the protection of the personal information collected from the clients, suppliers and employees of the VEC.

### Accountability

The VEC has assigned a "Privacy Officer" within the organization. This person will be accountable for compliance with the personal information policy and procedures set out in the privacy policy.

The VEC is committed to protecting the personal information of its clients, suppliers and staff, and have accordingly set an appropriate level of protection/security, implementing procedures to protect personal information such as the adoption of physical, organization and technological security measures.

The VEC will ensure that its clients, suppliers and employees have the opportunity to review and update their personal information on file with the clinic. All questions and concerns with regard to this will be directed to the Privacy Officer.

### Identifying Purpose

The VEC will collect, use and disclose personal information in order to serve our clients. The primary purpose for such collection, use or disclosure of personal information is to provide quality veterinary services to our clients.

It would be rare for the VEC to collect such information without the express consent of the client, but this might occur in an emergency or where we believe the client would consent if asked and where it is impractical to obtain consent (ie. family member passing a message that we have to reason to believe is not genuine).

Common purposes for the collections, use or disclosure of personal information include:

- To maintain complete and accurate records, and to comply with the requirements of the College of Veterinarians of Ontario and the Veterinarians Act.
- To provide goods and services to our clients, to communicate effectively with our clients and to communicate and work with third parties providing veterinary medical or other services to our clients.
- To invoice clients, employees and third parties for goods or services and to collect unpaid accounts.
- The cost of some goods/services provided by the VEC to clients may be paid for by a third party (i.e. insurance companies). These third-parties often have client consent to disclose to them certain information in order to demonstrate client entitlement to this funding.
- To comply with lawful requests from governmental agencies such as Canada Customs and Revenue Agency and the Ontario Human Rights Commission.
- The purposes for which the personal information of employees is collected may include, but is not limited to:
  - administering payroll and employee benefit programs;
  - conducting performance evaluations and discipline;
  - effecting employee training;
  - conducting internal reviews/investigations
  - complying with legal and regulatory obligations
  - to maintain complete and accurate personnel files
- If the VEC or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the clinics records in order to confirm factual and other information about the business.

#### Consent

Consent is required for the collection of personal information and the subsequent use or disclosure of this information. The VEC will seek consent for the use or disclosure of the information at the time of collection. In certain circumstances, consent with respect to the use or disclosure of personal information may be sought after the information has been collected but before the personal information is used. There may be situations where implied consent is given by an individual. Implied consent will not be in writing, but the circumstances relating to the provision of implied consent shall be such that a reasonable person would conclude that the individual has consented, or would consent, if asked. Individuals providing information through e-mail or the website shall be considered to have consented to the collection. Consent may be given orally when information is collected over the telephone.

Consent can be withdrawn at anytime, subject to legal or contractual restrictions.

#### Limiting Collection

The VEC will not collect personal information indiscriminately, personal information shall be collected by fair and lawful means. Both the amount and the type of information collected shall be limited to that which is necessary to fulfill the purposes identified in this policy.

#### Limiting Use, Disclosure and Retention

Personal information will not be used or disclosed for the purposes other than those for which it was collected, except with the consent of the individual providing the information or except where disclosure is required by law. Personal information shall be kept only as long as it remains necessary or relevant for the identified purposes or as required by law.

#### Accuracy

The VEC will make every effort to ensure that the information collected is sufficiently accurate, complete and up-to-date for the purpose for which the information is to be used.

Personal information about customers, suppliers and employees shall be updated only as and when necessary to fulfill the identified purposes or upon notification by the individual.

#### Safeguards

The VEC will implement security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held.

The VEC will ensure that its employees keep all personal information confidential and comply with the security standards established by the VEC.

The VEC shall require third parties to whom information is disclosed to commit to an appropriate level of security (which may include execution of a confidentiality covenant) in protection of such information to satisfy the standards established by the VEC.

Physical measures such as locked filing cabinets and restricted access to offices, organizational measures such as security clearances and limiting access on a "need-to-know" basis, and technological measures such as the use of passwords and encryption have been adopted in accordance with the standards established by the VEC.

The disposal and destruction of personal information shall be carried out with the necessary precautions to prevent third parties from accessing such information to maintain the confidentiality of such information.

#### Transparency/Openness

The VEC will be open about its policies and practices with respect to the management of personal information. Customers, suppliers and employees shall be able to acquire information about the VEC's policies and practices with respect to the management of personal information without unreasonable effort.

The VEC will make available information concerning the identity of its Privacy Officer, and the means by which a person can communicate with the Privacy Officer, the VEC will also ensure that individuals are aware of the means of gaining access to their personal information.

#### Individual Access

Upon request, the VEC shall inform an individual client, supplier or employee whether it holds personal information about that individual (except where permitted or required by law not to disclose personal information) and shall afford the individual a reasonable opportunity to review the personal information in his or her file. The individual will be able to address the accuracy and completeness of his/her personal information and have it amended, if inaccurate or incomplete.

The VEC will respond promptly to any request by an individual for access to his or her personal information.

The VEC will maintain a complete record of third parties to whom personal information has been disclosed, and will make such record available to an individual whose personal information has been disclosed.

#### Questions and Concerns Regarding Compliance with this Policy

Anyone providing information to the VEC may address any question, concern or complaint regarding the VEC's compliance with the privacy policy with the Privacy Officer.