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## Burketon Massage Therapy

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### **PRIVACY POLICY**

Privacy of personal information is an important principle at *Burketon Massage Therapy*. I am committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services I provide. I also try to be open and transparent as to how I handle personal information. This document describes the privacy policies. Please read this document carefully because I want you to know that *Burketon Massage Therapy* protects your personal information.

#### **WHAT IS PERSONAL INFORMATION?**

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, home address or phone number), their health (e.g., health history, health conditions, and health services received by them) or their activities and views (e.g., opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is to be contrasted with business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

#### **WHO WE ARE?**

*Burketon Massage Therapy* consists of one Registered Massage Therapist, Darlene Spence, who will have access to your client file. Other consultants and agencies may be used in the course of my duties, who will have very limited access to the personal information I hold. These include computer consultants, bookkeepers and accountants, credit card companies, website managers, couriers, and lawyers. I restrict their access to any personal information I hold as much as is reasonably possible. I also have their assurance that they follow appropriate privacy principles.

#### **COLLECTION OF PERSONAL INFORMATION: PRIMARY PURPOSES**

Like all health care professionals, I collect, use and disclose personal information in order to serve my clients. For my clients, the primary purpose for collecting personal information is to provide massage therapy treatment. For example, I collect information about a client's health history, including their family history, physical condition and 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. A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services I can identify changes that are occurring over time.

#### **COLLECTION OF PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES**

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

- ❑ To invoice clients for goods and services that was not paid for at the time, to process credit card payments or to collect unpaid accounts.
- ❑ Massage therapists are regulated by the College of Massage Therapists of Ontario who may inspect my records and interview the Registered Massage Therapist as a part of their regulatory activities in the public interest. In addition, as a professional, I will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or my own. Also, I will 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., improper services). Also, like all organizations, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review my files and interview myself 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 some good/services provided by the organization to clients is paid for by third parties (e.g., private insurance). These third-party payers often have your consent to legislative authority to direct us 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 our goods or services after they have been received. I also provide ongoing services for many of my clients over a period of months or years for which my previous records are helpful. I retain our client information for a minimum of ten years after the last contact to enable me to respond to those questions and provide these services (our regulatory College also requires me to retain my client records for this period of time).

### **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 a locked area (locked filing cabinet; trunk of vehicle for mobile service during transportation to and from site).
- ❑ Paper information is transferred in sealed addressed envelopes or boxes and sent by Canada Post or a reputable courier.
- ❑ Electronic hardware is under supervision and password protected. All cell phones are digital, which signals are more difficult to intercept.
- ❑ I collect, use and disclose personal information only as necessary to fulfill my duties and in accordance with my privacy policy.
- ❑ External consultants and agencies with access to personal information must enter into privacy agreements with me.

## **DISCLOSURE OF PERSONAL INFORMATION**

I am requested at times to supply a photocopy of a client's file to lawyers or insurance companies. This request is only granted when a formal request is accompanied by the client's signature in person agreeing to the release of their information to that particular lawyer/insurance company. The following are the rare exception to the above:

- ❑ To the organization's lawyer,
- ❑ To comply with a subpoena, warrant or court order,
- ❑ At the request of a government institution for national security, law enforcement or administration,
- ❑ At the initiative of the organization, to provide information to a government institution or a specified investigative body relation to law enforcement or national security,
- ❑ At the initiative of a specified investigative body relating to law enforcement,
- ❑ Where disclosure is required by law.

## **RETENTION AND DESTRUCTION OF PERSONAL INFORMATION**

I need to retain personal information for some time to ensure that I can answer any questions you might have about the services provided and for my own accountability to external regulatory bodies.

In accordance with my College regulations, I keep my client files for ten years. Individuals from the client and contact directories will be deleted from the mailing list if it appears that I will not be contacting you again. However, if you ask, I will remove such contact information right away. I keep any personal information relating to my general correspondence (e.g., with people who are not clients), seminars and marketing activities for two years after the seminar or marketing activity is over.

I destroy paper files containing personal information by shredding or burning. 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. Often all you have to do is ask. 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 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 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 I may have formed. I may ask you to provide documentation that my file is incorrect. Where we agree that I made a mistake, I will make the correction and notify anyone to whom I sent this information. If

