

Policy

Objective: To provide clear policy and procedures related to protection of private information and electronic documents.

Privacy of personal information is an important principle to the Petworks Veterinary Hospital and Pet Resort (the "Company"). We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We also try to be open and transparent as to how we handle personal information.

WHAT IS PERSONAL INFORMATION?

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

WHO WE ARE

At the time of writing, the Company, includes three veterinarians and twenty-two support staff. We use a number of consultants and agencies that may, in the course of their duties have limited access to personal information we hold. These include computer and management consultants, office security and maintenance, accountants, temporary workers to cover holidays, credit card companies, website managers, and lawyers. We restrict access to any personal information we hold as much as is reasonably possible.

PRIMARY PURPOSES FOR COLLECTION OF PERSONAL INFORMATION

About Clients

Like all veterinarians, 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 veterinary services. For example, we collect information to open an account, collect a pet's history, physical condition and function in order to help us assess what their needs are, to advise of treatment options and then to provide the veterinary care chosen. A second primary purpose might be to obtain a baseline of health information so that, in providing ongoing veterinary services, we can identify changes that are occurring and a third primary purpose is to meet regulatory requirements.

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

About Members of the General Public

For members of the general public, our primary purposes for collecting personal information are to provide notice of special events (eg. a seminar or conference) or to make them aware of veterinary services in general or our clinic, in particular. For example, while we try to use work contact information where possible, we might collect home addresses, fax numbers and email addresses. We try to obtain consent before using any such personal information, but where this is not, for any reason, possible, we will, upon request, immediately remove any personal information from our distribution list.

On our website we only collect, with the exception of cookies, the personal information clients provide and only use that information for the intended purpose (eg. to respond to email messages, to register for a course, to subscribe to our newsletter). “Cookies” allow the customer to switch between secure and non-secure pages without signing in each time and are only used to help navigate our website and are not used to monitor clients.

About Contract Staff, Volunteers and Students

For people who are contracted to do work for us (eg. temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (eg. for new assignments) and for necessary work-related communication (eg. sending out paycheques, year-end tax receipts). Examples of the type of personal information we collect include home addresses, email addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of a health emergency or to investigate a possible breach of law (eg. theft). If contract staff, volunteers or students wish a letter of reference or an evaluation, we will collect information about their work related performance and provide a report as authorized by them.

RELATED AND SECONDARY PURPOSES FOR COLLECTION OF PERSONAL INFORMATION

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 and services that were not paid for at the time the services were rendered, to process Credit Care payments or collect unpaid accounts.
- ❖ To advise clients that their animals are due for scheduled veterinary services and to ensure a service that was performed has a proper outcome, is still appropriate for the current situation and to consider modifications or replacements where necessary
- ❖ To advise clients and others of special events or opportunities (eg. a seminar, development of a new service, arrival of a new product) that we have available.
- ❖ Our Company reviews client and other files for the purpose of ensuring the quality of our services, including assessing the performance of our staff. In addition, external consultants (eg. auditors, lawyers, practice consultants, accreditation programs) may, on our behalf, do audits and continuing quality improvement reviews of our Company, including reviewing client files and interviewing our staff.
- ❖ Veterinarians are regulated by the Nova Scotia Veterinary Medical Association who 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. Also, our organization believes that it should report information suggesting serious illegal behavior 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 (eg. improper services). Also, like all organizations, various government agencies (eg. Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) 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 (eg. lawyers, accountants) who will investigate the matter and report back to us.
- ❖ The cost of some goods/services provided by the Company to clients may be paid for by third parties (Insurance companies). These third-party payers often have the client's consent or legislative authority to direct us to collect and disclose them to certain information in order to demonstrate client entitlement to this funding.

- ❖ Clients 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 clients over a period of months or years for which our previous records are helpful. The Canada Revenue Agency and our regulatory association require us to retain our client information for a minimum of seven (7) years after the last contact.
- ❖ If the Company or its assets were to be sold, the purchaser would want to conduct a 'due diligence' review of the Company's records to ensure that it is a viable business that had been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting 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.

Clients can choose not to be a part of some of these related or secondary purposes (eg. by declining to receive notice of special events or opportunities or by paying for services in advance). We do not; however, have much choice about some of these related or secondary purposes (eg. external regulation).

PROTECTING PERSONAL INFORMATION

We understand the importance of protection personal information. For that reason, we have taken the following steps:

- 1) Paper information is either under supervision or secured in a locked or restricted area.
- 2) Electronic hardware is either under supervision or secure in a locked or restricted area at all times. Passwords are used on computers.
- 3) Paper information is transmitted in sealed, addressed envelopes or boxes by reputable companies.
- 4) Electronic information is transmitted through a direct line.
- 5) Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- 6) External consultants and agencies with access to personal information must enter into privacy agreement 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 about services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information for too long in order to protect client's privacy.

We keep our client files and electronic records for a minimum of seven (7) years after last contact.

We destroy paper files containing personal information by shredding. Our electronic client records are much more difficult to destroy and we may remove these records only with a medical record system purge; or, when hardware is discarded, we ensure that the hard drive is professionally cleaned.

CLIENTS CAN LOOK AT THEIR INFORMATION

With only a few exceptions, clients have the right to see what personal information we hold about them. Often all they have to do is ask. We can help to identify what records we might have. We will also try to help clients understand any information they may be unclear about (eg. short

forms, technical language, etc.). We will need to confirm the client's identity, if we do not know them, before providing access to personal information. We reserve the right to charge a nominal fee for such requests.

If there is a problem, we may ask the client to put their request in writing. If we cannot give access, we will tell them within 30 days if at all possible, and tell to the reason, as best we can, as to why we cannot give the requested access.

If clients believe there is a mistake in the information, they 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 clients to provide documentation that 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 still agree to include, in our file, a brief statement from the client on the point and we will forward that statement to anyone else who received the earlier information.

IF CLIENTS HAVE A QUESTION?

Our Information Officer, Kate Mills, can be reached at:

Petworks Veterinary Hospital & Pet Resort
850 Portland Street, Dartmouth, NS B2W 2N3
Phone: (902) 435-2444
info@petworks.ca

She will attempt to answer any questions or concerns you might have.

If a client wishes to make a formal complaint about our privacy practices, they may make it in writing to our Information Officer. She will acknowledge receipt of the complaint, ensure that it is investigated promptly and provide a formal decision and reasons in writing.

If a client has a concern about the professionalism or competence of our services or the mental or physical capacity of any of our professional staff, we ask them to address those concerns to our regulatory body:

Nova Scotia Veterinary Medical Association
15 Cobequid Road, Lower Sackville, NS B4C 2M9

This policy is made under the Personal Information Protection and Electronic Documents Act. This 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 reached at:

112 Kent Street, Ottawa, ON K1H 1H3
Phone: (613) 995-8210 / Toll Free: 1 800 282-1376 / Fax: (613) 6250 / TTY (613) 992-9190
www.privcom.gc.ca

Commentary:

1. While the duty of confidentiality relates to all discussions outside the hospital, including discussions with family members or spouses, care must also be taken within the hospital in

situations where discussions may be overheard by clients and visitors, including equipment repairmen.

2. Staff should take great care before leaving their work areas to ensure that no confidential materials are left available for view by unauthorized persons.
3. The duty of confidentiality extends even to admitting to anyone inquiring as to whether or not we, in fact, act for a particular client. Staff members should err on the side of not releasing that information unless they are satisfied that that information may be released.
4. Any staff member believed to have breached this policy will be given the opportunity to explain their conduct in the presence of the Owner(s) and/or Management who, after consideration, shall determine whether or not that staff member's employment shall be terminated for such a breach.