*This Policy describes how your personal and medical information may be used and disclosed and how you can get access to this information. Please review this carefully.*

This policy is made under the Personal Health Information Protection Act, a complex law instated by the provincial government to protect your Personal Health Information (PHI). There are some additional exceptions to the privacy principles that are too detailed to set out here. The practices are also in accordance with regulations set forth by the College of Chiropractors of Ontario.

**OUR PRIVACY PLEDGE**

This clinic is committed to maintaining the privacy of your Personal Health Information (HPI), which includes information about your health condition and the care you receive from the New Tec Health & Performance Clinic. This Privacy Policy explains how your PHI may be used and disclosed to third parties. This Private Policy also details your rights regarding your PHI. Other than the collection, use, and disclosures described within this Privacy Policy or other exceptions set forth by law, we will not sell or provide any of your PHI to any outside organization.

**TO WHOM DOES THE PRIVACY POLICY APPLY?**

This Privacy Policy applies to the all patients of New Tec Health & Performance Clinic.

**WHEN AND HOW TO WE OBTAIN YOUR CONSENT?**

We obtain your consent on your initial office visit. You must provide your consent to us in writing by signing our Consent For Personal Health Information form.

**WHAT IS PERSONAL HEALTH INFORMATION OR PHI?**

PHI is any information that can be used to identify you that is health or non-health related. This information may be personal factual characteristics including but not limited to your name, date of birth, gender, mailing address, phone number, email address, social media identifiers (including Twitter handle and Facebook profile), as well as health information including but not limited to past/current conditions, health history and past treatment at this facility and other facilities. PHIPA, the Personal Health Information Protection Act, a law decreed by the provincial government protects this information. It was instated to ensure “health information custodians” which includes chiropractors; keep personal health information confidential and secure, while allowing for the effective delivery of health care.

**EMPLOYEES OF NEW TEC HEALTH AND PERFORMANCE CLINIC**

New Tec Health & Performance Clinic employs an array of consultants and agencies that may in the course of their duties have limited access to PHI we have on file of our patients. Staff members include computer consultants, accountants, bookkeepers, cleaners, maintenance, credit card companies/banking, lawyers, clinic administration (including volunteers), and health care professionals including chiropractors. We restrict access to any PHI we hold as much as is reasonably possible. Our staff members realize the sensitive nature of PHI and we have their assurance that they follow and uphold appropriate privacy principals.

**WHY DO WE COLLECT PHI?**

Like all chiropractic and other health care clinics, we collect, use & disclose PHI in order to serve our patients. The primary purpose for collecting PHI is to ensure our patients’ are provided with the best care possible. We collect information about the patient’s health history, including their family history, physical condition, function and social situation in order to help us assess what their health needs are, to advise them of other healthcare options and to possibly provide them care they choose to have at our facility. In order to do that we will need PHI such as your phone number to coordinate and optimize scheduling between the patients and office staff. We may use and disclose PHI 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. (I.e. Personal, automobile insurance forms, and/or extended health care company claim submissions) We will also call the patient’s name in the reception area to direct them to their provider. Discussions between office staff and patients in the reception area could be overhead by others in the reception area as well.

**MEMBERS OF THE PUBLIC AND THEIR PHI**

Members of the general public may encounter our clinic by means of health fairs, clinic events, clinic outreach, community involvement, our website or social media. Our primary purpose for collecting PHI is to provide notice of special events, distribute our newsletter or to make the public aware of our services. Everything these members provide to us is voluntary and will be the only information we have on file about these members unless they become a patient in the future.

**WEBITE PRIVACY POLICY**

By visiting or using our website (www.newtechpc.com), you agree to the provisions of this Privacy Policy. If you do not agree to the terms of this Policy, please don’t use our site. Cookies, a standard practice amongst Web sites; these pieces of information in text format are downloaded when you visit any web site. Most Internet browsers permit a user to accept, decline or delete cookies. Your browser software may be set to reject all Cookies. If you reject our Cookies, certain functions of our site may not work properly. Apart from Cookies we will not collect any personal information of yours from our website unless provided by you. This includes, but not limited to, name, email address, phone number. For example, you voluntarily provide personally identifiable information when you send us an email, subscribe for our newsletter, answer surveys, etc. We use collected information to respond to emails or requests.

These pages may contain links to other sites such as social media. Please be aware that when you click on a link that takes you to another site, any information you provide, including financial information, is subject to the privacy policy of that site. New Tec Health & Performance Clinic is not responsible for the privacy practices of such sites. We advise you look for and review the privacy statements of every website you visit.

New Tec Health & Performance Clinic will not disclose any personally identifiable information that is gathered on our site except that which is set forth in this Privacy Policy. We reserve the right to disclose personally identifiable information to comply with valid legal requirements such as a law, regulation, search warrant, court order or when we believe that it is necessary to protect our rights. We may disclose to appropriate affiliates, to respond to a request for service or to provide information about available products or services, and to third party service providers. We may share non-personally identifiable information with certain third parties such as advertisers, market researchers, national industry organizations, and prospective affiliates.

**SOCIAL MEDIA**

Social media pages including but not limited to Twitter, Facebook, & Instagram may be utilized by the New Tec Health & Performance Clinic. Please note that these pages contain their own Privacy Policies and they should address any concerns you have. In general, these sites’ Privacy Policies are subject to change at any time without user’s permission. Any private information (including pictures, date of birth etc.) you disclose on your personal profile on these sites can be viewed by anyone. Disclosing this information on your personalized profile is at your own risk and can be accessed by advertisers, third party software developers or identity thieves, who can use your information for fraud purposes. New Tec Health & Performance Clinic is not responsible for any privacy breaches you encounter on these sites. We use Social Media for advertising, networking and informational uses only.

**LIMITATION OF LIABILITY**

Under no circumstances shall [www.newtechpc.ca](http://www.newtechpc.ca) or any of our social media sites be liable for any special, incidental, or consequential damages that results from the use of the information and materials on this site. The contents of this website including text, graphics, images, and other materials are provided for informational purposes only and is not intended to be a substitute for professional health advice, diagnosis, or treatment.

**OTHER USES OF PHI**

1. ***PAYMENT*** - To invoice or collect for goods or services received by the patient not paid for at the time of service.
2. ***APPOINTMENT REMINDERS*** - To remind patients of scheduled appointments or appointments that may have to be rescheduled to due unforeseen purposes. If you are not home, we will leave a message on your answering machine or with a message with the person that answers the call. No health information will be exchanged during these calls except the time and date of your appointment.
3. ***PATIENT INQUIRIES*** - To respond to inquiries made by the patient
4. ***PATIENT COMMUNICATION*** - Communication with patients may include letters, newsletters, telephone reminders or electronic reminders such as email. 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.
5. ***EMERGENT SITUATIONS-*** In the case of emergency situations the clinic may use and disclose PHI for the purpose of obtaining emergency treatment to you provided that the clinic attempts to obtain your consent as soon as possible. In the case of you become unconscious no consent will be obtained. The practice may also use and disclose PHI to a public or private entity authorized by law or by its charter to assist in disaster relief efforts, for the purpose of coordinating your care with such entities in an emergency situation.
6. ***PUBLIC HEALTH AUTHORITY*** - The clinic may use and disclose PHI when required by law to provide information to a public health authority at Public Health Ontario to prevent or control disease.
7. ***POSSIBLE SELF HARM OR DANGER TO OTHRE***S - The clinic may use and disclose PHI when authorized by law to provide information if a provider believes that the disclosure is necessary to prevent serious harm or death to oneself or others in accordance with PHIPA. If a provider suspects child abuse or they may be in need of protection a report to Children’s Aid Society (CAS) will be made in accordance with the Child and Family Services Act, 1990 (CFSA). If reasonable grounds to suspect that a resident of a nursing home or retirement home has suffered or will suffer harm due to improper or incompetent treatment of care, unlawful conduct, abuse, neglect, or misuse or misappropriation of a resident's money or funding the Registrar of the Retirement Homes Regulatory Authority will be notified in accordance with the Long Term Care Homes Act, 2007. If threats, aggression, or harm to one’s self or another person is made, 911 will be notified and PHI will be given.
8. ***CRIMINAL OR DISPLINARY ACTIONS*** - The clinic may use and disclose PHI when required by law to provide information in criminal investigations, disciplinary actions, or other activities relating to the community’s health care system. This includes judicial procedures such as subpoenas.
9. ***GOVERNING BODY & GOVERNMENT AGENCY AUDITS*** - Chiropractors are regulated by the College of Chiropractors of Ontario who may inspect our records and interview staff members as part of their regulatory activities to ensure practicing chiropractors are following the standard of practice and law. Furthermore, some government agencies such as the Canadian Revenue Agency 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.
10. ***THIRD PARTY PAYERS*** - he cost of some goods/services provided by our clinic to patients is paid by third parties (i.e., WSIB, HCAI, or extended health care companies). These third-party payers will 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 reimbursement or funding.
11. ***RECORDS RELEASE*** - We will retain our patients’ files for a mandatory minimum of 7 years since the last encounter date. These files can be accessed by the patient’s and forwarded on to other providers to aid in treatment, if requested. These requests must be given written form.
12. ***SALE OF PRACTICE*** - If New Tec Health & Performance Clinic were to be sold to a purchaser, they would have access to your PHI provided reasonable attempts are made to obtain your consent to do so. That being said, the purchaser would be a member of the College of Chiropractors of Ontario or other health care provider registered with their governing body. They would sign an agreement to uphold the PHI to the minimum standards of all applicable governing bodies professionally, provincially and federally.
13. ***AUTHORIZATION BY YOU*** ***OR YOUR LEGAL REPRESENTATIVE***- Uses and/or disclosures, other than those described above, will be made only with your written authorization. This could include the patient, a personal representative authorized by the patient, patient’s legal representative if patient is deceased. If the patient is deemed incapable of consenting to the collection, use and disclosure the authorization may come from the patient’s legal guardian, attorney for personal care or property, the patient’s spouse or partner, a child or parent of the patient, brother sister or other relative of the patient may have.

Some of these stipulations you can opt out of such as subscribing to our newsletter, or keeping your account current by ensuring payment at time of service. We will do our best to not expose you to certain stipulations when requested but this cannot be guaranteed; some of these purposes cannot be avoided but are in your best interest, such as governing bodies performing audits.

**PROTECTION OF PHI**

We understand the importance of protecting PHI. For that reason, we have taken the following steps.

* Paper information is either under constant supervision or secured in a locked or restricted area.
* Electronic hardware is either under supervision or secured in a locked or restricted are. Computers are password protected. Electronic medical record’s software is password protected and requires the provider to login. Our EMR is approved by the College of Chiropractors of Ontario and compliant with their privacy legislation.
* Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
* Electronic information is transmitted through a direct line.
* Staff is trained to collect, use and disclose PHI only as required to perform their duties and in accordance with our privacy policy.
* External consultants and agencies with access to PHI must enter into privacy agreements with us.

**RETENTION AND DESTRUCTION OF PHI**

The College of Chiropractors of Ontario requires practicing chiropractors to retain their records for a minimum of 7 years. If a patient is under the age of 18 when treated, their records must be retained for sevens years once they turn 18 years of age. We will be compliant with upholding these standards. We may hold onto your records for longer. You can request your records for a minimum of seven years after your last treatment date or seven years after a patient turns 18. Any records requested after the 7 seven-year allotment period may not be accessible.

Records will be destroyed in a secure manor so that they cannot be replicated or identifiable in any form.

**ACCESS TO YOUR PESONAL INFORMATION AND YOUR RIGHT TO AMMEND**

You have the right to see what PHI we have on file, we ask for a written request. We will also try to help you understand any information you do not understand. (i.e., short forms, technical language, etc.) We will need to confirm your identity before providing you with this access. We reserve the right to charge a minimal fee for such requests.

You have the right to request that we amend your health information for seven years from the date that the record was created or as long as the information remains in our files. We require your request to amend your records to be in writing with a reason to support the change you are requesting us to make. Documentation may be requested to make amendments to your file, as we like to keep our records as factual as possible. No changes to professional medical opinions will be made. If we agree that the change should be made we will correct the mistake in your file and notify any one who received the earlier incorrect information. If there is a disagreement, a note will be put in your file saying what information change was requested and reason for denial.

**WRITTEN REQUEST TIMELINE**

We will attempt to respond to each of your written requests in a timely manner and in most cases will be one or two business days. However, we reserve the right to take a maximum of 30 days after receipt of such requests to ensure the privacy of your PHI. We will advise you in writing if we cannot meet your requests within this time limit.

**QUESTIONS, COMMENTS OR CONCERNS**

If you have any questions or concerns, please contact.

Jamie Cranston DC

Health and Performance Center

30 Main St Alliston, ON L9R 1V1

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If you wish to make a formal complaint about our privacy policies, you may make it in writing to Jamie Cranston DC the Clinic Director at New Tec Health & Performance Clinic. She will acknowledge receipt of you complaint; ensure that it is investigated and a conclusion is met.

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
1-877-577-4772

 [www.cco.on.ca](http://www.cco.on.ca)

For more general inquiries regarding privacy legislation in the private sector the Information and Privacy Commissioner of Ontario can be contacted at:

Privacy and Information Commissioner of Ontario

112 Kent Street, Ottawa, ON K1A 1H3

PHONE: 1 800 282-1376

 www.privcom.gc.ca

This Privacy Policy is effective as of September 1, 2016. The current version of the policy will apply when you are treated as a patient or access our website. We reserve the right to change this policy from time to time without prior notice. Any such policy changes will be effective as of the date on which they are posted.