

## **Privacy Statement**

The Ministry of Health and Long-Term Care and the Office of the Privacy Commissioner stipulate that all Family Health Teams must be in compliance with Provincial Privacy Legislation, specifically Bill 31: The Personal Health Information Protection Act (PHIPA), which came into effect on November 1, 2004.

This is Harmony House Wellness Privacy Statement.

The practitioners and staff at Harmony House Wellness are bound by law and ethics to safeguard your privacy and the confidentiality of your personal information. We collect, use and disclose your personal health information to:

- treat and care for you;
- get payment for your treatment and care;
- plan, administer and manage our internal operations;
- conduct risk management and quality improvement activities;
- teach;
- conduct research;
- compile statistics;
- comply with legal and regulatory requirements and
- fulfill other purposes permitted or required by law.

Your request for care implies consent for our collection, use and disclosure of your personal information for purposes related to your care as noted above. All other purposes would require your express consent.

You have the right at any time to withhold or withdraw your consent to disclose personal health information. You will be required to sign the appropriate form which will be forwarded to the Privacy Officer.

Christine Moran, Privacy Officer  
Harmony House Wellness (within Yoga Source & Therapy Studio)  
16925 Yonge Street, Suite 25



## **Office Privacy Policy**

*This Policy is intended to reflect the content of Legislation including the Personal Health Information Act (PHIA) and the Personal Information Protection and Electronic Documents Act (PIPEDA) as well as Guidelines of the College of Homeopaths of Ontario.*

The Staff of Harmony House Wellness (HHW) will ensure the protection of the confidentiality of any personal health information (PHI) accessed in the course of providing patient care. We will only collect, use and disclose health information that is required for the purposes of providing care.

*Consent* is implied for the collection, use, and disclosure of PHI for ourselves and to other health professionals accessed in the routine process of care of patients associated with this clinic.

*Written* consent is required for PHI to be shared with a third party for reasons other than care and treatment. Consent can be withdrawn at any time.

Consequences of denying or withdrawing consent will be made clear to the patient.

All Staff are required to sign a confidentiality agreement.

### **RETENTION OF RECORDS:**

HHW will retain patient records as required by law, and regulation of the College of Homeopaths of Ontario. All charts are retained for a minimum of 10 years after the last entry, or 10 years after the patient has reached the age of majority.

### **DESTRUCTION OF RECORDS:**

HHW will destroy our records only after the requirements for retention have been fulfilled. Destruction will occur in a way that protects patient privacy in accordance with regulations made by the College of Homeopaths of Ontario

### **PATIENT ACCESS TO RECORDS:**

Requests for access to records can be made in writing to HHW. An estimate that reflects the cost of photocopying and the practitioner's time for reviewing the chart, will be provided to the patient.

Refusal of access to medical records will occur in the following circumstances:

- If the individual requesting access is someone other than the patient to which the record refers, with the exception being the legal guardian of a minor, unless written consent is obtained from the patient naming the specific designated individual or third party.
- If the information could reasonably endanger the mental or physical health or safety of the patient to which the record refers, or any other individual.<sup>[SEP]</sup>

- If the disclosure would reveal PHI about another person who has not consented to the disclosure.

Requests to view the original record, having met the above requirements, will be facilitated with a staff member present to maintain the integrity of the chart. This staff member will not be able to answer any questions related to PHI recorded in the chart, but will only be present to ensure the integrity of the record. There will be a fee for this process.

#### PROTECTION VIA COMMUNICATION:

**ANSWERING MACHINES / MESSAGES:** In the event that HHW needs to contact a patient for any reason and communication is occurring via an answering machine or through another individual via a message, the only information transferred by HHW Staff will be a request for a call back or a request to attend the office. Exceptions to this will include:

- If the patient is a minor and the telephone contact is made with the legal guardian
- If a consent to leave PHI on an answering machine or with another individual has been documented in the patient's record
- If the practitioner concludes there is a risk to personal health or safety that is grave enough to warrant breach of the patient's right to privacy.

**E MAIL:** All computer terminals are kept confidential by use of passwords, and any PHI that is sent or received via e-mail will contain a disclosure of confidentiality instructing the recipient to destroy the document and contact us in the event that it was sent to a non-intended recipient.

**POST / COURIER:** All mail, by whatever method, is sent indicating confidentiality. HHW will use certified medical carriers whenever possible, and sealed envelopes.

#### OFFICE ENVIRONMENT:

The medical records, photocopier and computers will be kept in areas to which the public is not granted access. Any mobile devices such as notebook computers, Palm Pilots or similar electronic items, as well as patient lists, notes etc. will be personally carried or password protected or physically locked.

Patients will be treated only behind closed doors to ensure privacy.

Corridor consultation between members of the health care team is discouraged and all verbal communication will occur in a secure area or without the use of names whenever possible.

## **Online Privacy Policy**

*This Privacy Policy governs the manner in which Harmony House Wellness collects, uses, maintains and discloses information collected from users (each, a “User”) of the <http://harmonyhousewellness.ca/> website (“Site”). This Privacy Policy applies to the Site and all products and services offered by Harmony House Wellness.*

### **Personal Identification Information**

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site, place an order, subscribe to the newsletter, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, phone number, credit card information. Users may, however, visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

### **Non-Personal Identification Information**

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

### **Web Browser Cookies**

Our Site may use “cookies” to enhance User experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

### **How we use Collected Information**

Harmony House Wellness may collect and use Users personal information for the following purposes:

To improve customer service

Information you provide helps us respond to your customer service requests and support needs more efficiently.

To personalize user experience

We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.

To improve our Site

We may use feedback you provide to improve our products and services.

To process payments<sup>[SEP]</sup> We may use the information Users provide about themselves when placing an order only to provide service to that order. We do not share this

information with outside parties except to the extent necessary to provide the service.  
To run a promotion, contest, survey or other Site feature

To send Users information they agreed to receive about topics we think will be of interest to them.

To send periodic emails;<sup>SEP</sup>We may use the email address to send User information and updates pertaining to their order. It may also be used to respond to their inquiries, questions, and/or other requests. If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or User may contact us via our Site.

### **How we Protect Your Information**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

Sensitive and private data exchange between the Site and its Users happens over a SSL secured communication channel and is encrypted and protected with digital signatures. Our Site is also in compliance with PCI vulnerability standards in order to create as secure of an environment as possible for Users.

### **Sharing Your Personal Information**

We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

### **Third Party Websites**

Users may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

### **Advertising**

Ads appearing on our site may be delivered to Users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile non personal identification information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This privacy policy does not cover the use of cookies by any advertisers.

## **Google AdSense**

Some of the ads may be served by Google. Google's use of the DART cookie enables it to serve ads to Users based on their visit to our Site and other sites on the Internet. DART uses "non personally identifiable information" and does NOT track personal information about you, such as your name, email address, physical address, etc. You may opt out of the use of the DART cookie by visiting the Google ad and content network privacy policy at [http://www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html)

## **Compliance with Children's Online Privacy Protection Act**

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information at our Site from those we actually know are under 18, and no part of our website is structured to attract anyone under 18.

## **Changes to this Privacy Policy**

Harmony House Wellness has the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our Site, revise the updated date at the bottom of this page and send you an email. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

## **Your Acceptance of These Terms**

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

## **Contacting us**

If there are any questions regarding this privacy policy you may contact us using the information below:

ATTN: Christine Moran, Health Information Custodian  
Harmony House Wellness  
Located within Yoga Source & Therapy Studio  
16925 Yonge Street, Unit 25  
Newmarket, Ontario  
L3Y 905-830-9700  
[info@harmonyhousewellness.ca](mailto:info@harmonyhousewellness.ca)