

PRIVACY POLICY

Privacy of personal information is an important principle to *Kanata Massage Therapy*. 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. This document describes our privacy policies.

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WHAT IS PERSONAL INFORMATION

Personal information is information about an identifiable individual. Personal information includes information that related to their personal characteristics (e.g. gender, age, health conditions, home address or phone number, ethnic background, family status), their health (e.g., religion, politics, opinions expressed by an individual, and opinion or evaluation of an individual). Personal information is to be contrasted with business information (e.g. an individuals business address and telephone number), which is not protected by privacy legislation.

WHO ARE WE

Our organization, *Kanata Massage Therapy*., includes at the time of writing, five massage therapists. 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 consultants, office security and maintenance, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, website managers, and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

WE COLLECT PERSONAL INFORMATION:PRIMARY PURPOSE

About Clients

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 contact you to place, receive and deliver orders and collect payment. For example, we collect information about a client's name, address, phone number and email address in order to help us assess what their needs are, to advise them of their options and then to provide the products they choose to order. It would be rare for us to collect such information without the clients express consent, but this might occur in an emergency (e.g. the client is unconscious) or where we believe the client would consent is asked and it is impractical to obtain consent (e.g. 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 purpose for collecting personal information is to provide notice of special events (e.g. a special or advertisement) or to make them aware of our products and services general. For example, while we try to use your preferred 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 possible we will upon request immediately remove any personal information from our distribution list.

On our website we only collect the personal information you provide and only use that information for the purposes you gave it to us (e.g., to respond to your email message, to place an order).

About Contract Staff, Volunteers and Students

For people who are contracted to do work for us (e.g., temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., for new assignments) and the type of personal information is to ensure we can contact them in the future (e.g., sending out checks, year end tax receipts). Examples of the type of personal information we collect for these purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of health emergency (e.g., SARS outbreak) or to investigate a possible breach of law (e.g., if a theft were to occur at the Company Office). 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.

WE COLLECT PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES

- o To invoice clients for goods and services that were not paid for at the time, to process credit card payments or collect unpaid accounts.
- o To advise clients that their product or service should be reviewed
- o To advise clients and others of special events or opportunities (e.g., specials, development of a new service) that we have available
- o Our office reviews clients and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing improvement reviews of our company, including reviewing customer files and interviewing our staff.
- o 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. 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 professional (e.g., lawyers, accountants) who will investigate the matter and report back to us.
- o 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.
- o If the Company and its assets were to be sold, the purchaser would want to conduct a "due diligence" review of the clients records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all the personal information confidential. Only reputable purchasers who have already agreed to buy the organization's business or its asset's would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be a part of some of these related or secondary purposes (e.g., by declining to receive notice of special events or opportunities). We do not however, have much choice about some of these related or secondary purposes (e.g., external regulation)

PROTECTING PERSONAL INFORMATION

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

- o Paper information is either under supervision or secured in a locked or restricted areas.
- o Electronic hardware is either under supervision or secured in a locked or restricted area. In addition, passwords are used on all computers.
- o Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- o Electronic information is transmitted through a direct line.
- o Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- o External consultants and agencies with access to personal information must enter into policy agreements 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 you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our clients files for seven years. Our clients and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and when the hardware is discarded, we ensure that the hard drive is physically destroyed. Alternately, we may send some or the entire client file to our clients.

YOU CAN LOOK AT YOUR INFORMATION

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

DO YOU HAVE A QUESTION?

Our information Officer, Wendy Parker, can be reached at:

Email: kantamassagetherapy@gmail.com

Phone: 613-599-0901

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

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. She will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

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.

This policy is made under the Personal Information Protection and Electronic Documents Act. That is a complex Act and provides some additional exception to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above. 1,

For more general inquires, 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:

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