

PRIVACY POLICY FOR SANDI WILLIAMS NUTRITION AND DIABETES COUNSELLING

Privacy of personal information is an important principle to Sandi Williams Nutrition and Diabetes Counselling Service. I am committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services that I provide. I also try to be open and transparent as how I handle personal information. This document describes my privacy policies.

WHAT IS PERSONAL INFORMATION?

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

WHO WE ARE

Sandi Williams Nutrition and Diabetes Counselling, is a sole proprietorship with one Registered Dietitian. I may use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information I hold. These include computer consultants, office security, maintenance, bookkeepers and accountants, cleaners and lawyers. We also have their assurance that they follow appropriate privacy principles.

WE COLLECT PERSONAL INFORMATION: PRIMARY PURPOSES

I collect, use and disclose personal information in order to serve MY clients. I collect information about your health history, your physical condition and function, and your social situation in order to help assess what your needs are, to advise you of your options and then to provide the health care that you choose to have. Also I collect information about your health history to obtain a baseline of health and social information so that in providing ongoing health care I can identify changes that are occurring over time. At no time do I rent, sell, barter, exchange or distribute my membership list to any third party for commercial purposes.

WE COLLECT PERSONAL INFORMATION: RELATED & SECONDARY PURPOSES

I collect, use and disclose information for purposes related to or secondary to my primary purposes such as:

- To invoice clients for goods or services that were not paid for at the time, to process credit cards payments or to collect unpaid accounts.

- Client files may be reviewed for the purpose of ensuring that high quality services are provided. External consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may on my behalf do audits and continuing quality improvement.
- Regulatory bodies such as, College of Dietitians of Ontario, may inspect my records as a part of their regulatory activities in the public interest.
- Third parties (private insurance) may cover the cost of some services provided to clients. These third-party payers often have your consent or legislative authority to direct us to collect and disclose certain information in order to demonstrate the client entitlement for this funding.
- Clients we deal with may have questions about services after they have been received. Client information is retained for a minimum of seven years, after the last contact to enable us to respond to those questions and provide these services.

PROTECTING PERSONAL INFORMATION

I understand the importance of protecting personal information, and for that reason, I have taken the following steps:

- Electronic information is transmitted either through a direct line or is encrypted.
- Electronic hardware is either under supervision or secured in a restricted area at all times, and passwords are used on computers.
- Paper information is either under supervision or secured in a restricted area, and is transmitted through sealed, addressed envelopes by reputable companies

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 services provided and for my own accountability to external regulatory bodies.

I keep our client files for 10 years. Client and contact directories are much more difficult to systematically destroy, so I remove such information when I can if it does not appear that I will be contacting you again.

I destroy paper files containing personal information by shredding. 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; also I will try to help you understand any information that you do not understand (e.g., short forms, technical language, etc.).

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 we may have formed. I may ask you to provide documentation that my files are wrong. Where we agree that I made a mistake, I will make the correction and notify anyone to whom I sent this information. If we do not agree that I have made a mistake, we will still agree to include in our file a brief statement from you on the point and I will forward that statement to anyone else who received the earlier information.

DO YOU HAVE A QUESTION?

You can ask your question from Sandi Williams and I can be reached at:
504-1407 Yonge Street,
Toronto, ON, M4T 1Y7
Phone (416) 924-9119

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

If you wish to make a formal complaint about my privacy practices, you may make it in writing. I will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reason in writing.

If you have a concern about the professionalism or competence of my services, I would ask you to discuss those concerns with me. However, if I cannot satisfy your concerns, you are entitled to complain to our regulatory body.

This policy is made under the *Personal Information Protection and Electronic Documents Act*. For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector, and can be reached at:

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Phone (613) 995-8210 | Toll free 1-800-282-1376 | Fax (613) 947-6850