



Privacy Policy

Dr. Andrew Matthew and Dr. Margus Heinmaa are the directors of Change Clinic. They are professionally responsible for all clients and patients who receive services at Change Clinic either from themselves directly or from their Clinical Associates.

Privacy of personal information is an important principle to all of us at Change Clinic. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

What is personal information?

Personal information is information about an identifiable individual. It includes:

- An individual's personal characteristics (e.g. gender, age, income, home address or phone number, ethnic background, family status)
- Health (e.g. health history, health conditions, health services received); or activities and views (e.g. religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual)

Who we are

Change Clinic is an organization that includes: Psychologists, Clinical Associates, and administrative support staff.

We work with a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include, for example, computer consultants, office security and maintenance, bookkeepers and accountants, 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.

Collection of personal information: related and secondary purposes

Like most organizations, we collect, use and disclose information for purposes related to, or secondary to, our primary purposes. For example:

- providing copies of reports and relevant documents
- invoicing for goods or services or collecting unpaid accounts
- reviewing client 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 quality improvement reviews of our clinic including reviewing client files and interviewing staff. Psychologists are regulated by the College of Psychologists of Ontario who may inspect our records and interview our staff as 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.

Change Clinic will report information suggesting serious illegal behaviour 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 (e.g. improper services). Various government agencies (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 part of their mandates. In these circumstances, we may consult with professionals (e.g. lawyers, accountants) who will investigate the matter and report back to us.

The cost of many goods/services provided by Change Clinic is paid for by third parties (e.g. auto insurance, extended health benefit insurance). These third-party payers often 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 funding. You should be aware that only relevant information will be provided to a third party paying for our services, and that this information will only be used to advance your assessment or treatment as needed. Such disclosure does not represent a waiver of our therapist-client confidentiality. Clients or other individuals we deal with may have questions about our goods or services after they have been received. We provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services. Our regulatory College requires us to retain our client records.

If Change Clinic or its assets were to be sold, the purchaser would want to conduct a due diligence review of the clinic's records to ensure that it is a viable business. 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 would have to 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 prior to finalizing the purchase.

Protecting Personal Information

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

- All Change Clinic patient information is stored either in paper or electronic form. Paper documents are either under the supervision of an employee or secured in a locked or restricted area at all times. Electronic data is stored in a Cloud-based storage system located in Canada. The Cloud-based storage is protected by a sophisticated encryption system which uses complex algorithms to encode information. As well, authentication processes (including usernames and passwords) and authorization practices are in place to further protect information stored in the Cloud. Finally, no patient information is stored or saved on mobile devices.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy
- Disclosures are only made to our own representative and within the requirements of privacy legislation (with your consent, to your own treatment providers, etc.). No disclosures of personal health information will be made to people outside the circle of care of treatment providers and your own representative without your consent

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 or external regulatory bodies. We keep our client files for at least ten years. When they are no longer required we destroy paper files containing personal information by shredding. We destroy electronic information by deleting it.

You can look at your information

With only a few exceptions, you have the right to see what personal information we hold about you. We can identify records we might have about you and help with any information you do not understand (e.g. short forms, technical language, etc.). We reserve the right to charge a nominal fee for such requests.

If there is a problem we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if possible and tell you the reason as to why we cannot provide access.

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. We may ask you to provide documentation that

our 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 will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

Do you have a question?

Our Information and Privacy Coordinator, Dr. Andrew Matthew, can be reached at our office:

180 Bloor Street West, suite 1204, Toronto, ON M5S 2V6, (416) 944-9292 DrMatthew@ChangeClinic.ca

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information and Privacy Coordinator. He will acknowledge receipt of your complaint, ensure that it is investigated promptly and provide you with a formal written decision.

If you have a concern about the professionalism or competence of our services or staff, we ask you to contact Dr. Heinmaa or Dr. Matthew. They can be reached at:

180 Bloor Street West, suite 1204, Toronto, ON M5S 2V6, (416) 944-9292

DrHeinmaa@ChangeClinic.ca

DrMatthew@ChangeClinic.ca

If we cannot satisfy your concerns you are entitled to complain to our regulatory body:

The College of Psychologists of Ontario

110 Eglinton Avenue West, suite 500, Toronto, ON M4R 1A3

Tel: (416) 961-8817 1-(800) 489-8388 Fax: (416) 961-2635

www.cpo.on.ca

This policy is made under the Personal Information Protection and Electronic Documents Act and the Personal Health Information Protection Act. PIPEDA and PHIPA provide some additional exceptions to the privacy principles set out here.

For more general inquiries, the Information and Privacy Commissioner of Ontario oversees the administration of the privacy legislation for personal health information. The Commissioner can be reached at:

2 Bloor Street East, suite 1400, Toronto, ON M4W 1A8

Tel: (416) 326-3333 1-(800) 387-0073 Fax: (416) 325-9195 TTY (416) 325-7539

www.ipc.on.ca