

# Personal Information and Privacy Policy

## Current Revision: Sept 1, 2019

This policy addresses the collection, use, disclosure and security of your personal information. We are committed to collecting, using and disclosing your personal information in a responsible manner. Any questions, comments or issues pertaining to this policy should be forwarded to Dr. Ahmed at (403) 440-1234 or riaz@missioneyecare.ca

### Policy Summary:

The health information that we are collecting is needed to determine your eligibility for the services provided by Mission Eye Care, its doctors, and staff under section 27 of the Health Information Act. It is collected under the authority of the Alberta Health Care Insurance Act and/or section 20(b) of the Health Information Act – directly related to and necessary to carry out an authorized purpose. The confidentiality of this health information and your privacy are protected by the provisions of the Health Information Act (HIA) and the Personal Information Protection Act (PIPA).

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### Section A. What is Personal Information

Personal information is information about an individual. It includes information that relates to your personal characteristics (e.g. gender, age, income, home address, phone number(s), ethnic background, religion, family status, etc.), or your health (e.g. health history, health conditions, health services, etc.).

Your business information, when used for business contact purposes (e.g. address, phone number, etc.), is not considered personal information and therefore is not affected by privacy legislation.

### Section B. Collection of Information

Personal information is collected by us primarily as the result of us being engaged by an individual for the purposes of providing products or services. At the time our services are engaged, we will request information from an individual such as:

- Full name, phone numbers, mailing address, email address, date of birth, PHN, and other general contact and billing information such as 3<sup>rd</sup> party insurance
- Medical history, medications, allergies, name of family physician and other health care providers, and other pertinent information necessary for the doctors to provide a reasonable and appropriate level of care.

If you send or receive email, web form, fax, phone, or paper based messages to us, we will collect and archive those communications for future reference. This is done to facilitate appropriate service, and improve our ability to interact and react to our ongoing relationship. We may also use this information in the event of a medical audit.

### **Section C. Use and Maintenance of Information**

Information collected about you will be used specifically to complete the service that you have requested. We will maintain copies of the information gathered for up to ten (10) years, or as required by law.

For other types of information, we will document and archive your information for as long as we have an ongoing relationship. At the time that our relationship is terminated, we will maintain copies of all information collected for a period of ten (10) years as documentation in the eventuality that you or other professionals require that information for your care, or to resolve a dispute of any nature. At the end of the six-year time period, your information will be destroyed or your personal contact information will be deleted and the sum of the information (which would now be anonymous) will be added to a permanent archive of business statistical information for our use.

Mission Eye Care will use the information collected about you only for the purpose for which it was originally collected, and to facilitate our ongoing relationship. Examples of this ongoing use would be:

- Provision of eye care services and products.
- Sharing pertinent information with other medical professionals directly involved in your care and/or insurers or 3<sup>rd</sup> party payers you have identified.
- Notices to you regarding orders, appointments, recalls and promotions.

Mission Eye Care utilizes a 3<sup>rd</sup> party EMR provider that will store and maintain some of your information on behalf of Mission Eye Care. This information is stored on secure servers and your name is dissociated from your health information for security. With your express consent, this information will be used to communicate such information as appointment reminders, recalls and order statuses. If you so wish, you may access this information yourself via a secure login that will be provided to you. You may opt out of these communications at any time in compliance with CASL legislation. This provider has no direct access to identifiable health information and acts only to maintain these records on behalf of our organization.

If at any time you feel that our records are inaccurate, or that your information has been used for a purpose other than that intended, please contact our privacy officer at [riaz@missioneyecare.ca](mailto:riaz@missioneyecare.ca), or by contacting us at the address contained at the end of this policy.

### **Section D. Access to Information**

You have the right to access the information that we collect about you. You may request at any time that you be given access to view the information, and recommend to us any corrections that should be made.

After receiving a request, we will contact you within five (5) business days to arrange a date and method for providing you with the access you have requested. In most cases we will be able to provide you with this information by fax if we can verify your identity, otherwise we will request that you appear in person at our offices, at which time a member of our staff will assist you in viewing the requested material.

If you believe that there is an error in the information we have on file about you, you can request, in writing, that our privacy officer review and correct the information as necessary. When you file your submission, you should include a copy of the updated, correct information. The privacy officer will verify the authenticity of the submitted documents, as well as their validity for our purposes prior to updating our records.

There is a fee for obtaining copies of your medical file in accordance with HIA. To request access to your information, please contact us at [info@missioneyecare.ca](mailto:info@missioneyecare.ca), by telephone at (403) 440-1234, by fax at (403) 440-1237 or by contacting us at the address contained at the end of this policy.

### **Section E. Nondisclosure of Personal Information**

Mission Eye Care will not disclose your personal information to anyone or any organization not directly involved in your health care without your explicit permission, except in the circumstance where that information is required in an emergency situation, where that information is requested as the result of a court order or a request from law enforcement agencies in conjunction with an ongoing investigation.

With respect to your health information, we will release only the information required to have other health professionals provide an appropriate level of care.

In the specific circumstances where we need to exchange your information with another organization to complete the service you have engaged us to complete, we will formally request your authorization in writing, by telephone or by email. The authorization received will be kept on record and used only for the purpose it was intended.

If you have questions or concerns about the disclosure of your personal information, or if you believe your information has been improperly disclosed to another organization, contact us at [riaz@missioneyecare.ca](mailto:riaz@missioneyecare.ca), or at the address contained at the end of this policy.

### **Section F. Collection and Use of Non-Personal Information**

Mission Eye Care is dedicated to the proper use of all information collected.

Information that is "non-personal" (see the definition in section A), may be collected at any time from a variety of sources. This information may be used for accounting, statistical and marketing purposes.

### **Section G. Security**

Mission Eye Care makes all reasonable efforts to protect your information.

We employ different levels of security. Much of the information that we collect about you will be stored by computer locally on electronic media. Our premises are locked and monitored by 24 hour on-site and remote security. Any portable or removable media is encrypted. As noted in section C, some of your personal information is stored by a 3<sup>rd</sup> party on off-site, encrypted servers in a non-identifiable format. In addition, much of your information will be backed up on 3<sup>rd</sup> party encrypted storage servers. All storage access is password protected in addition to firewalls and other hardware and software safeguards. We may utilize paper media which remain on the premises at all times.

While it is highly unlikely, in the event that a breach of security were to occur that involved your information, Mission Eye Care will notify you within fourteen (14) business days, so that you can take any appropriate actions based on nature of the security breach.

Reasonable safeguards will be taken whenever paper and electronic records are destroyed or deleted. Every reasonable effort will be made to ensure that no record remains after destruction.

### **Section H. Disclaimer**

Mission Eye Care makes no representations, guarantees or warranties beyond what has been specifically outlined in this document.

## **Section I. Contact Information**

You may contact the privacy officer of Mission Eye Care as follows:

To review your personal information, or request correction of your personal information:

Mission Eye Care  
180, 2206-2 Street SW  
Calgary, AB T2S 3C5  
Phone (403) 440-1234  
Fax (403) 440-1237  
Email: [riaz@missioneyecare.ca](mailto:riaz@missioneyecare.ca)

More general inquiries should be directed to:  
The Alberta Government Privacy Help Desk – [privacyhelpdesk@gov.ab.ca](mailto:privacyhelpdesk@gov.ab.ca)