

## Ottawa Valley Veterinary Professional Corporation

### Personal Information Policy

#### *Introduction*

The Personal Information Protection and Electronics Documents Act (“PIPEDA”) is a federal legislation which came into effect on January 1, 2004. Ottawa Valley Veterinary Professional Corporation complies with PIPEDA and is committed to respecting the privacy right of all individuals, including client and employees by ensuring that their personal information is collected, used and disclosed in an appropriate manner. This document describes our Personal Information Policy.

#### *What is Personal Information?*

Personal information is information about and identifiable individual. It includes information that relates to their personal characteristics (home address, gender, phone number), their health (health history, health conditions) and their activities and views (opinions expressed, politics, religion). Personal information is to be contrasted with business information, which is not protected by the privacy legislation.

#### *Who We Are*

Our organization, Ottawa Valley Veterinary Professional Corporation, includes at the time of writing 8 veterinarians and 19 support staff working out of facilities in Morrisburg, Winchester and Osgoode. 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, cleaners 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 policies.

#### *Primary Purposes for Collection of Personal Information*

##### ABOUT CLIENTS

Like all veterinarians, 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 provide veterinary services. For example, we collection information about your animal’s history, physical condition and function on order to help us assess what their needs are, to advise you of your options and then provide the veterinary care you choose. A second primary purpose might be to obtain a baseline of health information so that in providing ongoing veterinary services, you can identify changes that are occurring. A third primary purpose is to meet regulatory requirements for veterinarians as outlined by The Veterinarian’s Act and the College of Veterinarians of Ontario.

It would be rare for us to collect such information without a client's express consent, but this might occur in an emergency or where we believe the client would consent if asked and it is impractical to consent (e.g., a family member passing a message on from our client and we have no reason to believe that the message is not genuine).

#### ABOUT MEMBERS OF THE GENERAL PUBLIC

For members of the general public, our primary purposes for collecting personal information are to provide notice of special events, or to make them aware of veterinary services in general or in our clinic in particular. For example, while we try to use business contact information where possible, we may collect home addresses, fax numbers and e-mail addresses. We try to obtain consent before using such personal information, but where this is not, for any reason, possible, we will upon request remove any personal information from our distribution list.

#### ABOUT CONTRACT STAFF, VOLUNTEERS AND STUDENTS

For people who are contracted to do work for us, our primary purpose for collecting personal information is to ensure we can contact them in future (e.g. for new assignments) and for necessary work-related communication (e.g. sending out paycheques, year-end tax receipts). Examples of the type of information we collected for those 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 a health emergency or to investigate a possible breach of the law (e.g. if a theft were to occur in the clinic) 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.

#### *Related and Secondary Purposes for Collection of Personal Information*

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- ❑ To invoice clients for goods and services that were not paid for at the time, to process credit card payments or to collect unpaid accounts.
- ❑ To advise clients that their animals are due for scheduled veterinary services and to ensure a service that was performed has a proper outcome, is still appropriate for the current situation and to consider modifications or replacement where necessary.
- ❑ To advise clients and other of special events or opportunities that we have available.
- ❑ Our clinic reviews client and other files for the purpose of ensuring the quality of our services including the performance of our staff. In additions, external consultants many on our behalf do audits and continuing quality improvement

- reviews of our clinic(s), including reviewing client files and interviewing our staff.
- Veterinarians are regulated by the College of Veterinarians 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 any serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. Also our organization believes that it should 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). Also, like all organizations, various government agencies 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 some goods/services provided by Ottawa Valley Veterinary Professional Corporation to clients may be paid for by third parties (insurance companies) These third-party payer 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.
  - Clients or other individuals we deal with many 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. We retain our client information for a minimum of 10 years after the last contact to enable us to respond to those questions and provide these services (our regulatory College also requires us to retain our client records).
  - If Ottawa Valley Veterinary Professional Corporation or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the Clinic’s record to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence many 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 written promise to keep all personal information confidential. Only reputable purchasers who 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 search prior to closing the purchase.

You can choose not the part of some of these related or secondary purposes (e.g. by declining to receive notice of special events or opportunities, by paying for your services in advance). We do not, however, have much choice about some of these related of 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:

- ❑ Paper information is either under direct supervision or is secured in a locked or restricted area.
- ❑ Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All our cell phones are digital, which signals are more difficult to intercept.
- ❑ Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- ❑ Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- ❑ Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties in accordance with our privacy policy.
- ❑ External consultants and agencies with access to personal information must enter into privacy agreements with us.

### *Retention and Destruction of Personal Information*

We need to retain our 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 client files for 10 years. Our client 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 information right away. We keep any personal information relating to our general correspondence (i.e. People who are not clients) newsletter, seminars and marketing activities for 6 months after the newsletter ceases publication or a seminar or marketing activity is over.

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. Alternatively, we may send some or all of the client file to our client.

### *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.

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 at all possible and tell you the reason, as best we can, as to why we cannot give you 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 the 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 Officer, Dr. Devin Hunt, can be reached at:

Box 535, Winchester, ON, K0C 2K0  
Phone: (613) 774-2159, Fax: (613) 774-5995

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. He will acknowledge receipt of your complaint, ensure that 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. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory body:

College of Veterinarians of Ontario  
2106 Gordon St.  
Guelph, Ontario  
N1L 1G6  
[www.cvo.org](http://www.cvo.org)

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

For more general inquiries, 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:

112 Kent Street, Ottawa, Ontario K1A 1H3  
Phone (613) 995 81210, 1-800-282-1376, Fax (613) 947-6850, TTY (613) 992-9190  
[www.privcom.gc.ca](http://www.privcom.gc.ca)