

# PRIVACY POLICY

## *PURE DENTAL HYGIENE CARE PRIVACY POLICY*

At PURE Dental Hygiene Care we are committed to providing our patients with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our patients, protecting their personal information is one of our highest priorities.

Ontario's Personal Information Protection Act (PIPA) came into effect on January 1, 2004 and sets out the ground rules for how businesses may collect, use and disclose personal information.

We will inform our patients of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting patient's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our patient's personal information and allowing our patients to request access to, and correction of, their personal information.

### **COLLECTING PERSONAL INFORMATION**

Unless the purposes for collecting personal information are obvious and the patient voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

#### **We will only collect patient's information that is necessary to fulfill the following purposes:**

- To verify identity
- To verify creditworthiness
- To identify patient preferences
- To understand the [financial, banking, insurance] needs of our patients
- To open and manage an account
- To deliver requested products and services
- To provide medical, dental, counselling services
- To ensure a high standard of service to our patients
- To comply with legal and regulatory requirements to the College of Dental Hygienists of Ontario when required, according to the provisions of the Regulated Health Professions Act

**When you visit our website, we automatically collect the information sent to us by your computer,**

**mobile device or other equipment that provides access. This information includes, but is not limited to:**

- Information from your interaction with our website, including, but not limited to, device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from *puredentalhygienecare.com*, referring URL, ad data, IP address and standard web log information
- Information we collect through cookies, web beacons and similar technologies

**We collect and store any information you enter onto our website, or use our Contact Form, or use our Appointment Request Form. This information includes, but is not limited to:**

- Information that you provide to us when you use our Contact Form
- Information that you provide to us when you use our Appointment Request Form
- Additional information that you may provide to us through social media sites or third-party Services
- Information about your location and the location of your device, including your device's unique identifier information if you have enabled this service on your mobile device

We may receive or collect additional information about you from third parties and add this to our account information. This information includes, but is not limited to: demographic data, navigation data, additional contact data and additional data about you from other sources, such as public authorities, to the extent permitted by the law.

## **CONSENT**

We will obtain patients consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

Consent can be provided [e.g., orally, in writing, electronically, through an authorized representative] or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the patients voluntarily provides personal information for that purpose.

Consent may also be implied where a patient is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the patients does not opt-out.

Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), patients can withhold or withdraw their consent for PURE Dental Hygiene Care to use their personal information in certain ways. A patient's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a service or product. If so, we will explain the situation to assist the patients in making the decision.

**We may collect, use or disclose personal information without the patient's knowledge or consent in the following limited circumstances:**

- When the collection, use or disclosure of personal information is permitted or required by law

- In an emergency that threatens an individual's life, health, or personal security
- When the personal information is available from a public source (e.g., a telephone directory)
- When we require legal advice from a lawyer
  - For the purposes of collecting a debt
  - To protect ourselves from fraud
  - To investigate an anticipated breach of an agreement or a contravention of law

## **USING AND DISCLOSING PERSONAL INFORMATION**

**We will only use or disclose patient's personal information where necessary to fulfill the purposes identified at the time of collection [or for a purpose reasonably related to those purposes such as:**

- To conduct client, customer, member surveys to enhance the provision of our services
- To contact our patient directly about products and services that may be of interest

We will not use or disclose patient's personal information for any additional purpose unless we obtain consent to do so.

**We will not sell patients lists or personal information to other parties [unless we have consent to do so].**

**By visiting our website, or by using our Contact Form, or by using our Appointment Request Form, you agree that we may use your personal information for the following purposes:**

- To personalize, measure, and improve our content and ads
- To contact you, by e-mail, push notification, text message (SMS) or by telephone, to inquire about our Services to targeted marketing activities, retargeting campaigns, updates, and promotional offers, or for any other purposes as set forth in this Personal Information Protection Policy

By visiting our website, we may place Cookies (data files on your phone or mobile device's drive) or web beacons (electronic images that are placed in a web page's code) or similar technologies. We use cookies to help us identify you as a user, to provide you a better experience on our website, to remain present via retargeting campaigns, to measure promotional effectiveness and to ensure trust and safety on our website.

## **RETAINING PERSONAL INFORMATION**

If we use patients personal information to decide that directly affects the patients, we will retain that personal information for at least one year so that the patients have a reasonable opportunity to request access to it.

We will retain patient's personal information only if necessary to fulfill the identified purposes or a legal or business purpose.

#### **ENSURING ACCURACY OF PERSONAL INFORMATION**

We will make reasonable efforts to ensure that patient's personal information is accurate and complete where it may be used to decide about the patients or disclosed to another organization.

Patients may request correction to their personal information to ensure its accuracy and completeness.

A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the patient's correction request in the file.

#### **SECURING PERSONAL INFORMATION**

We are committed to ensuring the security of a patient's personal information to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

We will use appropriate security measures when destroying a patient's personal information such as shredding documents, deleting electronically stored information.

We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.