

## Privacy Policy

### ***Introduction***

Protecting our patients' privacy and the confidentiality of their information — through our offices, the internet, or telephone — is fundamental to the way we function at Santé Highbury Dental. This Privacy Policy and related procedures is intended to guide and direct the handling of the personal information we collect. We have created this privacy statement in order to demonstrate our firm commitment to protecting the privacy of our patients, their families and visitors to our website. This policy is consistent with the Canadian Standards Association *Model Code for the Protection of Personal Information* (CSA Model Code) and the applicable federal privacy legislation known as the *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

### ***Defining Statement***

This policy deals only with personal information handled by Santé Highbury Dental. Personal information is defined as information about an identifiable individual, excluding business contact information. The following policy and related procedures explain how that information is handled, used and/or distributed. Santé Highbury Dental may find it necessary to update this policy periodically. Should any update create a change in how we use patients' personal information, notification will be provided.

### ***Accountability***

Santé Highbury Dental is accountable for all personal information under its control and a privacy officer has been designated as the person responsible for this policy.

The privacy officer can be reached by:

- E-mail: [dremons@santedental.ca](mailto:dremons@santedental.ca)
- Telephone: 519-455-5620
- Fax: 519-455-2172
- Mail: 1550 Highbury Ave. N. London ON N5Y 5N7

Any questions about Santé Highbury Dental's handling of personal information should be directed to the privacy officer. Please see below for more information about the process for referring questions about the handling of personal information.

### ***Purpose of Collecting Personal Information***

The purpose for which Santé Highbury Dental collects personal information will be identified at or before the time the information is collected. These purposes are limited and identified in the document entitled "How our Office Collects and Discloses Personal Patient Information" consent form, which is an integral part of this policy.

Santé Highbury Dental will not use personal information for any other purpose than identified at or before the time of collection.

## **Consent**

Santé Highbury Dental seeks consent for all personal information we collect, use and disclose through information provided to individuals prior to, or at the time of collection.

If you have voluntarily provided information, you have consented to the collection, use and disclosure of your personally identifiable information as described in this privacy policy. As required by the *CSA Model Code*, Santé Dental will not use personal information for any purpose other than that for which you consented. Should personal information be required for a new purpose, we will contact you to seek consent for that new use.

## ***Limits for Collecting, Using, Disclosing and Retention of Personal Information***

Santé Highbury Dental does not collect, use or disclose personal information of individuals except when individuals give consent and provide the information on a voluntary basis. Should there be occasions where more specific personal information is necessary for us to proceed with a request for information, treatment or service, we will provide you with the reason for the information required. We collect only information that is voluntarily provided by you and undertake that such information will be kept strictly confidential.

We retain personal information only as long as is necessary to provide the individual with the requested product, service or information and delete or destroy this information after that time. When legal reporting and retention requirements necessitate, Santé Dental may keep information for a specific amount of time. In general, this information is retained for a period not longer than two years.

Santé Highbury Dental does not sell or trade any personal information with third parties. We may transfer information to service providers where information processing is outsourced by us in the course of carrying out administrative procedures. Where personal information is accessed or transferred to a service provider (example: I.T. Specialist) for processing, we require the service provider to respect this Privacy Policy and we restrict them from using or disclosing personal information accessed by them for any purpose other than that specific provision of service they provide to us. Any personal information that Santé Dental retains is kept in such a manner as to ensure its security and confidentiality at all times.

## ***Safeguarding Personal Information***

Santé Highbury Dental respects the privacy of our patients, their families, website visitors and internet users and will protect that privacy as vigorously as possible. We store personal information in electronic and physical files that are secure. Our security measures include: secure locks on filing cabinets, and using industry standard techniques such as firewalls, encryption, intrusion detection and restricted access to records and to equipment, including computers. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or receive from us electronically. This is especially true for information you transmit to us via e-mail. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make every effort to ensure its security on our servers.

## ***Accuracy of and Access to Personal Information Collected***

Santé Highbury Dental makes every effort to keep personal information as accurate, complete, current and relevant as necessary for the identified purposes. We make this Privacy Policy and related procedures for managing personal information readily available to individuals and provide access to them in electronic and written form. Any questions about the handling of personal information by Santé Dental can be raised with our privacy officer.

Upon receiving a written request an individual may view or edit their personal information as collected by us. Santé Highbury Dental will inform them of what personal information we have about the individual, what it is being used for and, in cases where it has been disclosed, to whom it has been disclosed.

Should there exist exceptional circumstances, as provided by the *CSA Model Code*, under which the Santé Dental may not be able to give an individual access to the personal information about her or him held us, we will explain the reason, as provided by the *CSA Model Code*.

To make a request, please send a letter, e-mail or fax, addressed to our Privacy Officer at the address indicated above. In your request, please include the following information: Name, contact details, proof of identity documentation, the nature of your request, including whether you wish to view and/or edit information or inquire regarding use and/or disclosure.

Santé Dental will promptly respond to your request within 10 business days after receipt of the request, or if we are not able to respond within this time period, we will communicate a request for the courtesy of an extension. If we are not able to disclose all the personal information we hold on you, we will give you a reason for our inability to do so, unless prohibited by law.

If you are dissatisfied with the response to your request, you may seek further information from the Privacy Commissioner of Canada. We have included all the necessary contact information below.

**Postal Address:** Privacy Commissioner of Canada  
112 Kent Street Ottawa,  
Ontario K1A 1H3

**Website:** [www.priv.gc.ca](http://www.priv.gc.ca)

**General Inquiries:** Phone: 613-995-8210  
Toll Free: 1-800-282-1376  
Fax: 613-947-1376

### **Questions**

Any questions or comments about Santé Highbury Dental handling of personal information should be directed to our privacy officer.