

PRIVACY POLICY

of

WILLOWS DENTAL

Dr. Christine Miller
Dr. Kristopher Milne
Dr. Abdullah Patel

1) INTRODUCTION

- a. This privacy policy is revised as of: March 5, 2024.
- b. The *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 (PIPEDA) governs how organizations collect, use, and disclose personal information of individuals in the course of business.
- c. *The Health Information Protection Act*, S.S. 1999, c. H-0.021 (HIPA) governs how trustees collect, use, and disclose personal health information of individuals in the course of providing health services.
- c. This privacy policy is intended to provide information on the way in which Willows Dental uses, collects, and discloses the personal information and personal health information of its clients and customers.
- d. Information that Willows Dental requires in order to carry out its services to clients and customers will be documented and stored in a secure manner. Willows Dental collects only that information that is required for the provision of services and nothing more. Our business to our clients and customers includes the following and is the reason for which we require personal information and personal health information:

Personal information such as medical history, insurance information, health card number, treaty card number, address, phone numbers, and email addresses are collected from patients in order to provide dental treatment; prepare insurance claims; prepare correspondence and referrals to medical or dental specialists; prepare prescriptions for pharmacies or dental labs; mail out statements; and confirm appointments.
- e. Willows Dental always ensures to protect the personal information and personal health information of its clients while in the course of business.
- f. The Office of the Saskatchewan Information and Privacy Commissioner oversees PIPEDA/HIPA and addresses complaints by individuals.

2) COLLECTION AND CONSENT

a. Collection of personal information is classified as an individual's name, age, address, phone number, email address, medical history, health card number, and more. This information constitutes personal health information when collected in the course of providing, or incidental to providing, health services to an individual.

b. Consent can be either express or implied.

c. Willows Dental obtains express consent from its clients and customers. This consent is obtained from our patients by way of a signed medical health questionnaire.

d. Willows Dental makes attempts to collect information directly from our clients and customers but may need to collect information indirectly from other sources, when necessary, all of which is completed in a legal manner consistent with PIPEDA/HIPA.

e. Legal exceptions to having to obtain consent include as follows:

- If asking for express consent has the effect of compromising the accuracy of the information;
- Collection of information is in the best interests of our client or customer;
- Information is in a witness statement and the collection is needed to settle an insurance claim;
- To comply with the law, including warrants, subpoenas, and investigations.

f. Clients and customers may withdraw their consent. This withdrawal may be subject to certain restrictions depending on the circumstances. If that's the case, reasonable notice may be required.

3) PURPOSE OF COLLECTION

a. Willows Dental needs to collect personal information and personal health information from its clients or customers in order to properly and accurately represent its clients and customers, and such, in accordance with PIPEDA/HIPA. Information also needs to be collected for the following purposes:

- Accurately send and receive insurance predeterminations and claims;
- Correspond with medical health providers and dental specialists;
- Confirm appointments;
- Provide health services.

b. The information that we collect may also include information of other entities with whom our clients or customers conduct business. This may be needed in order to facilitate our services to our clients and customers.

c. Any changes in the use of the information that we collected shall be done with the express consent of our clients and customers. This means that if we collected client information for a certain purpose and later needed to conduct a separate, unrelated matter for the same client, we will obtain the client's consent prior to using the information for the separate, unrelated matter.

4) USE AND DISCLOSURE OF INFORMATION

a. Personal information and personal health information provided to Willows Dental by its clients and customers may need to be disclosed to third parties in order for us to properly represent and act in our clients' and customers' best interests. Only the information required by a third party is disclosed in order to complete the tasks for which the information was needed. This may include, for example, having to disclose personal information to a government authority in order to register our client or customer with a regulatory government body.

b. Information may need to be disclosed in the narrowest of circumstances to facilitate our engagement.

c. When information is provided to us, whether upon our request or not, the delivery of such information is deemed to be done with consent, and Willows Dental may collect, use, and disclose that information.

d. Notwithstanding the foregoing, our clients' and customers' personal information and personal health information shall be treated with the strictest confidence, and thus, any personal information shall not be disclosed without consent, unless otherwise required by law. However, as a professional bound by a code of conduct, such code may require the disclosure of personal information pursuant to such code under certain circumstances.

e. In accordance with our professional obligations, rules and regulations, Willows Dental may be subject to audit by its professional governing body. Such an audit may require the disclosure of sensitive client information. Auditors and file reviewers are subject to the same code of confidentiality, and therefore client or customer information shall not be disseminated.

5) SECURITY AND RETENTION OF INFORMATION

a. Pursuant to our professional code of conduct, we are required to retain information of our clients and customers in accordance with the terms therein. We adhere to the requirements of our professional code of conduct. Where our professional code of conduct permits, we will only retain personal information for as long as it is necessary to complete the tasks for which we were retained.

b. When it is reasonable and legal to do so, Willows Dental shall discard all of our clients' and customers' personal information, whether digitally stored or otherwise, and shall comply with applicable law in doing so.

c. During the destruction process, all information that Willows Dental holds shall be kept confidential, and Willows Dental will ensure that destruction is carried out in a manner that protects the privacy of information.

6) SAFEGUARDING INFORMATION

a. Employees of Willows Dental will not read, use, or disclose information in any patient record unless required for patient care, or to fulfill their job responsibilities. Employees will not disclose any patient information to anyone except in accordance with the clinic's policies or as directed by a Privacy Officer.

b. Willows Dental is a paperless office and will protect electronic records by ensuring all computers with patient information are password protected and all systems are backed up daily on a local secure server, as well as off-site. These systems are also maintained and checked regularly.

c. Willows Dental ensures that all of the hardware is password-protected.

d. Workplace policies are in place which prohibit Willows Dental from clicking on any form of spam mail, suspicious messages, or access to malicious websites.

e. Personal devices and hardware of employees and staff at Willows Dental is prohibited unless specific authorization is requested and subsequently granted.

f. Cyberattacks and/or data breaches are taken very seriously, and we ensure to maintain strong firewalls and applications to prevent malicious cyber threats and other data breaches that may compromise the confidential nature of the sensitive information we keep on file.

7) REQUEST FOR ACCESS TO OR REVISION OF INFORMATION OR COMPLAINTS

a. Individuals have the right to submit a written request to have their information removed from the records of Willows Dental, to access and verify their information, or to make a complaint about Willows Dental's privacy practices. Where permitted by law, we will respond to any request in the timeframe provided for under PIPEDA/HIPA.

b. Access may not be granted in certain circumstances, including the following:

- Information protected by solicitor-client privilege;
- Information that could be reasonably expected to reveal confidential commercial information;
- Information disclosed to law enforcement;

- Information produced in a formal dispute; and
- All other exceptions under PIPEDA/HIPA.

c. Information that clients or customers have with Willows Dental may be corrected and amended upon written request. Notice must be provided with the updated information so that our records can be duly updated to reflect the changes. Once the changes are made, we shall also provide notice to relevant third parties and keep them informed.

d. Personal information maintained is kept accurate, up-to-date, and complete. Individuals may challenge any information that is incorrect or incomplete by giving notice to Willows Dental. However, only information that is necessary for purposes related to the collection of the information in the first place shall be changed by Willows Dental.

e. The Office of the Saskatchewan information and Privacy Commissioner can also be contacted for any complaints.

8) CONTACT

Should you have any questions or concerns regarding this privacy policy, or the manner in which information is stored or kept confidential, do not hesitate to contact Willows Dental using the below contact information. We shall respond to inquiries as soon as practicable. For inquiries with specific timelines established under PIPEDA/HIPA, we shall adhere to those criteria.

Willows Dental

#60-304 Stonebridge Blvd
Saskatoon, SK
S7T 0J1

306-244-2266

reception@willowsdental.ca