

# Carolynn Younghusband B.A., RHC, RMT, RYT, CFT Privacy Policy

# **Written Statement of Privacy Policy**

Carolynn Younghusband, Elixir Wellness provides Holistic Health and Wellness Services including but not limited to ~ Registered Massage Therapy, massage therapy, Ayurvedic treatments, Registered Holistic Health Coaching, Reiki, Yoga, Fitness training, Earthing Wellness Retreats.

We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. Protecting the privacy and the confidentiality of patient/client personal information is important to Carolynn Younghusband, Elixir Wellness and her employees.

We strive to provide our patients/clients with excellent health and wellness care and service. Every member of Carolynn Younghusband, Elixir Wellness must abide by our commitment to privacy in the handling of personal information. This policy was last modified on the 1st day of January, 2019. This document describes our privacy policies.

## What is Personal Information?

Personal Information is defined as any information that identifies you or provides a method by which your identity could be deduced.

## **Types of Personal Information collected:**

- an individual's personal characteristics (e.g., gender, age, income, home address or telephone number, ethnic background, family status);
- health (e.g., health history, health conditions and health services received for them);
- or activities and views (e.g., opinions expressed by an individual, an opinion or evaluation of an individual).

Personal Information is different from business information (e.g., an individual's business address and telephone number). This is not protected by privacy legislation.

## **Purpose of Collecting Personal Information**

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

- Our clinic reviews clients and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g., auditors, practice consultants) may on our behalf do audits and continuing quality improvements reviews of our Clinic, including reviewing client files and interviewing our staff.
- Registered Massage Therapists are regulated by the college in Ontario. The College of Massage Therapists may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, as professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. Our organisation 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., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission have the authority to review our files and interview our staff as a 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.

# [Optional Section - do not have online purchasing]

When you make a purchase through elixirwellness.ca we ask for your name, address phone number, email address and other personal information necessary to fulfill and track your order. For purposes of billing, you will need to provide your credit card type, number, expiration date and billing address for the card.

For your privacy and security, credit card numbers are not stored in the system.

## **Your Information and Third Parties**

We do not rent, sell or exchange your name or other personally-identifiable information to third-party companies for any purposes. Under no circumstances will your personal information be disclosed to any third-party unless we seek your express consent or are required to do so by law.

#### Consent

You have the right to determine how your personal health information is used and disclosed however, in all circumstances express consent must be written.

Despite the consent directive; healthcare providers may override the consent directive in certain circumstances, such as emergencies.

#### **Email List**

When you book an appointment with us, we ask you at the time of booking for your email address as we send out confirmation, reminder and clinic information emails with our appointment bookings. Once you voluntarily give us your email address, we will only use it to communicate appointment bookings, cancellations, changes and periodic short and informative newsletters contains holiday hours and info on any events or promotions we are offering.

Each email will contain simple instructions on how to subscribe (opt-out) from the list, if it does not then please contact our office directly to request having your email contact changed or removed.

We are committed to following and upholding the Canadian Federal Privacy Legislation. Never will we exchange, lend or sell our email mailing list to anyone. Information submitted to us is only available to employees managing this information for purposes of sending you emails and to contracted service providers for purposes of providing services relating to our communications with you.

# **Privacy Policy Changes**

Carolynn Younghusband, Elixir Wellness may deem it necessary or appropriate from time to time to modify this privacy policy to reflect changes in the way Carolynn Younghusband, Elixir Wellness collects or uses information or changes in privacy-related laws, regulations, or industry standards. Accordingly, Carolynn Younghusband, Elixir Wellness reserves the right to change this privacy statement at any time by posting the revised policy. Information will be handled according to the privacy statement in effect at the time the information is used.

Carolynn Younghusband, Elixir Wellness does not sell, share, barter, rent, divulge or otherwise disseminate personal information.

# **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 supervision or secure in a locked or restricted area. Electronic hardware is either under supervision or secure in a locked or restricted area at all times. In addition, passwords are used on computers.
- Electronic information is transmitted with through a direct line or has identifiers removed or is encrypted.
- Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants or agencies with access to personal information must enter into privacy agreements with us.

We protect your information with appropriate safeguards and security measures. The Practice maintains personal information in a combination of paper and electronic files. Recent paper records concerning individuals' personal information are stored in files kept onsite at our office. Older records may be stored securely offsite.

Access to personal information will be authorized only for Carolynn Younghusband, and her employees associated with the Practice, and other agents who require access in the performance of their duties, and to those otherwise authorized by law.

We provide information to health care providers acting on your behalf, on the understanding that they are also bound by law and ethics to safeguard your privacy. Other organizations and agents must agree to abide by our Privacy Policy and may be asked to sign contracts to that effect. We will give them only the information necessary to perform the services for which they are engaged, and will require that they not store, use or disclose the information for purposes other than to carry out those services.

### **Retention and Destruction of Personal Information**

We need to retain personal information for some time to ensure that we can answer any questions the clients may have about services provided and for our own accountability to external regulatory bodies. We keep our client's files for ten (10) years according to the College of Massage Therapists. We destroy paper files containing personal information by shedding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

## **Access to Your Information**

With only a few exceptions, you have the right to see what personal information we hold about you. 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 access. 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 this information. If we do not agree that we have made a mistake, we will agree to include in out file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

# **Contacting the Privacy Officer**

This policy addresses some of the main privacy concerns that you might have. If you have concerns regarding Carolynn Younghusband's Privacy Policy or questions about your compliance with the PIPEDA guidelines contact:

Carolynn Younghusband at 416 320 6908

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at: 112 Kent Street
Ottawa, ON K1A 1H3
1-800-282-1376

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 your concerns with us. However, if we cannot satisfy your concerns, you are entitled to issue a formal complaint to our regulatory body: College of Massage Therapists of Ontario 1-800-465-1933

# **Changes to this Privacy Policy**

Because of the ever-changing nature of the online medium and the world around us, Carolynn Younghusband, Elixir Wellness may change this policy from time to time. Changes will occur without warning and they will be reflected on this page.

The Practice has prepared this plain-language Privacy Policy to keep you informed. You may view a copy by visiting our website at www.elixirwellness.ca

If you have any additional questions or concerns about privacy, we invite you to contact us at elixirwellness.ca@gmail.com and we will address your concerns to the best of our ability.

If, after contacting us, you feel that your concerns have not been addressed to your satisfaction, you have the right to complain to the Information and Privacy Commissioner/Ontario.

The Commissioner can be reached at: 2 Bloor Street East, Suite 1400 Toronto, Ontario M4W 1A8 1-800-387-0073 1-416-325-9195 (fax)

