



# Cornerstone Occupational Therapy Consultants

## CORNERSTONE OCCUPATIONAL THERAPY CONSULTANTS

### PRIVACY POLICY

#### CORNERSTONE OCCUPATIONAL THERAPY CONSULTANTS

**Privacy Policy Officer: Ruth Duggan MScOT, OT Reg. (N.S.)**  
**P.O. Box 33084, Quinpool Road,**  
**Halifax, Nova Scotia**  
**B3L 4T6**  
**Phone: 902-446-4660 x23**  
**Fax: 902-446-7999**  
**Email: Ruth@CornerstoneOT.com**

**CORNERSTONE OCCUPATIONAL THERAPY CONSULTANTS** recognizes the importance of privacy and the sensitivity of personal information. As occupational therapists, we have a professional obligation to keep confidential all information we receive within a relationship. We are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

From January 1, 2004 all businesses engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act, and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to occupational therapists, including Cornerstone Occupational Therapy Consultants. The Act gives you rights concerning the privacy of your personal information.

We are responsible for the personal information we collect and hold. To ensure this accountability, we have developed this policy.

#### ***What personal information do we collect?***

Personal information is any information that identifies you, or by which your identity could be deduced.

We are required to collect and use relevant personal information in order to provide you with occupational therapy services, and to comply with the Nova Scotia Occupational Therapy Act and College of Occupational Therapy of Nova Scotia's Standards of Practice.

#### ***How do we collect your personal information?***

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect your personal information directly from you, at the start of, and in the course of our relationship.

Sometimes we may obtain information about you from other sources, for example:

PO Box 33084, Quinpool Road  
Halifax, Nova Scotia B3L 4T6  
www.CornerstoneOT.com

Telephone 902-446-4660  
Fax 902-446-7999  
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- your insurance company;
- your medical practitioner;
- another treating health professional;
- your employer, if we are acting for you, at its request;
- your hospital.

### **Consent**

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally, we ask for your consent in writing, but in some circumstances, we may accept your verbal permission to collect this information. Sometimes, your consent may be implied through your conduct with us.

### **Use of Your Information**

We use your personal information to provide occupational therapy services to you and to complete billing and administration tasks. We may include you in any direct marketing activities. If you tell us that you no longer wish to receive information about our services, or about new developments in the profession, we will not send any further material.

We do not disclose your personal information to any third party to enable them to market their products and services. For example, we do not provide our client mailing lists to other occupational therapists.

### **Disclosure of your Personal Information**

Under certain circumstances, we will disclose your personal information to a third party:

- when we are required or authorized by law to do so, for example if a court issues a subpoena;
- when you have consented to the disclosure;
- when occupational therapy services that we are providing require that we give your information to a third party; your consent will be implied unless you tell us otherwise;
- where it is necessary to establish or collect fees;
- if we engage a third party to provide administrative services to us (like computer back-up services or archival file storage) and in this circumstance the third party is bound by our privacy policy;
- if the information is already publicly known.

### **Updating Your Information**

Since we use your personal information to provide occupational therapy services to you, it is important that the information be accurate and up-to-date.

If during the course of our relationship, any of your information changes, please inform us so that we can make any necessary changes to our files.

### **Is My Personal Information Secure?**

We take all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- restricted file access to personal information;
- passwording and encrypting electronic documents;
- shredding of sensitive, confidential materials.

**Access to Your Personal Information**

You may ask for access to any personal information we hold about you.

Summary information is available on request, in writing. More detailed requests which require archive or other retrieval costs may be subject to our normal professional and disbursement fees.

**Correcting Errors**

If there is information about you and you can establish that it is not accurate, complete and up-to-date, we will take reasonable steps to correct it.

**Can I be Denied Access to My Personal Information?**

Your rights to access your personal information are not absolute.

We may deny access when:

- granting you access would have an unreasonable impact on other people's privacy;
- protecting our firm's rights and property;
- the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we shall explain why.

We do not use your Social Insurance Number as a way of identifying or organizing the information we hold upon you.

**Communicating with Us**

You should be aware that e-mail is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.

**Changes to this Privacy Policy**

Since we regularly review all of our policies and procedures, we may change our Privacy Policy from time to time.

**Requests for Access**

If you have any questions, or wish to access your personal information, please write to our Privacy Contact at the address noted above.

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street,  
Ottawa Ontario, K1A 1H3  
1-800-282-1376

Policy Reviewed on 20 September 2019 by Ruth Duggan, and on 21 September 2019 by Lisa Saunders-Green