

Our Privacy Policy

Policy: We are committed to protecting the privacy of all personal information under our control in a manner that is appropriate to the sensitivity of the information and compliance with all applicable legislations.

Purpose: To safeguard all personal information under our control collected from persons served, employees and stakeholders in a manner that is appropriate to the sensitivity of the information, and to promote responsible and transparent personal information management practices in a manner consistent with the provisions of provincial and federal regulations (PIPEDA, PIPA etc.).

Principle 1 – Accountability

We are responsible for personal information under our control and shall designate an individual or individuals who are accountable for the organization's compliance.

What does this mean for our business? We will:

- Be accountable for its compliance with provincial and federal privacy regulations.
- Communicate the name and title of our Privacy Officers internally and externally.
- Explain our policies and procedures regarding privacy and personal information.
- Analyze our business practices for handling personal information.
- Ensure comparable levels of protection are in place in any third party organizations that we may use to process personal information.
- Implement policies and practices to adhere to these 10 privacy principles to protect the privacy of personal information.
- Train staff about our policies and procedures respecting personal information.

Principle 2 - Identifying Purpose

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

What does this mean for our business? We will:

- Identify the purposes for which personal information is collected prior to, or at the time of, collection, including any purposes that may not be obvious. This may be done verbally or in writing.
- Identify new purposes for use *prior* to use. An individual's consent must be obtained for the new use, except under specific and limited circumstances.
- Review the personal information you have in your custody and ensure that it is required for a specific purpose.

- Train members of staff to be able to explain the purposes for which information is collected.
- Indicate that, in exceptional circumstances, an individual's consent is not required, e.g. where required by law.

Principle 3 – Consent

The knowledge and consent of the individual is required for the collection, use, or disclosure of personal information, except where inappropriate.

What does this mean for our business? We will:

- Obtain consent from the individuals from whom information is being collected prior to, or at the time of collection, before use or disclosure. This may be done in a number of ways (e.g. in writing, verbally, by check-off boxes).
- Wherever possible, seek express consent, especially for the use or disclosure of personal information where that information is sensitive.
- Record the individual's consent.
- Do not make consent a condition for supplying a product or service, unless the information is required to fulfill a specific purpose.
- Identify new purposes and gain consent to those uses *prior* to use. An individual's consent must be obtained prior to the new use.
- Communicate in a manner that is clear and can be reasonably understood.
- Provide individuals with an opportunity to refuse their consent.
- Properly document and ensure any revoked consent is honored and communicated appropriately to all direct parties involved.
- We will not require an individual to consent to the collection, use or disclose information beyond what is necessary to provide the product or service.

Principle 4 - Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization and as is permitted by law. Information shall be collected by fair and lawful means.

What does this mean for our business? We will:

- Collect only the amount and type of information necessary to fulfill the purposes already identified.
- Information shall be collected by fair and lawful means.
- Personal information that is no longer required to fulfill identified purposes, will be destroyed accordingly.
- We will make every effort to ensure that there is no unauthorized disclosure of personal information. In the event a breach does occur, we will document, contain the breach,

evaluate the risk and notify the parties involved/affected. If appropriate, the authorities will be notified.

Principle 5 - Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

What does this mean for our business? We will:

- Destroy, erase or make anonymous personal information that is no longer needed for its identified purposes or for legal requirements.
- Develop guidelines and implement procedures to govern the retention and destruction of personal information.
- Obtain consent for any new purpose of collection, use or disclosure.
- Document any new purpose.

Principle 6 - Accuracy

Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

What does this mean for our business? We will:

- Update personal information only if it is necessary to fulfill the purposes for which the information was collected.
- Make reasonable efforts to keep personal information used on an ongoing basis accurate and up-to-date.
- Provide third parties with information that is as accurate and up-to-date as possible and clearly indicate the limits of its accuracy (e.g., valid for a six month period).

Principle 7 - Safeguards

Security safeguards appropriate to the sensitivity of the information shall be implemented to protect personal information.

What does this mean for our business? We will:

- Implement security safeguards appropriate to the sensitivity of personal information held. This includes implementing physical, organizational and technological controls to safeguard the information.
- Institute employee training to heighten awareness of the importance of maintaining the confidentiality of personal information.

Safeguards must also be applied to the disposal or destruction of personal information.

Principle 8 - Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

What does this mean for our business? We will:

- Provide the public with easy to understand information on how your organization manages personal information, including information on:
 - the name or title and address of the person responsible for protecting the privacy of personal information;
 - how individuals can gain access to their personal information;
 - a description of the type of personal information held and a general statement of its use, including whether it is made available to related organizations; and
 - a copy of any brochures or other material explaining our privacy policies and procedures, standards and codes.

Principle 9 - Individual Access

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

What does this mean for our business? We will:

- Respond to individual requests to access their own information within a reasonable time and at minimal or no cost to the individual.
- Provide the information requested in a form that is generally understandable.
- Put in place procedures to correct inaccurate or incomplete personal information.
- Record any disputes over amending files and provide this information to third parties where appropriate.

Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for our compliance.

What does this mean for our business? We will:

- Put in place procedures to deal with complaints and inquiries.
- Communicate its policies.



- Investigate every complaint and take each seriously, then take corrective action to address those that are justified (e.g. amend deficient policies and practices).

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