

BAYVIEW WELLINGTON VETERINARY CLINIC'S PERSONAL INFORMATION POLICY

INTRODUCTION

The *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) is federal legislation which came into effect on January 1, 2001. This veterinary facility (Bayview Wellington Veterinary Clinic) complies with PIPEDA and is committed to respecting the privacy rights of all individuals, including clients and employees, by ensuring that their personal information is collected, used and disclosed in an appropriate manner.

This veterinary facility collects personal information about its clients for purposes of effectively communicating with, and providing veterinary medical services to, its clients. This veterinary facility also collects personal information about its employees for purposes of personnel management and administration.

The principals established in the personal information policy of this veterinary facility conform with the fundamental requirements with PIPEDA. This personal information policy may be amended if the province of Ontario enacts privacy legislation in the future, to ensure that this policy conforms with such legislation.

POLICIES

1. Accountability

This veterinary facility is responsible for all personal information under its control. An owner of this veterinary facility will designate an individual who will be accountable for compliance with the personal information policy and procedures. The individual will be known as the “Privacy Officer”.

This veterinary facility is committed to protecting personal information, and accordingly will include an appropriate level of protection in any dealings with third parties who receive personal information from this veterinary facility.

This veterinary facility will ensure that its clients, employees and other interested individuals have the opportunity to review and update their personal information on file with this veterinary facility. All such persons will be advised that questions and concerns can be directed to the Privacy Officer.

2. Identifying the Purposes for Collection of Personal Information

This veterinary facility will identify the purposes for which it collects, uses or discloses personal information. The primary purposes for such collection, use or disclosure of personal information will relate to the delivery of quality veterinary medical services to our clients.

Common purposes for the collection, use or disclosure of personal information include:

- i. to maintain complete and accurate client files, and to comply with all

requirements of the College of Veterinarians of Ontario and the *Veterinarians Act* and regulations thereto;

- ii. to provide goods and services to our clients, to communicate effectively with our clients, and to communicate and work with third parties providing veterinary medical or other services to our clients (including insurance companies which pay for all or part of the cost of such services, boarding facilities and grooming facilities);
- iii. to bill for goods and services and to collect unpaid accounts;
- iv. to permit a potential buyer of this veterinary facility to carry out due diligence to confirm factual and other information about our business;
- v. to comply with lawful requests from governmental agencies such as Canada Customs and Revenue Agency and the Ontario Human Rights Commission; and
- vi. to maintain complete and accurate personnel files.

This veterinary facility may identify additional purposes that arise for the collection, use or disclosure of personal information. This veterinary facility will communicate such additional purposes to its clients and interested individuals, if it is practical or appropriate in the circumstances to do so.

3. *Consent*

This veterinary facility will obtain the consent from individuals for the collection, use or disclosure of their personal information. This veterinary facility will make every effort to obtain the express consent from an individual in writing through the use of a retainer or engagement agreement or other written document. There may be situations where implied consent is given by an individual. Implied consent will not be in writing, but the circumstances relating to the provision of implied consent shall be such that a reasonable person would conclude that the individual has consented, or would consent, if asked, to the collection, use or disclosure of his or her personal information. There may be situations where consent is given verbally, either in person or over the telephone. Individuals providing personal information to us through a website or email communication will be considered to have consented to the collection, use or disclosure of such information in accordance with this policy.

The consent of an individual, whether express or implied, may be withdrawn at any time.

4. *Limitations on the Collection of Personal Information*

This veterinary facility will only collect personal information which is necessary for the purposes which have been identified. Personal information shall be collected by fair and lawful means, and will not be collected for unspecified or improper purposes.

5. *Limitation on the Use, Disclosure and Retention of Personal Information*

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual providing the personal information or except where use or disclosure is required by law. This veterinary facility will establish appropriate criteria for the retention of personal information.

6. *Accuracy*

This veterinary facility will make every reasonable effort to ensure that personal information collected by it will be as accurate, complete and up-to-date as possible for the purposes for which the information is to be used.

This veterinary facility will on an ongoing basis make every effort to ensure the accuracy and completeness of personal information under its control.

7. *Safeguards*

This veterinary facility shall safeguard and protect personal information under its control by implementing security measures appropriate to the sensitivity of the information.

This veterinary facility shall ensure that its employees keep all personal information confidential and comply with the security standards established by this veterinary facility.

This veterinary facility shall require third parties to whom personal information is disclosed to commit to an appropriate level of security (which may include execution of a confidentiality covenant) in protection of such information to satisfy the standards established by this veterinary facility.

On the disposal or destruction of personal information, this veterinary facility shall take the necessary precautions to prevent third parties from accessing such information and to maintain the confidentiality of such information.

8. *Transparency*

This veterinary facility will make available to any interested individual specific information about this veterinary facility's policies and procedures relating to personal information which is under the control of this veterinary facility. This veterinary facility will facilitate access to its personal information policies and procedures, and will make available information concerning the identity of its Privacy Officer, and the means by which a person can communicate with the Privacy Officer. This veterinary facility will also ensure that individuals are aware of the means of gaining access to their personal information.

9. *Individual Access to Personal Information*

An individual providing personal information to this veterinary facility will be informed about the existence of this personal information policy, and the use and disclosure of his or her personal information, and will be given access to and the right to ensure the accuracy and completeness of such information. An individual will be able to address the accuracy and completeness of his or her personal information and have it amended, if inaccurate or incomplete.

This veterinary facility will respond promptly to any request by an individual for access to his or her personal information.

This veterinary facility will maintain a complete record of third parties to whom personal information has been disclosed, and will make such record available to an individual whose personal information has been so disclosed.

10. *Questions and Concerns Regarding Compliance with this Policy*

An individual providing personal information to this veterinary facility may address any question, concern or complaint regarding this veterinary facility's compliance with this personal information policy to the Privacy Officer.

This veterinary facility will establish a procedure for processing any complaint about the personal information policy to ensure that all complaints are dealt with in an objective, fair and expeditious manner.