

## **PRIVACY POLICY**

The protection and confidentiality of your private personal information (PI) is a priority at Fundamentals Physiotherapy & Wellness Inc. Our wellness clinic is required to collect important Personal Identifiable Information (PII) due to law. Personal Identifiable Information includes any information that relates to personal characteristics (e.g., address, phone number, gender, age, income, ethnic background and family status), their health (e.g., health history and/or conditions, health services received by them) or their activities and beliefs (e.g., political views, religion, opinions expressed by an individual or opinion of an individual).

At Fundamentals Physiotherapy & Wellness Clinic Inc., we are required to collect such PII information in regards to our clientele in order to provide quality care and the services and goods per your request.

- The primary purpose may include basic intake information including and not limited to: legal name, address, date of birth, emergency contacts. Additional information required may include insurance coverage through extended health benefits (Sunlife Financial, Manulife, etc.), Workers Safety & Insurance Board (WSIB) or Motor Vehicle Collision information if we are submitting on your behalf.
- The secondary purpose may also obtain information such as your health history, family medical history, current function to ensure we are able to appropriately assess your needs, ensure your safety during treatment and your personalized plan of care.
- The third purpose is to ensure optimal services in the event of various situations. Specifically, the need to collect information in event of an emergency (injury/unconscious/medical emergency) or an instance where we believe the patient would have consented if asked (father calling on behalf of child and no reason to suggest it is not true), etc.

This document below describes Fundamentals Physiotherapy & Wellness Clinic Inc. policies that follow PIPEDA, PHIPA and the Digital Privacy Act. This is alongside our own clinical Policies and Procedures within the clinic.

Fundamentals Physiotherapy & Wellness Inc. will retain your information for a minimum of 10 years after your last interaction/visit, or, 10 years after the patients reaches the age of 18 as per government regulations.

Your personal information (PI) is secure at Fundamentals Physiotherapy & Wellness Inc. All information is digitally saved within our electronic hardware and software system secured by passwords and/or encryption. Strong passwords are used to elevate the security as generally

recommended. Electronic and digital information is submitted via (1) direct fax line, (2) secure sites (such as Workers Safety & Insurance Board (WSIB), HCAI (Health Claims for Auto Insurance (HCAI), Telus Health (Provider Services), etc.

Our clinic staff is trained to collect, use and disclose personal information required for their job requirements and duties, while following our privacy policy and Government Regulations. Any unauthorized access to personal information is strictly prohibited by Fundamentals Physiotherapy & Wellness Clinic Inc.

There may also be instances where we must provide your PII from other health care providers if you are seeking additional goods and services within the clinic. If the patient is not the insurance policy holder, we may also require the name and date of birth (DOB) of the policy holder in order to directly bill your insurance provider on your behalf.

Fundamentals Physiotherapy & Wellness Clinic Inc. is a small business comprised of and not limited to Registered Physiotherapists, Manual Osteopathic Practitioners, Registered Massage Therapists, Physiotherapy Assistants, Kinesiologists, Personal Trainers/Exercise Specialists, administrative personnel and any supportive staff. All staff abides by our Policies & Procedures Manual to ensure patients strict privacy and confidentiality of data and PII. Some clinicians are regulated by their respective Colleges. These Colleges have the right to inspect our records and assess/interview our staff as part of their job description and activities to ensure we continue to provide quality and safe care. We are mandated to report any serious offences, incompetency's or misconducts to said colleges. These colleges are listed below:

- Physiotherapists: College of Physiotherapists of Ontario;
- Massage Therapist College of Massage Therapists of Ontario;
- Kinesiologists: College of Kinesiologists of Ontario
- Manual Osteopathic Practitioners: Registered under Associations (not a governing College) Please refer to the Contacts at the end of the policy for more information

Our clinic may engage in communication with including but not limited to legal services, software technicians, adjustors, adjudicators, technology consultants, other consultants, etc., and resources that may, due to their job description, have access to your personal information. Fundamentals will restrict access to your PII and will ensure they follow the law to keep your PII confidential as per law within a written contract.

In addition, various government agencies (Canada Revenue Agency (CRA) and other relevant agencies) have the right to investigate and review our files and our staff. If these circumstances were to arise, we may consult with our professional team (lawyers, accountants, etc.) if required.

Our clinic also offers goods and services that may be applicable to electronic billing on behalf of clients, MVA and WSIB and other relevant third parties. These third-party payors often have obtained your consent to collect and disclose information for the relevant billing and claim entitlement. They may inquire to the goods and services provided at the time of service or in months/years to follow.

In addition to the above, Fundamentals Physiotherapy & Wellness Inc. collects, uses and discloses information secondary to our primary purpose in conjunction with regulations. This includes sharing information to third party companies for additional services that are including the following but not limited to:

- *Practice Perfect*: Scheduling Software System & their Cloud-based system
- *Physiotec*: for exercise programs sent via text and email
- *Wired Client*: for text message appointment reminders
- *Embodia App*: for scheduling and virtual appointments (PHIPA and PIPEDA compliant) if applicable

Upon your request, you have the right to remove yourself from our contact list at any point in time. Fundamentals Physiotherapy & Wellness Clinic Inc. will remove any reasonable personal information from our contact list upon request. We do not use, share, sell or distribute your information other than our original use that was provided you. The Privacy Act also entitles you to obtain your personal information we have on file at Fundamentals Physiotherapy & Wellness Clinic Inc. within reason and as per our College Guidelines and Government laws. We reserve the right to confirm your identity through identification, and to charge a fee for the request. Requests must be done in writing.

Our policy is made as per the PIPEDA/PHIPA and the DPA Act's as listed below. Please review below for more information or any additional questions or inquiries:

For further information on the Federal (Canada) PIPEDA (Personal Information Protection and Electronic Documents Act): Please refer to <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>

For further information on the Provincial (Ontario) PHIPA (Personal Health Information Protection Act): Please refer to [http://www.health.gov.on.ca/en/common/ministry/publications/reports/phipa/phipa\\_mn.aspx](http://www.health.gov.on.ca/en/common/ministry/publications/reports/phipa/phipa_mn.aspx)

For further information on the Federal (Canada) Digital Privacy Act (Bill S-4): Please refer to <https://www.parl.ca/legisinfo/BillDetails.aspx?billId=6524311&Language=E&Mode=1>



FUNDAMENTALS  
PHYSIOTHERAPY  
& wellness clinic

If you have any questions or concerns regarding privacy, or the above Acts, please do not hesitate to reach out to us below. If we are unable to answer your questions, we will forward you in the right direction.

For more information, contact:

Julie Kobrynovich

Owner & CEO of Fundamentals Physiotherapy & Wellness Clinic Inc.

Phone: (905) 576-5065

Email: [admin@fundamentalsphysio.ca](mailto:admin@fundamentalsphysio.ca)

### **COLLEGE CONTACT INFORMATION:**

#### Physiotherapy

*College of Physiotherapists of Ontario:* 375 University Ave (Suite 800), Toronto ON. M5G 2J5

Phone: (416) 591-3828 (Ext. 201) Toll Free: 1-800-583-5885 Fax: (416) 591-3824 Email:

[info@collegept.org](mailto:info@collegept.org)

#### Massage Therapy

*College of Massage Therapists of Ontario:* 1867 Yonge Street (Suite 810), Toronto ON.

M4S 1Y5 Phone: (416) 489-2626 Toll Free: 1-800-465-1933 Fax: (416) 489-2625 Email:

[cmto@cmto.com](mailto:cmto@cmto.com)

#### Kinesiologists

*College of Kinesiologists of Ontario:* 160 Bloor Street Est (Suite 102), Toronto ON. M4W 1B9

Phone: (416) 961-7000 Fax: 1-416-961-7009 Email: [info@coko.ca](mailto:info@coko.ca)