

Continuum Wellness PRIVACY POLICY

Continuum Wellness provides Registered Massage Therapy, Chiropractic, Naturopathic, Psychotherapy, Homeopathic and Reflexology services. Our staff comprises of Registered Massage Therapists, Naturopaths, Chiropractic Doctors, Homeopaths, Psychotherapists and Certified Reflexologists. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. 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

Continuum Wellness may collect personal information as required for services offered through electronic forms, email, phone, fax, mail or in person. Personal information includes or relates to:

- 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, health services received by 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 or services that was 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 improvement 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. Also, our organization believes that it should report information suggesting serious illegal behavior 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, etc.) 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.

- The cost of goods/services provided by the organization to clients is often paid for by third parties (e.g., motor vehicle accident insurance, private insurance, Assistive Devices Program). These third party payers often have the client's consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- Clients or other individuals we deal with may have questions about our goods or services after they have been received. We retain our client information for a minimum of ten years after the last contract to enable us to respond to those questions and provide these services (our regulatory College requires us to retain our client records).
- When you make a purchase online, such as a gift certificate, you are required to submit personal information such as your name and phone number. The information below refers primarily to online purchases.

Online Purchases

When you make a purchase through continuumwellness.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 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.

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 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 unsubscribe (opt-out) from the list.

We are staunch supporters of the Canadian Federal Privacy Legislation. Never 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.

Linking to Other Websites

Continuum Wellness sometimes provides links to other organizations' websites. Unless we expressly say otherwise, a link to another website does not mean that we are responsible for, or that we endorse the content or policy of that website. When you provide information at one of those sites, you are subject to that site's privacy policy. We encourage you to read that website's policy before submitting any information if you have concerns about how information may be collected or used.

Privacy Policy Changes

Continuum Wellness may deem it necessary or appropriate from time to time to modify this privacy policy to reflect changes in the way Continuum Wellness collects or uses information or changes in privacy-related laws, regulations, or industry standards. Accordingly, Continuum 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.

Continuum 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 secured 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. Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either 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 and agencies with access to personal information must enter into privacy agreements with us.

Retention and Destruction of Personal Information

We need to retain personal information for some time to ensure that we can answer any question the client may have about the services provided and for our own accountability to external regulatory bodies.

We keep our clients files for ten years according to The College of Massage Therapists of Ontario regulations.

We destroy paper files containing personal information by shredding. 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 this access. We reserve the right to charge a nominal fee for such requests.

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 still agree to include in our 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 Continuum Wellness's Privacy Policy or questions about our compliance with PIPEDA guidelines contact:

Sjoukje Remark, RMT/Clinic Director

301-3402 Yonge St
Toronto, ON M4N 2M9
416-913-3080 ext 300

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 wish to make a formal complaint about our Privacy Practices, you may make it in writing to our client care representative. She will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal written decision with reasons.

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 those concerns with us. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory body:

College Of Massage Therapists of Ontario
1-800-465-1933

Changes to this Privacy Policy

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