



CONSENT FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

At **Mclean Teeth Dental Hygiene Care**, we understand the importance of protecting your personal information. We are committed to collecting, using and disclosing personal information responsibly. This document describes our privacy policy.

While we have always respected our clients, privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of Ontario's Personal Health Information Protection Act (PHIPA) and Personal Information Protection and Electronic Documents Act (PIPEDA). This sets out how staff members who come in contact with your personal information are aware of the sensitive nature of the information that you have disclosed to us. In this form we have outlined what we do to ensure that:

- Only necessary information is collected about you
- Mclean Teeth Dental Hygiene Care only shares your information with your consent
- Storage, retention and destruction of your personal information complies with existing legislation and privacy protection protocols
- Our privacy protocols comply with privacy legislation, standards of regulatory body (CDHO) and the law
- Accuracy, confidentiality, and security of our clients' personal information will be of utmost importance as well as allowing our clients to request access to, and correction of, their personal information

Definitions

Personal Information – means information about an identifiable individual E.g., including name, age, home address and phone number, medical information, education, employment information]. Personal information does not include contact information (described below).

Contact Information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PHIPA.

Privacy Officer – means the individual designated responsibility for ensuring that Mclean Teeth Dental Hygiene Care complies with this policy and PHIPA.



Policy 1 – Collecting Personal Information

- 1.1 – Unless the purposes for collecting personal information are obvious and the client voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 – We will only collect client information that is necessary to fulfill the following purposes:
 - To assess your dental health needs and provide health and dental care
 - To deliver safe and efficient and continuous high quality client care
 - To advise you of treatment options
 - To enable us to contact you to distribute health-care information and to book and confirm appointments
 - To allow us to provide follow-up for treatment, care, and billing
 - To establish and maintain communication with you
 - To offer and provide dental hygiene care
 - To communicate with other treating health-care providers, including specialists, general dentists, and hygienists who are the referring providers and/or peripheral providers
 - To complete and submit dental claims for a third party adjudication, pre-approval when necessary and payment.
 - To invoice for goods and services
 - To process credit card, debit, and cheque payments
 - To collect any unpaid accounts; this may include a referral to a third party collection agency and may include that agency reporting unpaid accounts to a credit Bureau
 - To comply with legal and regulatory requirements, including the delivery of client's charts and records to the College of Dental Hygienists of Ontario in a timely fashion, when required, according to the provisions of the Regulated Health Professions Act
 - To comply with agreements /undertakings entered into voluntarily by the member with the College of Dental Hygienists of Ontario, including delivery and/or review of client's charts and records to the College in a timely fashion for regulatory and monitoring purposes
 - To permit potential purchasers, practice brokers or advisors to conduct an audit in preparation for a practice sale and to purchase such information but only as part of the purchase practice
 - To deliver your charts and records to the hygienist's insurance carrier to enable the insurance company to assess liability and quantify damages, if any
 - To prepare materials to the Health Professional Appeal and Review Board (HPARB)
 - To assist our company and hygienists to comply with all regulatory requirements
 - To comply generally with the law

We understand the importance of protecting personal information.



Policy 2 – Consent

- 2.1 – We will obtain client consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 – Consent can be provided [e.g., orally, in writing, electronically, through an authorized representative] or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client voluntarily provides personal information for that purpose.
- 2.3 – Consent may also be implied where a client is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the client, customer, member does not opt-out.
- 2.4 – Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients can withhold or withdraw their consent for Mclean Teeth Dental Hygiene Care to use their personal information in certain ways. A client's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client in making the decision.
- 2.5 – We may collect, use or disclose personal information without the client's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law



Policy 3 – Using and Disclosing Personal Information

- 3.1 – We will only use or disclose a client's personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
 - To conduct client, customer, member surveys in order to enhance the provision of our services;
 - To contact our clients directly about products and services that may be of interest;
 - To order products from our lab that are being custom made for our client;
- 3.2 – We will not use or disclose client personal information for any additional purpose unless we obtain consent to do so.
- 3.3 – We will not sell client lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 – If we use client personal information to make a decision that directly affects the client, we will retain that personal information for at least one year so that the client has a reasonable opportunity to request access to it.
- 4.2 – Subject to policy 4.1, we will retain client personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 – We will make reasonable efforts to ensure that client personal information is accurate and complete where it may be used to make a decision about the client or disclosed to another organization.
- 5.2 – Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 – If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the clients' correction request in the file.



Policy 6 – Securing Personal Information

- 6.1 – We are committed to ensuring the security of client personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 – The following security measures will be followed to ensure that client personal information is appropriately protected:
[locking filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls, secured data server exclusive to Mclean Teeth Dental Hygiene Care restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures)].
- 6.3 – We will use appropriate security measures when destroying client's personal information such as [shredding documents, deleting electronically stored information].
- 6.4 – We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Clients Access to Personal Information

- 7.1 – Clients have a right to access their personal information, subject to limited exceptions.
- 7.2 – A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. [A request to access personal information should be forwarded to the Privacy Officer]
- 7.3 – Upon request, we will also tell clients how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 – We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer

- 8.1 – The Privacy Officer is responsible for ensuring Mclean Teeth Dental Hygiene Care's compliance with this policy and the Personal Information Protection Act.



GENERAL RELEASE AND CONSENT FORM

I, the undersigned, certify that I have provided an accurate and complete personal and medical-dental history and have not knowingly omitted any information. I have had an opportunity to ask questions and receive answers to any questions regarding my medical-dental history. I authorize the dental hygienist to perform diagnostic procedures as may be required to determine necessary treatment. I understand that the information provided from or to my medical doctor or another health care provider may be necessary, and I consent to the release of this information. I understand that responsibility for payment of the dental services for myself and my dependents is mine, and I assume responsibility for fees associated with these services. The patient agrees that the relationship between himself or herself and the dental hygienist shall be governed and construed in accordance with the laws of the province of Ontario.

X

Signature



AUTHORIZATION AND RELEASE

I certify that I have read and understand the above questions to the best of my knowledge and the above questions have been accurately answered. I understand that providing incorrect or withholding information can be dangerous to my health.

I authorize the Dental Hygienist to release any information including the Dental Hygiene diagnosis and the records of any treatment or examination rendered to the named client during the period of such Dental Hygiene care to third party payers and/or health practitioners for insurance and health-related referral purposes only.

I understand that my dental insurance carrier may pay less than the actual bill for services. I agree to be responsible for payment of all services rendered on my behalf or my dependents. I authorize payment directly to Mclean Teeth Dental Hygiene Care from any group insurance benefits otherwise payable to me.

I understand my personal information is collected, used, and stored in a professional and responsible manner according to PIPEDA/PHIPA standards and Mclean Teeth Dental Hygiene Care's privacy policy. My dental hygiene services are rendered according to the standards of infection control mandated by the CDHO.

I understand that payment is due in full after treatment is rendered (unless prior arrangements have been approved). I give consent for dental hygiene treatment on my behalf (or my dependent) and understand that the specific risks, benefits, and post care instructions will be provided by the dental hygienist during the relevant course of the appointment. Additional written informed consent may be required for complicated or special procedures.

I understand that any questions I may have regarding any treatment should be brought forth to be answered and addressed by the dental hygienist.

X

Signature

