

## OSLER SYSTEMS MANAGEMENT INC.

### PRIVACY POLICY

At Osler Systems Management Inc. ("Osler") we provide our clients with a service that involves the collection, use and disclosure of some personal information about our clients. Osler recognizes the importance of our clients' right to keep personal information private and protecting that personal information is one of our highest priorities.

British Columbia's *Personal Information Protection Act* ("PIPA") sets out rules as to how British Columbia businesses may collect, use, and disclose personal information. Osler engages in commercial activities in British Columbia and is therefore subject to the provisions of PIPA. To a certain extent Osler's activities are also subject to federal legislation known as the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). Our Privacy Policy is organized according to the Canadian Standards Association Model Code.

Osler will inform our clients of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle that personal information in a matter that a reasonable person would consider appropriate in the circumstances. This Privacy Policy, in compliance with both PIPA and PIPEDA, outlines the principles and practices that we will follow in protecting personal information. Our Policy includes insuring the accuracy, confidentiality, and security of our clients' personal information and allowing our clients to request access to their personal information and to correct that personal information, if required.

For the purposes of our Privacy Policy:

**personal information** means information about an identifiable individual, such as someone's name, home address, telephone number, date of birth, family status, medical and health records, income, credit history and specifically for Osler, all data regarding any of our clients' patients. In the legislation, "personal information" does not include "contact information", which is defined next.

**contact information** means information that allows an individual to be contacted at work. It includes the name, position name or title, business telephone number, business address, business email, and business fax number for that individual. Contact information is not covered by legislation but if contact information is received by us as part of any of our clients' patient data, we will regard that information as personal information and not as contact information and that information will be safeguarded by us to the same extent as other personal information that we receive.

Osler's privacy principles:

### **1. Accountability**

Osler is responsible for all personal information under our control and shall designate one or more persons who are accountable for our compliance with this policy.

### **2. Identifying Purposes for Collection of Personal Information**

Unless the purposes for collecting personal information are obvious and our 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 the time of collection.

### **3. Consent**

We will obtain our clients' consent to collect, use or disclose personal information except in circumstances, as noted below, where we are authorized to do so without consent. The legislation deems that an individual has consented to our collection, use or disclosure of personal information about that individual if, at the time the consent is deemed to be given, the purpose would be considered obvious to a reasonable person. In such circumstances, we will collect, use, or disclose personal information without obtaining a written or verbal consent to do so.

We may collect, use or disclose personal information without our clients' knowledge or consent in some circumstances that include, but are not limited to, the following:

- if the collection use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way
- if it is reasonable to expect that the collection or use of personal information with the consent of the individual would compromise the availability or accuracy of the information and the collection or use of the information is necessary for an investigation or proceeding
- if it is reasonable to expect that the disclosure of personal information with the consent of the individual would compromise an investigation or proceeding and the disclosure of the information is necessary for an investigation or proceeding
- if the personal information is available to the public from a prescribed source
- if the collection, use or disclosure of personal information is required or authorized by law

#### **4. Limiting Collection**

We will only collect client information that is necessary to fulfill the following purposes: to verify identity; to establish and maintain responsible commercial relations with our clients and to provide an ongoing service; to verify credit worthiness; to open and manage an account; to deliver requested products and services; to understand our clients' needs and preferences. When specifically requested by a client to address a database issue, Osler must view patient data of that client for the purpose of the manipulation and correction of that client's database problem. In those circumstances, all patient data is in all respects treated as personal information in strict accordance with our privacy policies.

#### **5. Limiting Use, Disclosure and Retention**

Osler will use clients' personal information and personal information regarding each client's patients for the purposes of the work performed for our clients or as specifically identified at the time of collection of that information.

We will not use or disclose client or patient personal information for any additional purpose unless we obtain consent to do so. We will not sell client lists or personal information to any parties.

Personal information will only be retained for so long as it is needed for us to serve each client. In the case of patient data, that data is removed from our system immediately after our client's problem has been addressed. It is necessary from time to time for Osler to test the performance of our system using patient data and in those circumstances we use only "scrambled" patient data that will always guarantee patient anonymity.

#### **6. Accuracy**

When we collect, use or disclose personal information, we will make reasonable efforts to ensure that it is accurate and complete. Our 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.

#### **7. Safeguarding Personal Information**

Osler is committed to ensuring the security of our clients' personal information in order to protect that information from unauthorized access, collection, use, disclosure, copying, modification, or disposal or similar risks. Among the steps taken are:

- premises security restricting access to offices and equipment
- restricted file access to personal information
- technological safeguards, including security software and firewalls

- restricting employee access to personal information as appropriate
- the creation and implementation of a comprehensive “information sensitivity policy” within Osler and unique to Osler that addresses all aspects of the protection of personal information and that gives clients’ patient data the status of “most sensitive”.

We will use appropriate security measures when destroying clients’ personal information. Osler will continually review and update security policies and controls as technology changes to ensure ongoing personal information security.

## **8. Openness Concerning Policies**

Osler will make readily available to our clients specific information about our policies and practices relating to our management of personal information.

## **9. Access to Personal Information**

Osler’s clients have a right to access their personal information subject to limited exceptions. Individuals may write to Osler’s Privacy Officer at the address below to request access to personal information held about them. Upon request, Osler will also inform clients how Osler uses the personal information and to whom it has been disclosed, if applicable. Osler will make the requested information available within a reasonable time period and Osler reserves the right to charge a minimal fee for providing access to personal information.

## **10. Challenging Compliance**

If a request for access or request to correct information is denied, Osler will provide an explanation of the reasons for that refusal and the recourse available to the client. Likewise, if any client feels at any time that we are not complying with the principles set out in this policy, that person may contact our Privacy Officer. The Privacy Officer is responsible for ensuring Osler’s compliance with this Policy and the applicable PIPA and PIPEDA. Clients should direct any complaints, concerns, or questions regarding Osler’s compliance in writing to the Privacy Officer as follows:

Attention: Privacy Officer  
Osler Systems Management Inc.  
9544 Aurora Place  
Sidney, BC V8L 5V5

If our Privacy Officer has reviewed and responded to any concern and that concern remains unresolved, that person may also communicate with the Officer of the Information and Privacy Commissioner of BC or, if applicable, to the Privacy Commissioner of Canada.