

Metro Animal Emergency Clinic

Privacy Policy

1 Summary

This privacy policy establishes the privacy principles that govern the internal operations of the Metro Animal Emergency Clinic (MAEC).

This policy will be reviewed and updated on an annual basis or more frequently as determined by the Clinic Manager. Suggestions for amendments and inquiries for interpretation or additional information should be directed to the Clinic Manager.

This policy will be made available on the MAEC website.

2 Objective

The objectives of this policy are:

- To engender the trust of the individuals who use the services provided by MAEC.
- To respect the privacy rights of individuals as expressed in legislation and fair information practices.
- To communicate MAEC's privacy policies to all stakeholders.
- To define the guiding principles for the MAEC Privacy Program.

3 Rationale

This policy is established to guide the safeguarding of the privacy of personal information that is collected, used and disclosed by MAEC, by taking all reasonable steps necessary to ensure the privacy and security of that information.

4 Scope and Application

This policy is directed to the internal operations of MAEC and applies to:

- Staff and locums.
- All assets including information, technology, and facilities.

5 Principles

5.1 Privacy Policy Authorities

This policy is developed in accordance with the following authorities listed in order of precedence:

- Personal Information Protection and Electronic Documents Act (PIPEDA)

- Canadian Standards Association's Model Code for the Protection of Personal Information (CSA Privacy Code)

5.2 Privacy Policy Framework

The Privacy Policy Framework includes all this Privacy Policy and MAEC operational privacy policies and procedures.

5.2.1 Privacy Policy

This policy establishes the high-level privacy policy requirements for the internal operations of MAEC. Development and maintenance of this policy is the responsibility of the Clinic Manager, with assistance and review from all MAEC staff.

5.2.2 Operational Privacy Policies and Procedures

Operational privacy policies and procedures may be developed by MAEC to provide day-to-day guidance to MAEC personnel in the conduct of their responsibilities. Such policies are the responsibility of the Clinic Manager.

6 Policy

6.1 Accountability

6.1.1 General Statement

MAEC is accountable for the privacy of the personal information it holds, and for the associated business processes and procedures for the collection, use, disclosure, retention and disposal of that information.

6.1.2 Staff Accountability

- The Clinic Manager is accountable for implementing measures to protect the privacy of personal information and to safeguard sensitive information assets and information systems under the control of MAEC. The Clinic Manager will provide to all staff and locums training about MAEC policies and procedures for ensuring the privacy and security of personal information.
- All MAEC staff and locums are responsible for reading this policy and complying with it and all policies and procedures relating to privacy protection.

6.1.3 Oversight

As an organization subject to PIPEDA, MAEC is subject to oversight by the Federal Privacy Commissioner.

6.1.4 Privacy Review

- MAEC will complete a Privacy Review of its clinic practices in order to ensure that personal information is managed in a manner that complies with PIPEDA.
- The Privacy Review will be revisited on an annual basis in order to ensure ongoing compliance with PIPEDA.

6.1.5 Privacy Breaches and Violations

- MAEC staff and locums must report to the clinic manager as soon as possible an awareness of any of the following:
 - Complaints regarding breaches of privacy or MAEC's information handling practices.
 - Incidents regarding unauthorized collection, use or disclosure of personal information.
 - Compromises to the confidentiality and security of information systems containing personal information.
- The Clinic Manager is responsible for investigating any breach of confidentiality or privacy.
- The Clinic Manager must prepare a report on every occurrence involving a breach of personal privacy, including what actions were taken to rectify the situation and what actions, if taken, would have served to prevent the occurrence, within seven days of the occurrence.

6.1.6 Employment and Contracting

- The Clinic Manager is responsible for ensuring that privacy requirements and obligations for positions are included in the terms and conditions of employment for staff members and locums.
- The Clinic Manager is responsible for ensuring that contracts

that apply to the services offered by a vendor are in accordance with this policy.

6.2 Identifying Purposes

6.2.1 Personal information of MAEC Staff and Locums will be used only for personnel management, contract management, business continuity, and/or security management purposes.

6.2.2 Personal information of individuals not subject to section 6.2.1, will be collected, used, disclosed, retained and destroyed only for the purposes for which it was originally collected.

6.2.3 MAEC will take the following steps with respect to documenting the purposes for which personal information is used:

- MAEC will document the purposes for which it collects personal information at or before the time the information is collected.
- Information collected will be limited to that required to satisfy the identified purposes.
- The identified purposes will be specified at or before the time of collection to the individual from whom the information is collected.
- Where personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified and documented prior to use. The consent of the individual will be required before the information can be used for the new purpose, unless required by law.
- Persons collecting personal information on behalf of MAEC will be able to explain to individuals, the purposes for which the information is being collected or be able to direct the individual to someone who can explain the purpose.

6.3 Consent

6.3.1 MAEC acknowledges that the knowledge and consent of the individual are required for the collection, use, and disclosure of personal information, except where inappropriate.

6.3.2 MAEC may use or disclose personal information without the

knowledge and consent of the individual in the specific circumstances defined in section 6.5.1.

6.3.4 MAEC acknowledges the right of an individual to withdraw consent at any time subject to contractual or legal restrictions and reasonable notice. MAEC will inform the individual of the implications of such withdrawal.

6.4 Limiting Collection

6.4.1 MAEC will limit the collection of personal information to that which is necessary for the purposes identified by MAEC.

6.4.2 MAEC will collect information by fair and lawful means.

6.5 Limiting Use, Disclosure and Retention

6.5.1 Personal information will not be used or disclosed for purposes other than those for which it was collected, unless:

- The use or disclosure is permitted by section 7(2) or (3) of PIPEDA.
- The use or disclosure is for a consistent purpose within the meaning of section 7(4) of PIPEDA.

6.5.2 Personal information will be retained only as long as necessary for the fulfilment of those purposes, or as required by law.

6.5.3 MAEC will develop guidelines and implement procedures with respect to the retention of personal information. These guidelines will include minimum and maximum retention periods. Personal information that has been used to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made.

6.5.4 Personal information that is no longer required to fulfil the identified purposes will be destroyed, erased, or made anonymous. The Clinic Manager will develop guidelines and implement procedures to govern the destruction of personal information.

6.6 Accuracy

Personal information will be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

6.7 Safeguards

MAEC will implement appropriate security safeguards to protect personal information.

6.8 Openness

6.8.1 MAEC will make readily available to individuals a written statement about its policies and practices relating to the management of personal information.

6.8.2 Individuals will be able to acquire information about MAEC's policies and practices without unreasonable effort. This information will be made available in a form that is generally understandable.

6.8.3 The information made available will include:

- Contact information for the Clinic Manager, who is accountable for MAEC's policies and practices, and to whom complaints or inquiries that relate to these policies and practices can be forwarded;
- The procedures for gaining access to personal information held by MAEC;
- A description of the type of personal information held by MAEC, including a general account of its use;
- A copy of any brochures or other information that explains MAEC's policies, standards, or codes;
- What personal information is made available to related organizations; and
- How to register a complaint.

6.9 Individual Access

- The Clinic Manager will establish procedures to enable individuals to access their personal information held by MAEC.
- Upon request, an individual will be informed of the existence, use, and disclosure of his/her personal information and will be given access to that information.
- Requests for access to personal information must be made in

writing to the Clinic Manager.

- Within 30 days following a request for access from an individual, MAEC will provide the requested information or provide an explanation for a denial of access.
- The requested information will be provided or made available in a form that is generally comprehensible.
- An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate. Where there is a dispute about the accuracy of the information, the individual will be able to append a notice of disagreement to the file according to section 47(2) of FIPPA.
- Where there has been an amendment to an individual's personal information, the amended information will be transmitted to third parties having access to the information in question.

6.10 Challenging Compliance

- An individual may address a challenge or complaint concerning compliance with this policy in writing to the Clinic Manager
- MAEC will investigate all complaints. If a complaint is found to be justified, MAEC will take the appropriate measures including, if necessary, amending its policies and practices.
- An individual who is unsatisfied with the outcome of a complaint or challenge determined by the Clinic Manager may make an appeal to the Federal Privacy Commissioner.
- Where MAEC denies access to personal information, MAEC will inform the requester of the reason for the denial and will inform the requester of the right to appeal to the Federal Privacy Commissioner for a review of the decision.