

## Privacy Policy

### Your Privacy

The following policy outlines the *VITAL STEPS/MEDFIT REHAB* Privacy practices concerning the collection, use, disclosure and protection of personal information to mirror the standards that are set out in the Personal Information Protection and Electronic Documents Act. This Act is federal legislation governing the collection, use and storage of personal information and is referred throughout this document as the ACT.

The ACT recognizes an individual's right to privacy while respecting the needs of organizations and enterprises to collect, use, and disclose information about individuals. The objective of the ACT is to ensure fair, open and equitable treatment of the information entrusted to *VITAL STEPS/MEDFIT REHAB*.

### What is personal information?

The ACT defines "personal information" as information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

### What information is *VITAL STEPS/MEDFIT REHAB* responsible for protecting?

*VITAL STEPS/MEDFIT REHAB* makes its best efforts to protect a client's personal information in its possession including personal information that has been received from a third party or personal information that may not be in the custody of *VITAL STEPS/MEDFIT REHAB* but which has been transferred to a third party.

### Collection of Information

We will disclose your personal information when you have given written consent. Under no circumstances do we sell participant or personal information to others. Please note that we will not share health information that may have been provided in connection with a program, program withdrawal or request for refund. With your consent, we may use certain information to provide you with information about *VITAL STEPS/MEDFIT REHAB* and its affiliates and programming. Information collected by *VITAL STEPS/MEDFIT REHAB* about its users is used internally by authorized employees of *VITAL STEPS/MEDFIT REHAB* for the following reasons:

- Maintain a complete record of participants or clients
- Maintain communication with clients and respond to their enquiries
- Investigate and settle grievances and claims
- Provide web information services (e.g. address changes, e-mail bulletins and registration).
- To process payment
- Register you in the program of your choice
- Update you when required of any possible changes of the planned services at *VITAL STEPS/MEDFIT REHAB*, determination of those areas, features, and services that are valued the most and found most helpful.
- To determine the appropriate participation in the activities and services provided at the *VITAL STEPS/MEDFIT REHAB* and on our site, like names, postal addresses, email addresses, etc., when voluntarily submitted by our visitors.

Personal information may be collected, used or disclosed for any of these identified purposes as set out above. If a client's personal information is needed for any purpose other than those set out above, *VITAL STEPS/MEDFIT REHAB* will not use or disclose it without obtaining additional consent from the client(s).

If *VITAL STEPS/MEDFIT REHAB* uses an individual's personal information to make a decision that directly affects the individual, *VITAL STEPS/MEDFIT REHAB* shall retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to the information.

### How does *VITAL STEPS/MEDFIT REHAB* gather personal information?

The collection, use and disclosure of personal information depends on gathering information from the following sources:

- Applications or Health Surveys
- Grievance, appeal or claim forms
- Other healthcare providers, with respect to respective patients
- A client's interaction(s) - for example, e-mail, correspondence and telephone
- Third party providers or referral sources

### Protection of personal information

In order to protect a client's personal information in the Company's possession or control, *VITAL STEPS/MEDFIT REHAB* has made reasonable security arrangements to protect personal information such as:

- Access to personal information is limited to selected employees and officers who require access to the information in the performance of their job function and/or duties
- Security safeguards are in place to prevent unauthorized access on computer systems
- *VITAL STEPS/MEDFIT REHAB* will not collect or disclose personal information for purposes other than what has been listed in this Privacy Policy
- *VITAL STEPS/MEDFIT* will endeavour to ensure that personal information is accurate and current.
- Client lists will not include his/her social insurance or employee number(s).
- Client and reference lists/reports produced for the purpose of conducting the Company's business, will be distributed with advice on the appropriate use of such information in order to comply with this Privacy Policy. (Examples of such lists/reports would include steward and officer lists, grievance reports, worksite reports.)

Elected officers found to be abusing client information, can be subject to the disciplinary procedures.

### **Distribution of Information**

We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when: (1) permitted or required by law; or, (2) trying to protect against or prevent actual or potential fraud or unauthorized transactions; or, (3) investigating fraud which has already taken place. The information is not provided to these companies for marketing purposes.

### **Others Involved in Your Healthcare**

Unless you object, we may disclose to a primary care physician, designated medical professional(s), member of your family, a relative, a close friend or any other person you identify, your protected health information that directly relates to that person's involvement in your health care. If you are unable to object to such a disclosure, we may disclose such information as necessary if we determine that it is in your best interest based on our professional judgment. We may use or disclose protected health information to notify or assist in notifying a family member, personal representative or any other person that is responsible for your care of your location, general condition or death. Finally, we may use or disclose your protected health information to an authorized public or private entity to assist in disaster relief efforts and to coordinate uses and disclosures to family or other individuals involved in your health care.

### **How do clients access their personal information?**

Requests should be in writing addressed to: *VITAL STEPS/MEDFIT REHAB* Privacy Officer  
Address: 1701A Avenue Road, Toronto, Ontario, M5M 3Y3  
E-mail: tina.vourinaris@vitalsteps.com

State as specifically as possible what personal information you are requesting. Response to such requests will be within thirty (30) days or as soon as possible. If, for some reason, *VITAL STEPS/MEDFIT REHAB* is unable to respond within this timeline, you will be advised.

In the case where *VITAL STEPS/MEDFIT REHAB* holds personal information as a result of a transfer for processing, the individual will be referred to the collecting organization for access. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate by the collecting organization.

There may be some types of information *VITAL STEPS/MEDFIT REHAB* is prohibited from providing, such as information about another individual that cannot be separated from your information or information which cannot be disclosed for legal reasons.

### **Keeping a client's information accurate is a priority**

*VITAL STEPS/MEDFIT REHAB* strives to ensure that the personal information we have on file is accurate and up-to-date as necessary for the identified purposes for which it is to be used. In order to achieve this, you must assist us.

### **Filing a complaint**

Any complaint relating to this Privacy Policy or any of the procedures should be forwarded to the attention of the *VITAL STEPS/MEDFIT REHAB* Privacy Officer. If the complaint is justified, *VITAL STEPS/MEDFIT REHAB* will take the steps necessary to resolve the issue, including amending the Privacy Policy and practices, if necessary.

If *VITAL STEPS/MEDFIT REHAB* is not able to resolve a complaint, or if a client has any other concerns about *VITAL STEPS/MEDFIT REHAB* Privacy Policy and procedures, the client may contact the Office of the Provincial Privacy Commissioner. The *VITAL STEPS/MEDFIT REHAB* Privacy Officer will provide this contact information upon request.

### **Securing Your Information (Online)**

The *VITAL STEPS/MEDFIT REHAB* website uses sophisticated security and safeguard measures to protect user's information. One such measure is our use of secure server software (SSL), to ensure that your credit card will be protected against fraudulent use while on our site.

By using the site, you are accepting the practices described in this Privacy Policy. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis. You are encouraged to review the Privacy Policy whenever you visit the site to make sure that you understand how any personal information you provide will be used.

*VITAL STEPS/MEDFIT REHAB* respects your privacy and pledges to maintain the confidentiality of your personal information. All personal information you share with us is maintained in accordance with the Personal Information Protection and Electronic Documents Act (2000). References to *VITAL STEPS/MEDFIT REHAB* may include its affiliates, depending on the context.

**Note:** The privacy practices set forth in this Privacy Policy are for web sites within the *VITAL STEPS/MEDFIT REHAB* portfolio. If you link to other third party web sites, please review the privacy policies posted at those sites. *VITAL STEPS/MEDFIT REHAB* is not responsible for how data or information is treated/handled by any third party web site that is linked to or from our sites.

### **Cookie/Tracking Technology**

The Site may use cookie and tracking technology depending on the features offered. Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the number of visitors to the Site(s), and understanding how visitors use the Site(s). Cookies can also help customize the Site(s) for visitors. Personal information cannot be collected via cookies and other tracking technology; however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.