



Own Health, inc.

Notice of Privacy Practices

Chief Privacy Officer: MSaleh@ownhealth.ca. Please contact with questions or concerns.

Introduction

Welcome to Own Health. Your trust is fundamental to our commitment to providing exceptional healthcare services. This Privacy Policy is a testament to our dedication to safeguarding your personal and health-related information. In this document, we outline our practices and principles regarding the collection, use, and protection of your information, ensuring adherence to the highest standards of confidentiality and compliance with Ontario's privacy laws.

We are required by law to maintain the privacy of protected health information, to provide individuals with notice of our legal duties and privacy practices with respect to protected health information, and to notify affected individuals following a breach of unsecured protected health information. This notice describes how Own Health, Inc. ("Own Health," "we," or "us"). It also describes your rights and our legal obligations with respect to your medical information. If you have any questions about this Notice, please contact our Privacy Officer listed above.

Compliance with Privacy Laws

Own Health strictly adheres to the Personal Health Information Protection Act (PHIPA) and the Personal Information Protection and Electronic Documents Act (PIPEDA), along with other applicable privacy legislation in Ontario. We continually update our practices to stay abreast of changes in these laws, ensuring that we maintain the highest level of legal compliance and ethical standards in managing your personal information.

Collection of Personal Information

At Own Health, we collect various types of personal information that are essential to providing you with quality healthcare services. This includes, but is not limited to:

- **Identifying Information:** Name, date of birth, and contact details. Contact Information (address, phone numbers, email)
- **Health Information:** Medical history, current health status, laboratory test results, and diagnoses. Medical History and Current Health Information
- **Billing Information:** financial information for payment processing and billing.



- **Other Relevant Data:** Information from other healthcare providers, family health history as relevant, and any other information necessary to provide you with our services.

Information is collected through direct interactions, our Electronic Medical Record (EMR) system, and from other healthcare providers, always with appropriate consent.

Identified Purposes for Collection, Use, and Disclosure

- **For Healthcare Provision and Treatment:** To deliver effective healthcare services tailored to your needs. We can use your health information and share it with other professionals who are treating you. This includes communicating your health information and about your health information through SMS, phone, telehealth (e.g. Zoom), and email.
- **For Billing and Payment:** We may use and disclose your health information to obtain payment for the services we provide and to manage financial transactions and payments.
- **For Healthcare Operations:** For essential administrative tasks and compliance with legal and regulatory obligations. We may use and disclose your health information to operate our organization. For example, we may use and disclose this information to review and improve the quality of services, or the competence and qualifications of our professional staff. Or we may use and disclose this information to authorize services or referrals.

We may also share your health information with our “business associates,” such as our billing service, that perform administrative services for us. We have a written contract with each of these business associates that contains terms requiring them and their subcontractors to protect the confidentiality and security of your medical information.

- **For Research:** Participation in research is subject to your explicit consent and contributes to the advancement of healthcare.
- **For Legal Requirements:** Complying with legal mandates such as reporting certain health conditions.

Consent

Consent is a cornerstone of our interactions with you. We obtain explicit consent for the use and disclosure of your information, except where permitted or required by law. You have the right to withdraw or restrict your consent at any time, subject to legal and contractual obligations.

Use of Personal Information

Your information is used strictly for the purposes for which it was collected. Only authorized personnel have access to this information, and we employ strict confidentiality agreements and security measures to prevent unauthorized access or disclosure.

Own Health may also employ third-party service providers to host data or provide services on your behalf, and that third parties may have limited access to Personal Information to provide their services.



Own Health uses contractual means to require these Service Providers to maintain the confidentiality and security of the information.

Own Health will never rent or sell the personal information or personal health information it collects.

Disclosure of Personal Information

Disclosure is limited to the purposes outlined and includes sharing information with other healthcare providers as part of your care team, with financial institutions for billing, or as legally required.

Retention of Personal Information

We retain personal information for as long as necessary to fulfill the identified purposes or as required by law. Our retention policies comply with Ontario's legal requirements, and once information is no longer needed, it is securely destroyed or anonymized.

Accuracy and Security of Personal Information

We take all reasonable steps to ensure that your information is accurate, complete, and up-to-date. Our security measures include physical, organizational, and technological safeguards, such as secure storage, restricted access, and the use of encryption for electronic records.

Patient Rights

You have the right to access your personal information and request corrections if necessary. We provide a transparent process for you to exercise these rights and address any concerns promptly. Requests for access or correction can be directed to our privacy officer.

Request for Removal of Personal Information

At Own Health, we understand and respect your right to have your personal information removed from our systems, subject to legal, regulatory, or ethical obligations that may require us to retain certain information.

Process for Requesting Removal: Patients wishing to have their information removed should submit a formal request to our Privacy Officer. This can be done via email, phone, or postal mail.

Evaluation of Request: Each request will be evaluated on a case-by-case basis. We will assess our ability to comply with the request considering factors such as legal retention requirements (e.g., for medical records) and the impact on continuity of care.

Response to Request: We will respond to your request promptly, informing you of our decision and any actions taken or reasons if we are unable to comply fully with your request.

Limitations: It's important to note that in some instances, we may be unable to completely remove all your information due to legal, regulatory, or ethical obligations. For example, we are often required to retain medical records for a certain period under healthcare laws.



Impact of Removal: We will inform you of any potential consequences of removing your information, such as the effect on future medical care or claims.

Security of Process: The process of removal will be carried out with the same level of security and confidentiality as all our data handling practices, ensuring your information is appropriately and securely managed throughout.

Contact Information

For inquiries or concerns regarding our Privacy Policy or your personal information, please contact:

- Email: MSaleh@OwnHealth.ca

Policy Updates This Privacy Policy is subject to periodic review and updates. Any changes will be communicated through our website and directly to our patients.

Effective February 5th, 2024 (Last Updated February 5th, 2024)