



Your Privacy Is Important to us

Natural Health Services Ltd. and its subsidiaries (collectively, “NHS”) is committed to maintaining the privacy and confidentiality of all personal information that we collect, use and disclose. NHS strives to protect the privacy rights of our patients by meeting or exceeding the standards established by law. This Privacy Policy outlines why we collect patients’ health information, how we manage patients’ information and how we safeguard their information. Every employee, service provider, student, volunteer, and authorized affiliate of NHS must adhere to a policy of confidentiality with respect to personal information that they may obtain through the course of their involvement with NHS, which includes adherence to the terms of this Privacy Policy. This policy will be reviewed when the individual first becomes involved with NHS and continues in effect indefinitely.

As part of establishing this Privacy Policy, NHS has appointed a Privacy Officer for all privacy matters. Our Privacy Officer can be reached at kallen@naturalhealthservices.ca or 1-844-262-0942 and is available to answer your questions and address your concerns regarding privacy.

Health Information

“Health Information” includes information about an individual in oral or recorded form. It includes any information about an individual’s health or health care history that could identify an individual when used alone or with other information. This may include diagnostic, treatment and care Information such as:

- a person’s physical or mental health;
- the treatment they are receiving or have received including information about health services providers involved in their care;
- drugs they have been provided with;
- health care aids or products they have received; and
- the amount of health care benefits paid or payable for services provided to them.

It may also include registration information such as:



- demographic information of an individual (name, signature, gender, photograph, personal health care number, etc.);
- location, residency and telecommunications information (mailing and electronic addresses, past residences, citizenship/immigration status);
- health service eligibility information; and
- billing information.

What Information Do We Collect from You?

The types of personal information NHS collects, uses and stores may vary depending upon the individual involved and the nature of their relationship with NHS. The information we collect may include, for example

- a patient's name, address, date of birth, health card information, health history, family health history; and
- information related to assessment, diagnosis, medication, counseling and treatment.

With limited exceptions, we obtain most information directly from our patients and collect only as much information as is necessary to meet the purpose of the collection.

Occasionally, we may collect information about you from other sources, including other health care providers, where we have obtained your consent to do so or if the law permits.

We will not collect your information if other information we have will serve the purpose of the collection. In addition, we will not collect more information than is reasonably necessary to meet the purpose.

How We Use the Information We Collect

NHS will identify the purposes for which information is being collected, in advance, and will inform patients of these purposes. We will only collect, use and store information that is necessary for these purposes.

Patient's personal information may be used, for example:

- to provide assessment, treatment and other health care services;
- to obtain payment for health care services, including payment from a Health Insurance Plan;



- for quality assurance purposes;
- to comply with legal and regulatory requirements; and
- to fulfil other purposes permitted or required by law to plan, administer and manage our internal operations.

If we intend to use your information for any other purposes, we will ask for your consent before doing so, unless required to do so by law.

When Do We Need Consent?

NHS will not collect, use or disclose health information without a patient's consent, or his or her substitute decision maker's consent, or as required by law. Consent to the collection, use or disclosure of health information may be express or implied.

"Express Consent" means permission that we have specifically obtained from you.

"Implied Consent" means that we have concluded from surrounding circumstances that you would agree to the collection, use or disclosure of your information, and we need not ask you for your express consent.

For most health care purposes, consent is implied as a result of consent to treatment.

However, in some circumstances, express and sometimes written, consent may be required. Unless the law requires such disclosure, we will always ask for your express consent before:

- disclosing your information to someone who is not a health information custodian (e.g. to an insurance company, employer, lawyer, etc.); or
- disclosing your information to a health information custodian for purposes other than providing you with health care (e.g. a doctor working for an insurance company).

You may withdraw or limit your consent at any time, unless doing so prevents us from recording the information we require from you by law or under professional standards. You can give an express (written) instruction, however, that specific information is only to be used or disclosed by certain individuals or for certain purposes. Our Clinic Manager or any of our health professionals who are dealing with you will assist you with this process.

We may collect, use or disclose your information without your consent in certain limited circumstances that are expressly permitted by the law.

If you are found to be incapable of making decisions about your information, we will consult your substitute decision-maker, as determined by law.

Sharing Health Information

Unless instructed otherwise, we may disclose a patient's personal health information without consent to other health care providers in the "Circle of Care", who need to know this information to help provide the patient with care. The "Circle of Care" includes other health care professionals, pharmacies, laboratories, ambulance services, nursing homes, Community Care Access Centres and home service providers who provide you with health care services.

The only exception to this is that we may be required or permitted by law in certain instances to disclose personal health information without consent, such as to the Alberta Health Care Insurance Plan for payment purposes.

Safeguards & Security

NHS recognizes the importance of safeguarding health information and will take all steps that are reasonable in the circumstances to ensure that health information in our custody is protected against theft, loss or unauthorized access, use, or disclosure. We will also ensure that the records containing this information are protected against unauthorized copying, modification or disposal.

In order to protect your information, we have taken steps to meet the need for physical security, technological security and administrative controls.

The measures we have taken for the physical security of personal health information include:

- restricting office access to authorized individuals; and
- maintaining all records in our office which has a secure access.

The personal health information records we maintain are kept in electronic format. Such records are protected through technological security measures we have taken including the use of:

- password controls and search controls;
- firewalls and anti-virus software;



- logging, auditing and monitoring of all access to electronic records of personal health information;
- privacy notices; and
- encryption of all electronic communication and of all information transmitted electronically.

We have also implemented administrative controls to safeguard the personal health information records we maintain, including:

- providing mandatory initial and ongoing privacy training to all employees;
- conducting regular audits of our practices to ensure compliance with our policies; and
- requiring service providers and employees to sign confidentiality agreements with NHS when the individual first becomes with NHS

Retention of Health Information

Our policy is to retain personal health records in accordance with any minimum retention period that is established by law.

Disposal of Health Information

When personal health information is disposed of, NHS will take reasonable steps to ensure secure destruction. Where a third party is retained to dispose of personal health information, we will enter into a written agreement with the third party that sets out the requirements for secure disposal and require the third party to confirm in writing that secure disposal has occurred.

Privacy Breaches

In the event that a patient's health information has been stolen, lost or subject to unauthorized use, access, disclosure, copying or modification, our first priority will be to identify and contain the breach, and then to take steps to correct it. We will notify any



patient whose health information may have been disclosed, lost or shared in an unauthorized manner, at the first reasonable opportunity. We will also work with the Privacy Commissioner's office who will assist NHS in mitigating the risks associated with a breach.

Access to Health Information

Patients have a general right to access all personal health information about them in NHS's custody or control. Patients may also request a copy of this information.

If a patient would like to request access to or a copy of his or her personal health information, he or she must make a written request to the Privacy Officer at kallen@naturalhealthservices.ca or

Privacy Officer
Suite 400, 355 4th Ave. SW
Calgary, AB
T2P 0J1

A patient's right to access his or her personal information is not absolute. We may deny an access request where:

- the information does not exist or cannot be found;
- denial of access is required or authorized by law; or
- the request is frivolous, vexatious, or made in bad faith.

All requests for access to health information will be responded to within 30 days. If you are refused access to your records, there will be a reason provided to you as to why we are not able to do so. You will also be notified of your right to contact the applicable privacy commissioner or ombudsman in your province.

We may charge a reasonable fee for making information available and/or providing copies of information. If we choose to do so, we will provide notice of the fee in advance of processing the request.

Accuracy of Health Information

We take all reasonable steps to ensure all personal health information is as accurate, complete and up-to-date for the purpose the information is being used.

We will not routinely conduct updates on information in our control unless routine updates are necessary to fulfil the purposes for which the information was collected.

We will take reasonable steps, however, to ensure that any information that is used on an ongoing basis, including any information that is routinely disclosed to others under this Policy, is accurate, complete and up-to-date. Where we know that information is not accurate, complete or up-to-date, this fact will be indicated at the time of use or disclosure.

We use specific technology to the health care industry and well-defined practices to ensure personal health information is processed promptly, accurately, and completely. We ask that our patients advise us of any changes to personal health information so that we may ensure our information is accurate.

Correction to Personal Health Information

If a patient believes that his or her health information is not accurate or complete, he or she may make a written request to the Privacy Officer to have the information corrected.

NHS will correct health information where it is demonstrated that the information in the patient's record is, in fact, inaccurate or incomplete and necessary information is provided to correct the record.

However, we may refuse to correct health information where:

- we are not satisfied that the record is incomplete or inaccurate for the purposes for which we collected, use or have used the information;
- the record containing the health information was not originally created by us and we do not have sufficient knowledge, expertise and authority to correct the record;
- the request consists of a professional opinion or observation that a health care provider has made in good faith; or
- the request is frivolous, vexatious, or made in bad faith.



All requests for correction of health information will be responded to within 30 days. Where a correction request is denied, patients will be notified of the reasons for the refusal and will be informed that they are entitled to prepare a short statement of disagreement to have appended their record. In addition, patients are entitled to make a complaint about the refusal to the applicable privacy commissioner or ombudsman in your province.

Compliance with This Policy

All affiliates of NHS will only use and discuss patient's personal health information for the purposes outlined above. All of our service providers are required to know and comply with this Privacy Policy. Annual confirmation of compliance is required.

Any breach of this Policy by our employees may result in disciplinary action, including:

- suspension, demotion, and termination;
- termination of contractual relationship; or
- termination of affiliation.

All agents must notify the Privacy Officer at the first reasonable opportunity if a patient's personal health information is lost, stolen or accessed without authorization.

Questions/Concerns

If you have any questions or concerns about privacy at the NHS, please speak with our Privacy Officer:

Kristi Allen

kallen@naturalhealthservices.ca

NHS takes the privacy of its patients seriously and will investigate all written privacy concerns. If a concern is found to have merit, we will take appropriate measures, including, if necessary, taking disciplinary action against our agents and/or amending our policies and practices relating to the collection, use and disclosure of your information.



Changes to This Policy

At NHS, we review our privacy policies and procedures on an ongoing basis and may revise these from time to time. If these revisions significantly change how we collect, use or disclose previously collected health information, we will inform our patients and obtain consents where required. Any changes to our Privacy Policy shall be acknowledged in this Privacy Policy in a timely manner. This Privacy Policy was last modified on December 12, 2017.