# **Privacy Responsibilities Policy**

| Title: Privacy Responsibilities Policy                |                  |
|-------------------------------------------------------|------------------|
|                                                       | Pages: 1 of 2    |
| Created by: J. Durocher                               |                  |
| Initial Issue Date: January 16, 2016                  |                  |
| Date of Revision: December 2018, April 2020, May 2022 |                  |
| Reviewed by: Director of Operations ARGI/Best Care    | Review: Annually |
| Approvals: Director of Operations ARGI/Best Care      |                  |

Organizations covered by the Act must obtain individual's consent when they collect, use or disclose the individual's personal information. The individual has the right to access, personal information held by an organization and to challenge its accuracy, if need be. Personal information can only be used for purposes for which it was collected. If an organization is going to use it for another purpose, consent must be obtained again. Individuals should also be assured that their information will be protected by specific safeguards, including measures such as locked cabinets, computer passwords or encryption.

#### Personal Information:

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- Age, name, ID numbers, income, ethnic origin
- Opinions, evaluations, comments, social status, or disciplinary actions
- Consultant files, medical records, existence of a dispute between a consumer and a merchant
- ➤ If there are any questions or concerns regarding your patient records, please see your Family Physician directly to review those records for any corrections or omissions.

Personal information does not include the name, title or business address or telephone number of a consultant of an organization.

# 10 Privacy Principles that must be followed are:

# Principle 1 – Accountability

ARGI is responsible for personal information under its control and designates the Chief Executive Officer and/or Director of Operations accountable for the organization's compliance with the following principles.

#### Principle 2 – Identifying Purposes

The purposes for which personal information is collected shall be identified by ARGI.

#### Principle 3 – Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

### Principle 4 – Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by ARGI. Information shall be collected by fair and lawful means.

#### Principle 5 – Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

## Principle 6 – Accuracy

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

## Principle 7 – Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

# Principle 8 – Openness

ARGI will make readily available to individuals specific information about its policies and practices relating to the management of personal information.

## Principle 9 – Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

#### Principle 10 – Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the Chief Executive Officer and/or Director of Operations accountable for the organization's compliance. These principles are usually referred to as "fair information principles". They are included in the Personal Information Protection and Electronic Documents Act (PIPEDA), Canada's private-sector privacy law.

Privacy Questions for ARGI? Please email bestcare@argi.on.ca a response can be expected within 72 hours.