



Privacy Policy

Privacy of personal information is an important principle to Stéphanie Lévesque, Dt.P.-Nutritionniste/RD. She commits to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services provided. Stéphanie Lévesque, Dt.P.-Nutritionniste/RD tries to be open and transparent about how we handle personal information. This document describes the privacy policy.

What is Personal Health Information?

Personal health information is information about an identifiable individual. Personal health information includes information that relates to:

- ✓ The physical, nutritional or mental health of the individual (including family health history);
- ✓ The provision of health care to the individual (including identifying the individual's health care provider(s));
- ✓ A plan of service;
- ✓ Payments or coverage for health care;
- ✓ The donation or testing of an individual's body part or bodily substance;
- ✓ The identification of the individual's substitute decision-maker.

Who am I?

At the time of writing Stéphanie Lévesque, Dt.P.-Nutritionniste/RD is the only owner. However, Stéphanie Lévesque, Dt.P.-Nutritionniste/RD signed a subcontracting agreement in which each individual has accepted to diligently respect this policy of confidentiality.

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD is responsible for developing, maintaining and implementing the policies and procedures to protect personal health information and ensure the security of the records.

Why do I Collect Personal Health Information?

Primary Purpose:

The purpose of collecting, using and disclosing personal health information (personal characteristics, health information, activities and points of views) is to assess the needs of every client and launch a dietetic intervention that is safe and of high quality. The information is

collected, used and disclosed to provide ongoing health services, identify changes that are occurring over time and adapt the nutritional interventions.

Related Purpose:

Some personal characteristic collected such as full address and email address are required to obtain payment for the services provided. The information can also be used to provide follow up services.

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD is regulated by l'Ordre des Diététistes-Nutritionnistes du Québec (ODNQ) who may inspect the records and interview Stéphanie Lévesque, Dt.P.-Nutritionniste/RD as a part of its regulatory activities in the public interest. These governing bodies have their own strict confidentiality and privacy obligations. In addition, as a professional, Stéphanie Lévesque, Dt.P.-Nutritionniste/RD may be required by law to disclose personal health information to various government agencies such as children's aid societies or the police.

Secondary Purpose:

The personal email address could be used, if consent is obtained, to promote special events or opportunities that could benefit the health of the client.

Information Collected:

Personal information is collected only to the extend necessary for the services provided.

During an individual consultation, Stéphanie Lévesque, Dt.P.-Nutritionniste/RD can collect the following information:

Personal Characteristics: First name, last name, date of birth, gender, ethnicity, race or country of origin, home address, phone number, email address, credit card or payment information, familial status, use of tobacco, drugs and alcohol.

Health Information: health history, family health history, health condition, assessment results or diagnoses, prognosis, prescribed drugs, vitamins and supplements, health services provided or received, identity of health care providers, compliance to treatment, health measurements, samples or examination results, anthropometric data, nutritional problems and symptoms, identity of the substitute decision maker.

Activities and point of views: occupation, education, religion, financial status, beliefs and eating habits, physical activities.

An individual cannot request that part of the information not be on file. However, he may request that part of his file not be disclosed to other health information custodians or agents. Nevertheless, if Stéphanie Lévesque, Dt.P.-Nutritionniste/RD believes that a health information custodian or agent may need this information kept secret, she must inform the health information

custodian or the agent in question that some of the information (but not the information itself) was not disclose to him at the request of the individual.

Protecting and Retaining Personal Information

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD understands the importance of protecting personal information. Under no circumstances will the information collected be disclosed to a third party without prior written consent of the client unless the wellbeing of an individual would be compromised.

In order to protect personal information, the following procedures have been implemented:

Physical Safeguards

All physical files containing personal information, if they exist, are locked away in a filing cabinet. Under no circumstances, these documents can be accessed without the supervision of Stéphanie Lévesque, Dt.P.-Nutritionniste/RD.

Administrative Safeguards

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD and her subcontractors agree to respect this privacy policy.

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD and her subcontractors commit to questioning the relevance of collecting, using, disclosing, and retaining personal information.

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD and her subcontractors commit to keeping up to date in the field of technological science to maintain the highest level of confidentiality possible. She also commits to staying on the lookout for any changes to the Personal Information Protection and Electronic Documents Act (PIPEDA).

In the event where physical files would need to be transferred, the documents will be submitted in person to the petitioner or in a sealed envelope written “Confidential” to an authorized person. The identity of the authorized person will be verified. Where consent has been obtained, documents can also be transferred through Canada Post in a sealed envelope written “Confidential”.

All outdated physical documents containing personal information are first shredded and then recycled.

Technical Safeguards

All portable electronic equipment must be secured with a strong password that is changed every 72 days. This equipment must never be left unlocked without supervision. No personal information may be displayed on the screen if the workstation is left unattended.

Any documents containing personal information that can be linked to a customer are kept in an encrypted location and protected with a strong password (external encrypted hard drive). All

nutritional evaluation and follow-up notes are programmed to restrict the changes so that every modification made leaves a trace.

To a client's request and with implied consent, information can be transferred by encrypted email. No confidential information will be shared through text messages.

All electronic equipment must be protected with an up-to-date anti-virus system.

A back up of all encrypted electronic files is performed daily on a secured cloud service.

In the event of the purchase of new electronic equipment, once all the information has been transferred to the new device, the hard drive of the old device will be destroyed to avoid accidental disclosure of personal information.

In the case of virtual consultations, Stéphanie Lévesque, Dt.P.-Nutritionniste/RD uses a confidential, safe and easy to use platform. She also ensures that her environment is conducive to consultation and ensures confidentiality. An emergency (clinical and technical) plan is also developed before each consultation.

Under no circumstances, personal information can be released on social networks.

Openness about the Personal Information Process

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD undertakes to make this privacy policy easily accessible to the public.

Procedure

1. This privacy policy can be submitted to any individual requesting it;
2. This privacy policy is posted on the web site of Stéphanie Lévesque, Dt.P.-Nutritionniste/RD;
3. The public written statement is given to every client when first opening the chart at the same time as the consent form.

Disclosure of Personal Information to Ensure Security

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD is required by law to disclose information protected by professional secrecy in order to protect a person or group of persons when there is reasonable cause to believe that a serious risk of death or serious injury threatens that person or group.

Procedure:

- ✓ Stéphanie Lévesque, Dt.P.-Nutritionniste/RD undertakes to communicate only the information necessary for the purposes pursued by the communication;
- ✓ Stéphanie Lévesque, Dt.P.-Nutritionniste/RD undertakes to communicate only with the representative of the person(s) exposed to the threat or the people likely to provide assistance;

- ✓ Stéphanie Lévesque, Dt.P.-Nutritionniste/RD undertakes to specify that the information disclosed is protected by professional secrecy;
- ✓ The following information will be disclosed: the identity of the person(s) exposed to the threat, their contact information and the threat that is being sought to be prevented;
- ✓ As soon as possible after disclosure, the following information will be recorded in the individual's file: the reasons supporting the decision to disclose the information, the information disclosed, the method of communication, the name and contact information of the person to whom the information was disclosed, and the date and time.

Right to Access Personal Information

Individuals have the right (with some exceptions) to access personal information about themselves held by Stéphanie Lévesque, Dt.P.-Nutritionniste/RD. Individuals also have the right to know how this information was used and disclosed. This ensures that the personal information is adequate, correct and up to date.

Procedure :

- ✓ A written request is required (The form can be obtained through Stéphanie Lévesque, Dt.P.-Nutritionniste/RD);
- ✓ Stéphanie Lévesque, Dt.P.-Nutritionniste/RD commits to responding to an access request within 30 days following the reception of the request;
- ✓ Stéphanie Lévesque, Dt.P.-Nutritionniste/RD confirms the identity of the person who has made the request before disclosing the information;
- ✓ Stéphanie Lévesque, Dt.P.-Nutritionniste/RD takes the necessary measures to ensure the individual understands the content of the information provided (ex. : abbreviations);
- ✓ In the event a client would need a hard copy of the record, a fee of 30\$ will be charged for the first 20 pages and 0,25\$ for every additional page. Stéphanie Lévesque, Dt.P.-Nutritionniste/RD commits to providing an estimate of the cost and a receipt.

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD has the right to refuse an access. Grounds for refusal to access personal information would include:

- ✓ It is quality of care information or information generated for one of the governing body's quality assurances program;
- ✓ It is raw data from standardized psychological tests or assessments;
- ✓ There is a risk of serious harm to the treatment or recovery of the individual or of serious bodily harm to another person;
- ✓ The request is frivolous, vexatious and made in bad faith; Or
- ✓ The access would reveal the identity of a confidential source of information.

In the event of a refusal, the reason will be provided to the petitioner who has the right to complain to the Ordre des diététistes nutritionnistes du Québec. The personal health information cannot be destroyed until the individual has had a chance to challenge the refusal (30 days after the reception of the refusal).

Correction Request

Clients have the right to request a correction of erroneous information held by the organization. The purpose is to maintain appropriate and accurate information on clients.

Procedure :

- ✓ A written request is required (A request form can be obtained through Stéphanie Lévesque, Dt.P.-Nutritionniste/RD);
- ✓ Corrections are made without obliterating the original entry;
- ✓ Correction requests are restricted to factual information. Professional observations and opinions are not generally subject to correction requests;
- ✓ Grounds to refuse correction may be a request that is frivolous, vexatious or made in bad faith;
- ✓ Stéphanie Lévesque, Dt.P.-Nutritionniste/RD commits to responding to the request within 30 days of the reception of the request and providing an explanation in the event of a refusal;
- ✓ If possible and to the client's request, a third party who has received the erroneous information may be informed of the correction unless the correction cannot reasonably be expected to have an effect on the ongoing provision of health care or some other benefit to the individual;
- ✓ In the event of a disagreement, the individual can request that a notice of the disagreement be filed with the record;
- ✓ In the event of a refusal, the client will be informed of his right to complain to the Ordre des diététistes nutritionnistes du Québec.

Retention and Destruction of Personal Information

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD needs to retain personal information for some time to ensure that she can answer any questions clients might have about the services provided and for her own accountability to external regulatory bodies. Stéphanie Lévesque, Dt.P.-Nutritionniste/RD keeps paper and electronic files for at least 10 years from the date of the last client interaction or from the date the client turns 18. Some exceptional cases may require that a file be kept longer.

All paper documents containing personal information are first shredded before being recycled.

All electronic documents containing personal information are deleted in a manner that it cannot be restored.

A record of the destroyed chart is kept up to date and contains the following information: chart number, client's name, date of the last appointment and the date the chart was destroyed.

Termination of the Practice

In the event Stéphanie Lévesque, Dt.P.-Nutritionniste/RD would decide to terminate her practice, she commits to advising all her clients of the situation and informing them of the options available to them. All charts, books and records will be transferred to the external regulated bodies.

In the event Stéphanie Lévesque, Dt.P.-Nutritionniste/RD would want to sell her practice, the potential purchaser would want to perform a "due diligence" review of the records to ensure that it is a viable business that has been honestly portrayed. The potential purchaser must first enter into an agreement with Stéphanie Lévesque, Dt.P.-Nutritionniste/RD to keep the information confidential and secure and not to retain any information longer than necessary to conduct the due diligence. Once a sale has been finalised, Stéphanie Lévesque, Dt.P.-Nutritionniste/RD may transfer records to the purchaser but will make reasonable efforts to provide notice to the individual before doing so.

In the Event of Sudden Death or Incapacity

In the event of the sudden death or incapacity of Stéphanie Lévesque, Dt.P.-Nutritionniste/RD, all records (including personal health information) will be transferred to Alison Caron, Dt.P.-Nutritionniste/RD. The later does not have the obligation to pursue the practice of Stéphanie Lévesque, Dt.P.-Nutritionniste/RD but she must take the necessary precautionary measures to safeguards the interests of the clients and offer support to access new nutrition resources. Miss Alison Caron Dt.P.-Nutritionniste commits to respecting this privacy policy.

Complaints System

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD commits to making every effort to investigate and respond to a simple complaint within 30 days. In the event of a more complex complaint requiring more than 30 days, Stéphanie Lévesque, Dt.P.-Nutritionniste/RD undertakes to contact the client within 30 days to inform him of the period deemed necessary. If the complainant is not satisfied with the outcome of the file, the latter has the right to file a complaint to l'Ordre des diététistes-nutritionnistes du Québec or to the Information and Privacy Commissioner.

In the Event of a Breach of Confidentiality

Stéphanie Lévesque, Dt.P.-Nutritionniste/RD takes all the necessary measures to prevent a breach of confidentiality. Nevertheless, in the event of theft, loss or unauthorized access, the individuals concerned will be notified as soon as possible. If a confidential information is disclosed or at risk of accidental disclosure, the following protocol will be applied:

1. Evaluate if the Ordre des diététistes nutritionnistes du Québec needs to be informed;
2. Identify the extend of the disclosure and take the necessary measure to contain it;

- a. Determine what information has been disclosed and how (i.e. paper format, electronic format);
 - b. Determine if copies have been made;
 - c. Modify passwords and usernames as needed.
3. Identify and inform the individual(s) who's personal information has been disclosed
 - a. Choose the most appropriate method to inform the concerned individual(s) (ex. : telephone, letter, next appointment...);
 - b. Inform the concerned individual(s) of the measures that have been taken or will be taken to address the accidental disclosure;
 - c. Provide the necessary contact information in case the individual(s) would have more questions or concerns;
 - d. Inform the concerned individual(s) of their rights to file a complaint to the Ordre des diététistes nutritionnistes du Québec.
4. Perform an internal investigation to determine how and why the accidental disclosure occurred and take the necessary measures to prevent a second similar situation.
 - a. Determine whether training is necessary.
 - b. The Ordre des diététistes nutritionnistes du Québec will be informed of the outcome of the internal investigation and the actions taken to prevent a new similar event.

N.B. : This policy has been written in June 2018. It will be reviewed and, if need be, corrected, at least every year. Nevertheless, modifications can be made at all times if judged necessary. As a reference, the date of the last revision will be indicated at the bottom of this document.