



EVIDENCE-BASED
THERAPY

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PRIVACY POLICY

The privacy of personal information is an important concern. EBT3 is committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide.

Your Personal Information is now protected by privacy legislation. As health providers we are required to inform you about the personal information we collect and about how we use and protect that information.

What is Personal Information?

Personal information is information about an identifiable individual. It includes information that relates to: an individual's personal characteristics (e.g. gender, age, income, home address and phone number, ethnic background, family status); health (e.g. health history, health conditions, health services received by them); or, activities and views (e.g. religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual).

Personal information is different from business information (e.g. an individual's business address and telephone number.) This is not protected by privacy legislation.

Who We Are

EBT3 Psychology includes registered psychologists, registered psychologists under supervision, and an office assistant.

We use some agencies and consultants that may, in the course of their duties, have limited access to personal information we have. These include office supports, accountants and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

Collecting Personal Information: Primary Purposes

As psychologists, our primary purpose for collecting personal information is to provide psychological services. For example, we collect information about a client's health history including their family history, physical condition and function and social situation in order to help us provide the appropriate services, as well as to identify changes that occur over time.

Collecting Personal Information: Related and Secondary Purposes

We also collect, use and disclose information for purposes related to, or secondary to, our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To invoice clients for services that were not paid for at the time, to process credit card payments, to collect unpaid accounts, or to provide receipts and statements.
- The costs of some psychological services to clients are paid for by third parties (e.g., private insurance, WSIB). These third party payers often have your consent or legislative authority to clarify details about services directly with us so they can process your claim.



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Psychologists are regulated by the College of Psychologists of Ontario who may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, as professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. External regulators have their own strict privacy obligations.

Various government agencies (e.g. Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission) have the authority to review our files and interview our staff as a part of their mandates.

If our practice or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the practice or its assets would be provided access to personal information and only for the purpose of completing the “due diligence” search prior to closing the purchase.

Protecting Personal Information

In order to protect personal information, the following steps have been taken:

- Paper information is either under supervision or locked securely
- Electronic hardware is either under supervision or in a restricted area at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed envelopes by reputable companies.
- Electronic information is transmitted either through a direct line, has identifiers removed or is encrypted.
- Staff are trained to collect and use personal information only as necessary and in accordance with our Privacy Policy.

Retention and Destruction of Personal Information

Our regulatory body, the College of Psychologists of Ontario, requires that we keep our client files for at least 10 years after last contact (or in the case of children, for at least ten years past their 18th birthday).

Paper files containing personal information are destroyed by shredding. We destroy electronic information by deleting it and when the hardware is discarded, we ensure that the hard drive is physically destroyed.

Looking at Your Personal Information

With only a few exceptions, you have the right to see what personal information we hold about you. We reserve the right to charge a nominal fee for such requests. If you believe that there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation correcting any erroneous information.