

## PRIVACY POLICY

Dr. Pryke and Associates are committed to collecting, using, and disclosing personal information responsibly. We strive to be open and transparent regarding how we handle personal information. This document outlines our privacy policy and procedures.

### Definition of Personal Information

Personal Information is any information about an identifiable individual. Here are some examples:  
*personal characteristics* (e.g. name, home address, home phone number, age, marital status, ethnic background, education level)  
*health information* (health history, health conditions, health services received) and  
*activities and views* (community involvements, religious affiliation)

Personal information is different from business information (e.g. a person's business telephone number and address). Business information is not protected by privacy legislation.

### Collection and Use of Personal Information

#### Clients

The primary reason we collect and use personal information is to provide psychological services including psychological consultation and treatment. Psychological consultation involves getting a good understanding of you, your presenting problem(s) and treatment needs. Psychological treatment (psychotherapy) involves working with you to help you overcome or manage your presenting problem(s).

We also collect and use personal information to:

- Invoice you for services rendered
- To share certain information about you with third party payors, with your written consent to allow them to determine whether you are eligible for their benefits

We only collect the personal information that we believe is necessary to serve you such as your name, phone number, home address, age, marital status, family and social history, educational and occupational history, medical and psychological history, medical and psychological conditions, previous treatments, outcome(s), and current circumstances.

We only collect and use personal information with your consent (verbal and written) with the following exceptions:

- When we believe you would consent if asked and it is not practical to obtain consent first (e.g. a family member passes a message to us and we have no reason to suspect it is not genuine, an insurance carrier makes a routine inquiry to confirm services rendered)
- When the law requires us to collect or use information such as in an emergency situation

You can withdraw your consent at any time.

## Members of the General Public and Potential Clients who Contact our Office

We collect personal information to answer your questions about our services and/or to schedule an initial appointment.

We only collect the information that we believe is necessary to serve you like your name, telephone number, and reason for your inquiry.

We only collect information with your implied consent. Please note that your provision of your personal information implies consent.

You can withdraw consent.

Please note that we do not collect personal information or use cookies on our website. Also, we do not collect personal information in order to send mail-outs about our services.

### **Disclosure of Personal Information**

We are committed to keeping your personal information confidential. We steadfastly follow the confidentiality requirements of the College of Psychologists of Ontario. In general, this means that we do not share any personal information about you without your written consent. There are, however, a few exceptions in which confidentiality must be broken due to specific legal or ethical considerations. These conditions are quite rare and include:

- If you (or your child) express your intent to seriously harm yourself or someone else, a psychologist is required to notify the appropriate individual(s), e.g. emergency contact, police, emergency services.
- If you share information about a child, currently under the age of 16, who has been abused or neglected, or is at risk of being abused or neglected, a psychologist is required to notify Family & Children's Services.
- If you indicate that you or your child have been sexually abused by a Regulated Health Professional, a psychologist is required to report this information to the appropriate regulatory body. In this case your name does not have to be provided.
- If a court of law subpoenas your psychological record, a psychologist is required to release your records to the court.

Also, like all psychologists, we are regulated by the College of Psychologists of Ontario (CPO). The CPO may inspect our records or interview us as part of the Quality Assurance Program. Similarly, various government agencies (e.g. Office of the Privacy Commissioner, Canada Revenue Agency, Canadian Human Rights Commission) may inspect our records or interview us as part of their mandates. All of these agencies have their own strict privacy policies.

### **Protection of Personal Information**

We understand the importance of protecting your personal information. Here are some safeguards we employ:

- Paper information is either under supervision or stored in a locked or restricted area
- Electronic hardware (e.g. computer, flashdrives) are either under supervision or secured in a locked or restricted area
- Passwords are used on computers and computer files
- Paper information is transmitted through Canada Post or Purolator in sealed envelopes marked confidential

- Faxes are accompanied by a cover sheet with a privacy clause and an identified recipient. Also, faxes are only sent to organizations with a clear privacy policy that can be expected to keep information private (e.g. physician's offices, health care administrations).

## **Retention of Personal Information**

### Clients

We need to retain your personal information for several reasons. These reasons include:

- To make use of your older records to review progress if we have been treating you for a long time
- To answer any questions you might have about the services you received, even long after you have discontinued services
- To remain accountable to our regulatory body, i.e. the College of Psychologists (CPO).

The CPO requires that we retain records for a minimum of 10 years after the date of last contact. In the case of a child client (under the age of 18), the records are retained for 10 years after the age of 18 is attained.

In order to protect your privacy, we do not keep files beyond the 10 year minimum except in circumstances where abuse has been alleged or substantiated. These files are kept indefinitely.

In the unlikely event that your psychologist dies or becomes unable to practice due to lengthy illness or disability, your personal information will be placed in the care of another psychologist for protection and retention but not for examination.

### Members of the General Public

We only retain your information long enough to provide answers to your inquiry. If you do not become a client your information is destroyed.

## **Destruction of Personal Information**

We destroy paper files containing personal information by shredding. We destroy electronic records by deleting the files or physically destroying the hard drive as appropriate.

## **Access to Personal Information**

You are permitted to view and/or make copies of your personal file and the information contained therein with only a few minor exceptions (e.g. the information will harm you or someone else). You may be asked to put your request for personal information in writing. The files cannot leave the office and hence you will be required to pay 25 cents per page for copies.

If we cannot comply with your request for personal information you will be notified within 30 days.

You may not obtain raw test data due to copyright and other legal restrictions on psychological test data.

## **Challenges to the Accuracy of Your Personal Information**

You have the right to challenge the accuracy of your personal information. You may be asked to put your challenge in writing. If the psychologist agrees that she has made a mistake, she will a) correct the mistake and b) send a copy of the correction to every individual who has received the mistaken personal information. If the psychologist does not agree that she has made a mistake, she will a) permit you to put a statement of disagreement in the file and b) send a copy of this statement to everyone who has been provided with your personal information.

## Questions or Concerns

Our Information Officer is Dr. Kris Pryke. Dr. Pryke would be happy to discuss any concerns you might have about the privacy policy with her. Her contact information is:

Dr. Kris Pryke  
238 King St. S.  
Waterloo, Ontario N2J 1R4

Phone: 519-496-9555  
Fax: 519-954-2712  
Website: [drkrispryke.com](http://drkrispryke.com)  
Email: [info@drkrispryke.com](mailto:info@drkrispryke.com)

If you wish to make a formal complaint, you can do so in writing to the attention of Dr. Kris Pryke. She will acknowledge your complaint, investigate it promptly, and let you know in writing the outcome of her decision and the reasons behind her decision. If she cannot satisfy your complaint, you are entitled to make a complaint to either 1) The Privacy Commissioner of Canada or 2) our regulatory body, the College of Psychologists of Ontario. Contact information is as follows:

- 1) Office of the Privacy Commission of Canada  
112 Kent St  
Pace de Ville, Tower B, 3r Floor  
Ottawa, Ontario K1A 1H3

Phone: 613-947-1698  
Toll free: 800-282-1376  
Fax: 613-947-6850  
Web: [www.privcom.gc.ca](http://www.privcom.gc.ca)

- 2) Ontario College of Psychologists  
110 Eglinton St, Suite 500  
Toronto, Ontario M4R 1A3

Phone: 416-961-8817  
Toll free: 800-489-8388  
Fax: 416-961-2635  
Web: [www.cpo.on.ca](http://www.cpo.on.ca)