



Privacy Policy

Privacy of personal information is important to Blueprint Nutrition. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We also try to be transparent as to how we handle personal information. This document describes our privacy policies.

WHAT IS PERSONAL INFORMATION?

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, home address or phone number) and their health (e.g., health history, health conditions, health services received). Personal information is to be contrasted with business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

WHO WE ARE

Our organization, Blueprint Nutrition, includes Rosanne Robinson, Registered Dietitian and any associate dietitians. We interact with a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These may include, but not be limited to, computer consultants, office security and maintenance, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, dietetic interns, volunteers, and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also obtain their assurance that they follow appropriate privacy principles.

WE COLLECT PERSONAL INFORMATION:

i) About Clients

The primary purpose for collecting personal information from our clients is to provide you with dietary services. For example, we collect information about your health and diet history, including your family history, physical condition and function and social situation in order to help us assess what your health care needs are, to advise you of treatment options and then to provide the health care you choose to have. We also collect personal information to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that may occur over time. It would be rare for us to collect such information without a client's express consent, but this might occur in an emergency (e.g., if you were unconscious) or where we believe you would consent if asked and it is impractical to obtain consent (e.g., parents may provide personal information for dependents; spouses may provide information for each other).

ii) About Members of the General Public

On our website we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email message, to register for a course, to subscribe to our newsletter). Cookies are only used to help users navigate our website and are not used to monitor activity.

iii) Other Purposes:

We also may collect, use and disclose personal information for other reasons. To help you understand our practices, some of the most common examples are as follows:

- To invoice clients for services that were not paid for at the time, to process credit card payments or to collect unpaid accounts.
- To review client files for the purpose of ensuring that we provide high quality services



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- To allow us to contact you and maintain communication with you (e.g. book/confirm appointments).
 - To communicate with your other treating health care providers including, but not limited to, your family doctor, referring and referral specialists (only if this was consented to in the original agreement).
 - For teaching and demonstrating purposes, on an anonymous basis.
 - To comply with legal and regulatory requirements, as required by the College of Dietitians of Ontario (CDO), who may inspect our records as part of their regulatory activities in the public interest.
 - Clients or other individuals we deal with may have questions about our services after they have been received. We also provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services (the CDO also requires us to retain our client records).
 - To permit potential purchasers and clinic advisors to evaluate Blueprint Nutrition's practice and/or conduct an audit in preparation for a sale of the business and/or its assets. Such access would be on a strictly limited basis (e.g. no copying or removal of information) and only after a written confidentiality agreement is provided to us. Only reputable purchasers who have already agreed to buy our business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to participate in some of these purposes by declining to receive notice of special events or opportunities and by paying for your services in advance. We do not, however, have any choice about many of these purposes (e.g., external regulation).

PROTECTING PERSONAL INFORMATION

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must enter into privacy agreements with us.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, to protect your privacy, we do not want to keep personal information any longer than necessary. We keep our client files for about ten years. We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure the hard drive is physically destroyed.

YOU CAN LOOK AT AND CORRECT YOUR INFORMATION

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a fee for such requests.



If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe 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 that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

Do you have a question? Our Information Officer is Rosanne Robinson, RD and can be reached at:

Affinity Health Clinic
3 Waterloo St., New Hamburg, ON M3A 1S3
Phone: (519)-574-3614
Email: rosanne@blueprintnutrition.ca

She will try to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer, Rosanne Robinson. She will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

If you have a concern about the professionalism or competence of our services or the mental or physical capacity of any of our professional staff we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory body.

College of Dietitians of Ontario
5775 Yonge Street, Suite 1810, Box 30
Toronto, ON M2M 4J1
Phone: 1-800-668-4990

This policy is made under the Personal Information Protection and Electronic Documents Act which also provides for some exceptions to the privacy principles and some rare exceptions to the commitments set out above.

For more general inquiries, the Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes.

The Privacy Commissioner can be reached at:

112 Kent Street
Ottawa, ON K1A 1H3
Phone: 1-800-282-1376
www.privcom.gc.ca