

THE HERBAL CLINIC & DISPENSARY PERSONAL INFORMATION & PRIVACY POLICY

The privacy of your information is important to us at The Herbal Clinic & Dispensary.

We believe that personal information should be collected, used and stored responsibly. We have a strict policy of maintaining patient confidentiality at all times. Our goal is to provide personalized, wellness services for our customers and patients. Sharing your personal health history information with us will help us to make appropriate decisions regarding your health. We want you to feel comfortable that we make every effort to protect your privacy and the confidentiality of any information that you willingly provide us.

WHAT IS PERSONAL INFORMATION?

Personal Information refers to information that identifies you as an individual and includes information about your full name, family status, occupation, address, telephone number and age as well as personal information about your lifestyle and your physical, mental, and emotional health.

THE HERBAL CLINIC & DISPENSARY—WHO WE ARE.

The Herbal Clinic & Dispensary is a walk in Herbal Dispensary and clinic which is open to the public. Both over the counter and private herbal consultations are available. The dispensary is staffed by fully trained herbal medicine practitioners, and their qualified assistants. The dispensary and herbal clinic is an approved training facility for clinical and medical herbalists. Our business also provides a practitioners clinic which includes practitioners of complimentary healthcare from a variety of different modalities including Traditional Chinese Medicine, Homeopathy, Massage Therapy, Holistic Nutrition, Naturopathy, Psychology and Bowen Therapy. All students, assistants, and practitioners at The Herbal Clinic & Dispensary must sign an agreement to adhere to The Herbal Clinic & Dispensary's privacy and confidentiality policies. Individuals who violate these policies may be subject to disciplinary action, up to and including dismissal. Our bookkeepers and Web-site designers do not have access to any personal health information.

WHY DO WE COLLECT PERSONAL INFORMATION? PRIMARY PURPOSE.

A wide range of personal questions may be requested from you relating to your identity, general health (both past and present), lifestyle, and physical, psychological and mental symptoms, signs and experiences. This information will be used to enable us to make informed decisions regarding your health needs and also to ensure that we have proper records of your health history while you are under our care. We adhere to the Ontario Herbalists Associations Code of Practice and Code of Ethics, a copy of which is available online at www.herbalists.on.ca.

We may require you to provide personal information so that we can respond to a query or provide you with information, or a service that you have requested. You will have the option to provide this information and we may indicate whether any information we request from you is optional or mandatory. Mandatory information is information we consider to be necessary for us to provide you with a specific service such as keeping a record of clinic consultation visits and a record of herbal formulas. You have the choice not to provide such information.

Any information collected by us from you will be treated as confidential and will only be used to keep proper records of clinic consultation visits, records of formulas or products dispensed, to notify you about the availability of recommended products, or possible changes to your appointments or about herbal formula.

WHY WE MIGHT COLLECT OTHER INFORMATION—SECONDARY PURPOSES.

You can choose not to be a part of some of these secondary purposes excepting misconduct reports. The most common reasons that we collect personal information are as follows.

- To properly invoice our patients, practitioners, students and customers.
- To advise patients and others about workshops, newsletters and events offered through The Herbal Clinic & Dispensary. We collect only names, telephone numbers and, or e-mails solely for the purpose of sharing this type of information. Individuals on our e-mail list can ask to be removed from our list at any time.
- To allow for special investigations related to misconduct reports.
- To allow third party payment of services. For example, insurance companies may request information to ensure coverage of services.
- To allow for information to be shared with our patients after information has been collected and received, for example, if a patient requests information long after being seen in our clinic. We keep files for seven years.
- To provide information to a purchaser if they requested a "due diligence" review of The Herbal Clinic & Dispensary if the business was sold.
- To allow for individuals to sign up for workshops, newsletters and events offered through The Herbal Clinic & Dispensary.

HOW WE COLLECT INFORMATION.

At The Herbal Clinic & Dispensary we collect personal information in order to provide patients with personalized wellness information, wellness recommendations, and natural health products and services. We may obtain this information in a variety of ways:

- Directly from patient intake forms filled out at the clinic or filled out by patients at home and then brought into the clinic.

- Directly from questionnaires, notes, faxes, and diagnostic test results which are brought in by the patient to the clinic. We do not use off-site fax services.
- From private and student clinic consultations and over the counter consultations.
- From telephone conversations directly with community practitioners, The Herbal Clinic & Dispensary practitioners, our dispensary customers and our patients.
- From e-mail communication. We never use e-mail to communicate **personal health** information.
- From sign-up sheets in our Dispensary which promote workshops, newsletters and events offered through The Herbal Clinic & Dispensary.

DISCLOSURE OF INFORMATION.

The Herbal Clinic & Dispensary does not disclose patient information or over the counter consultation information to anyone without your prior consent.

WE USE APPROPRIATE SECURITY SAFEGUARDS.

- At The Herbal Clinic & Dispensary, security of private information is a priority. We employ appropriate measures to protect private information against unauthorized access, disclosure, alteration or destruction. These may include, among others, encryption, physical access security and other appropriate safeguards.
- The Herbal Clinic & Dispensary paper case notes are kept in a locked filing cabinet.
- Patient formula cards are stored behind the counter and do not bear personal health information.
- Telephone numbers on new patient formula cards are encrypted.
- At The Herbal Clinic & Dispensary, computers are not used to store personal information.
- Paper information is transmitted in sealed, addressed envelopes.
- The Herbal Clinic & Dispensary students collect, use and disclose personal information only as necessary to fulfill their duties.

WE ARE COMMITTED TO PROTECTING THE CONFIDENTIALITY OF PERSONAL INFORMATION.

The Herbal Clinic & Dispensary limits access to personal information to the clinic director and students of The Herbal Student Clinic. These individuals must sign an agreement to adhere to The Herbal Clinic & Dispensary's privacy and confidentiality policies. Individuals who violate these policies may be subject to disciplinary action, up to and including dismissal. Although we keep personal information for some time to ensure that we can answer any questions you may have about our services we do not keep files for longer than we think necessary. We keep our patient files for seven years. We destroy paper files by shredding.

YOU CAN LOOK AT YOUR PERSONAL INFORMATION.

With few exceptions, you have the right to see what personal information we hold about you. If you would like to request this please do so in writing and we will be glad to assist you. You have the right to work with us to correct information which you view as being inaccurate.

CONTACT US.

Our information officer, Celina Ainsworth can be contacted at the following address:

The Herbal Clinic & Dispensary
 409 Roncesvalles Avenue
 Toronto, ON, M6R 2N1
 416-537-5303
www.theherbalclinicanddispensary.com

She will arrange to answer any questions that you may have.

If you wish to make a complaint about our privacy policy, you may make it in writing to the privacy officer.

For more general enquires you may contact the Information and Privacy Commissioner of Canada. Tel: 613-995-8210 (toll free) or visit the web site: www.privcom.gc.ca.



Celina Ainsworth, Clinic Director