PRIVACY POLICY: CV WELLNESS GROUP
Operating as WATERDOWN VILLAGE CHIROPRACTIC AND WELLNESS GROUP
Effective Date: February 2026

Privacy of personal information is an important principle to CV Wellness Group operating as Wellness Waterdown Village Chiropractic And Wellness Group (WVCWG). We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We also try to be open and 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, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). 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 as Health Information Custodians

Defining of Roles:
- Privacy Officer: *Layla Behaeen (Director of Operations)*
- Chief Health Records Custodian: *Dr. Cheryl van der Mark (Clinic Director)*
- Health Information Custodians: *All Health Practitioners*
- Agents Of Health Information Custodians: *Interns, students, and Wellness Health Assistant Staff*

We use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include computer consultants, office security, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, website managers, students, interns, cleaners and lawyers. We restrict their access to any personal information we hold as much as is reasonably possible. We also have written contracts of confidentiality that assures they follow appropriate privacy principles.

PRIMARY PURPOSES FOR COLLECTING PERSONAL INFORMATION:

About Clients
As health care practitioners, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide appropriate therapeutic treatment within the scope of chiropractic care, physiotherapy, registered massage therapy, naturopathic medicine, lactation consulting, holistic nutrition and other multi-disciplinary services. For example, we collect information about a client's identifying information such as address, name, phone number, e-mails, sex, gender, medical contacts; health information such as health history, including their family history, physical condition and function and social situation in order to help us assess what their health needs are, to advise them of their options and then to provide the health care they choose to have. A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that are occurring over time. Personal health information may be shared among health care providers within our clinic involved in your care (the 'circle of care') for the purpose of providing you with appropriate treatment, unless you instruct us otherwise. It would be rare for us to collect such information without the client's express consent, but this might occur in an emergency (e.g., the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from our client and we have no reason to believe that the message is not genuine).

About Members of the General Public
For members of the general public, our primary purposes for collecting personal information are to provide notice of special events (e.g., a seminar or conference) or to make them aware of our wellness services in general or our clinic in particular. For example, we might collect home addresses, fax numbers and email addresses. We obtain consent, either express or implied where appropriate before using any such personal information, but where this is not, for any reason, possible, we will upon request immediately remove any personal information from our distribution list. 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, to process payment). Cookies and similar technologies may be used to improve website functionality and understand user interaction. Where applicable, analytics tools may collect non-identifiable usage data

About Contract Staff, Volunteers and Students

For people who are contracted to do work for us (e.g., temporary workers), our primary purpose for collecting personal information is to ensure we can contact them in the future (e.g., for new assignments) and for necessary work-related communication (e.g., sending out paycheques, year- end tax receipts). Examples of the type of personal information we collect for those purposes include home addresses, e-mails and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of a health emergency (e.g., a communicative disease outbreak) or to investigate a possible breach of law (e.g., if a theft were to occur in the clinic). If contract staff, volunteers or students wish a letter of reference or an evaluation, we will collect information about their work-related performance and provide a report as authorized by them.

RELATED AND SECONDARY PURPOSES FOR COLLECTING PERSONAL INFORMATION:

Like most businesses, 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 goods or services that were not paid for at the time, to process credit card payments or to collect unpaid accounts.
- To advise clients that their product or service should be reviewed (e.g., to ensure a product is still functioning properly and appropriately for their current needs and to consider modifications or replacement).
- To advise clients and others of special events or opportunities (e.g., a seminar, development of a new service, arrival of a new product) that we have available.
- Our clinic reviews client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g., regulatory auditors, lawyers, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing quality improvement reviews of our Clinic, including reviewing client files and interviewing our staff.
- The regulatory bodies/colleges of each profession 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. Also, our organization believes that it should report information suggesting serious illegal behaviour to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals, to support the concern (e.g., improper services). Also, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to us.
- The cost of some goods/services provided by the organization to clients may be paid for by third parties (e.g., OHIP, WSIB, MVA, WSIB, private insurance, Assistive Devices Program). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- Clients or other individuals we deal with may have questions about our goods or 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 records in accordance with the requirements of the applicable regulatory Colleges, generally a minimum of 10 years from the last patient contact or as otherwise required.
- If CV Wellness Group, operating as Waterdown Village Chiropractic and Wellness Group, or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the Clinic’s 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 the files, the purchaser must provide a written non-disclosure agreement to keep all personal information confidential. Only reputable purchasers who have already agreed to enter into negotiations to purchase the organization’s 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. All such activities will be conducted in accordance with applicable privacy legislation.
- In the event that an individual health practitioner leaves the clinic to pursue their practice elsewhere, there are guidelines in place to prevent confusion of client file ownership and health information abandonment. While health information contained within a file belongs to the client and can be released only with their consent, a practitioner may retain personal possession of a copy of the records or make arrangements for another custodian to assume the responsibility, as in the sale of a practice to another practitioner. The client will always be notified of the change in business location and any movement of the file.

You can choose to opt out of being part of some of these related or secondary purposes (e.g., by declining to receive notice of special events or opportunities, by paying for your services in advance). We do not, however, have much choice about some of these related or secondary 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.
- Passwords are used on all our computers, firewalls are used on our system, and two factor authentication is used on our electronic health records systems.
- A cyber policy is in place and all staff, contractors and associates have signed and agreed to abide by cyber policies
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or is secured using appropriate safeguards such as encryption where applicable.
- Personal health information may be communicated by email only with your informed consent, acknowledging the potential risks of electronic transmission.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- We use reputable, professional IT companies to secure our system;
- We use PHIPA and PIPEDA compliant electronic health records, sharing of information programs, and telehealth platforms
- External consultants and agencies with access to personal information must enter into privacy agreements with us.
- In the event that personal health information is stolen, lost, or accessed, used or disclosed without authority, we will notify the affected individual at the first reasonable opportunity and inform them of their right to make a complaint to the Information and Privacy Commissioner of Ontario, in accordance with the Personal Health Information Protection Act (PHIPA). Where required, we will also report the breach to the Information and Privacy Commissioner of Ontario and take appropriate steps to contain, investigate, and prevent future occurrences.

Knowledge and consent of the individual is generally required for the collection, use and disclosure of personal information, except where permitted or required by law Personal information can only be used or disclosed for the purpose for which it was obtained unless:

- a further consent is obtained, or
- there is legal authority to use or disclose the information without consent

The new use and the consent or other legal authority to use or disclose it should be documented. Legal authority to use personal information without consent exists in the following circumstances:

- where its collection is clearly in the interests of the individual and consent cannot be obtained in a timely way (e.g., medical emergency),
    - even if not collected for that purpose, there is an emergency that threatens the life, health, or security of the individual,
    - where its collection was to investigate a breach of a Canadian law or agreement (e.g., a contract) and knowledge or consent would reasonably compromise the investigation,
    - even if not collected for that purpose, the information is reasonably used for the investigation or a breach of law in Canada or elsewhere,
- publicly available information specified in regulation (e.g., telephone directories, professional directories, statutory registries, court records and information provided by the individual to newspapers, magazines and books), or specific research situations

Legal authority to disclose personal information without consent exists in the following circumstances:

- to the organizations lawyer,
- for debt collection purposes,
- to comply with subpoena, warrant or court order,
- at the request of a government institution for national security, law enforcement or administration,

- at the initiative of the organization, to provide information to a government institution or a specified investigative body relating to law enforcement or national security,
- at the initiative of a specified investigative body relating to law enforcement,
- where there is an emergency that threatens the life, health or security of an individual so long as the person to whom the information relates is then advised in writing right away,
- publicly available information specified in regulation (e.g., telephone directories, professional directories, statutory registries, court records and information provided by the individual to newspapers, magazines and books),
- to an archive,
- 20 years after the death of the people to whom the information relates or after 100 years after the record was made,
- Specific research situations, or
- Where disclosure is required by law.

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.

We keep our client files for a minimum of seven to ten years after the last contact with our client. Upon request by the client, we will remove contact information from electronic lists right away. We keep any personal information relating to our general correspondence, newsletters, seminars and marketing activities for an appropriate time after the newsletter ceases publication or a seminar or marketing activity is over, unless requested to remove

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

YOU CAN LOOK AT YOUR INFORMATION
With only a few exceptions, you have the right to see what personal information we hold about you. 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 nominal 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 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 Privacy Officer is the contact person to whom you may direct questions or concerns regarding your personal health information and privacy in our office. At CV Wellness Group/Waterdown Village Chiropractic and Wellness Group, the Privacy Officer is:

Layla Behaeen
Waterdown Village Chiropractic And Wellness Group
255 Dundas Street E. Unit 14A
Waterdown ON L8B 0E5
Phone (905) 689-4440
info@wvchirogroup.ca
www.wvchirogroup.ca

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. 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 bodies:

College of Chiropractors of Ontario
130 Bloor Street West, Suite 902 Toronto, ON M5S 1N5
Phone: 1-877-577-4772 Website: https://cco.on.ca

College of Physiotherapists of Ontario
375 University Avenue, Suite 800 Toronto, ON M5G 2J5
Phone: 1-800-583-5885 ext. 201 Website: www.collegept.org

College of Massage Therapists of Ontario
1867 Yonge Street, Suite 810 Toronto, Ontario M4S 1Y5
Phone: 1-800-456-1933 Website: www.cmto.com

College of Naturopaths of Ontario
150 John Street, 10th Floor Toronto, ON M5V 3E3
Phone: 1-877-361-1925 Website: www.collegeofnaturopaths.on.ca

This policy is made in accordance with the **Personal Health Information Protection Act (PHIPA)**. As a health care organization operating in Ontario, CV Wellness Group operating as Waterdown Village Chiropractic and Wellness Group is a Health Information Custodian under PHIPA. Where applicable, we also comply with the **Personal Information Protection and Electronic Documents Act (PIPEDA)**.It is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

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

The **Information and Privacy Commissioner of Ontario** can be reached at:

2 Bloor Street East, Suite 1400
Toronto, ON M4W 1A8
Phone: 1-800-387-0073
Website: www.ipc.on.ca

The **Information and Privacy Commissioner of Canada** can be reached at:
112 KENT STREET
OTTAWA, ONTARIO K1A 1H3
TOLL-FREE 1-800-282-1376 FAX (613) 947-6850 | TTY (613) 992-9190
www.privcom.gc.ca