



Privacy Policy:

Intent:

East Village Animal Hospital is committed to protecting the privacy of the personal information of its employees, volunteers, clients and other stakeholders. We value the trust of those we deal with and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that our constituents share with us.

Policies and procedures have been developed to meet the 10 principles as outlined in the Personal Information Protection and Electronic Documents Act (PIPEDA).

1. Accountability

We are accountable for all personal information in our possession. All employees, volunteers, agents and authorized service providers of East Village Animal Hospital are required to protect the confidentiality of personal information. Every precaution is always made to ensure confidentiality of all personal information.

2. Identifying Purposes

We request and use personal information only for certain purposes that we identify.

We request and use personal information only to:

- Process applications for registering as an East Village Animal Hospital client
- Keep appropriate veterinary records
- Keep appropriate personnel records on volunteers and employees

Personal information requested will be limited to that required for the purpose identified by us.

Regarding application processing, all financial information is immediately destroyed (paper copy will be shredded, electronic copy will be deleted) following a 'Yes/No' annotation that the registrant is above or below the Stats Canada Low- Income Cut-offs or has provided other appropriate documentation.

3. Consent

We collect and use personal information only with expressed permission. Permission may be expressed in writing or be implied, and may be given verbally or electronically.

Information will be made available to third parties where it is required by legal order.

4. Limiting Collection

We will only collect personal information related to a specified purpose and only what is needed for that purpose.

5. Limiting Use, Disclosure and Retention

We do not sell personal information.

We will keep personal information only as long as it is necessary to satisfy the purposes for which it is obtained, or as required by the College of Veterinarians of Ontario. When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

6. Accuracy

We keep personal information accurate and up to date. We maintain appropriate procedures to ensure that personal information in our possession is accurate and up to date. People whose personal information has been collected by EVAH are entitled to seek correction of their personal information if they believe that the information in our possession is not correct.

7. Safeguards

We protect personal information against loss, theft, as well as unauthorized access, disclosure, copying, use or modification. The level of security is appropriate to the sensitivity of the information.

Access to personal information is restricted to East Village Animal Hospital staff and authorized volunteers. Access is granted on a need-to-know basis and monitored by the organization's Veterinary Owners. All EVAH staff and volunteers who have access to personal information have received training on the importance and proper handling of personal information.

Personal information is stored in locked cabinets and/or password protected databases.

8. Openness

We will be open about our privacy practices. East Village Animal Hospital will make readily available to any interested party specific information about our policies and practices relating to the management of personal information.

9. Individual Access

We will allow individual access to a constituent's personal information, recognizing they have the right to know if we hold any personal information about them, how it was collected, if it is accurate, and how we are using it. We require up to 24 hours notice to enable access without compromising the privacy of our other staff and volunteers.

10. Challenging Compliance

We have a simple and accessible complaint procedure. Anyone whose information is held by EVAH may register a privacy-related complaint by contacting one of EVAH's Veterinary Owners. The Veterinary Owner will explain the procedure for filing a complaint and the process of its investigation. If an objection is found to have merit we will take appropriate steps to repair the situation, including changing our policies and practices if necessary.

Procedure:

1. All staff and volunteers who handle personal information on behalf of East Village Animal Hospital (EVAH) will be required to participate in Privacy Policy and Procedures training and sign a Confidentiality Agreement.
2. The reason for the collection of personal information must be clearly stated verbally or in writing at the time of the collection of private information.
3. The information collected must be used only for the reason stated at the time of collection. Permission must be sought to use the information for any other purpose.
4. If a staff, volunteer or other key stakeholder expresses a desire to "opt out" of any particular use of their personal information adjustments, must be made to all records to reflect this wish as soon as possible.

5. All personal information will be kept in locked files and password protected computer environments. Animal records will be faxed to other veterinarians only following the directive of the client.
6. Personal information will not be kept indefinitely. Records will be shredded by the one of the Veterinary Owners or the Hospital Manager in accordance with legal requirements of the College of Veterinarians of Ontario.
7. Staff, volunteers, and other key stakeholders, may request a viewing of the information held by East Village Animal Hospital, with up to 24 hours notice. The records will be made available by a Veterinary Owner or Hospital Manager in a timely fashion and assure that access does not breach the confidentiality of other private information stored in the same environment.
8. A Veterinary Owner or Hospital Manager may refuse access to a record containing personal information in cases involving the courts, or where the security of the organization is compromised. Any refusal to access personal information will be reported to the Privacy Commissioner in accordance with the Personal Information Privacy Electronics Documents Act (PIPEDA).
9. Staff, volunteers and clients have the right to file a complaint about the handling of their private information. An EVAH Veterinary Owner will provide a complaint form to anyone wishing to file a complaint with East Village Animal Hospital. A record of the outgoing complaint form will be made. The complaint must be filed within two weeks of requesting the form for a timely review. Once the complaint is received the Privacy Officer will review it; a remedy will be sought, approved by an EVAH Veterinary Owner and proposed to the complainant. If this remedy is acceptable it will be executed, and the case will be considered resolved. A copy of the complaint and resolution will be filed with the Privacy Commissioner. If the remedy is not considered acceptable by the complainant, they will be asked to provide the terms of what they would like to see happen to resolve the complaint. This will be taken to the owner for review. If the terms are not acceptable it will be forwarded to the Privacy Commissioner if a resolution cannot be reached internally.