

## PRIVACY POLICY

Genesis Rehabilitation Ltd. (hereafter Genesis Rehabilitation) is committed to delivering quality-assured service that is grounded in integrity and respect for our clients and customers. As providing this service involves the collection, use and disclosure of some personal information about our clients and customers, protecting their personal information is one of our highest priorities.

While we have always respected the privacy of our clients and customers and safeguarded their personal information, we have strengthened our commitment to protecting personal information under British Columbia's *Personal Information Protection Act* (PIPA) and the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA). PIPA sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information, while PIPEDA sets out ground rules for how businesses may collect, use and disclose personal information across provincial and international borders.

We want to inform our clients and customers of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Policy, in compliance with PIPA and PIPEDA, outlines the principles and practices we follow in protecting the personal information of our clients and customers. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' and customers' personal information. It also allows our clients and customers to request access to, and correction of, their personal information.

### Definitions

**Personal Information:** information about an identifiable individual (e.g., name, age, home address and phone number, social insurance number, marital status, religion, income, medical information, education, employment information). Personal information does not include contact information (described below).

**Contact information:** information that would enable an individual to be contacted at a place of business which includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy, PIPA or PIPEDA.

**Privacy Officer:** the individual designated responsible for ensuring that Genesis Rehabilitation complies with this policy, PIPA and PIPEDA.

### Policy 1 - Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the client or customer voluntarily provides his or her personal information for those purposes, we will

communicate the purposes for which personal information is being collected, either verbally or in writing, before or at the time of collection.

- 1.2 We will only collect client or customer information that is necessary to fulfill the following purposes:
- To provide vocational rehabilitation and/or disability management services. Information we collect for this purpose includes all manner of personal information.
  - To register customers in a course. Information we collect for this purpose is name, email address, and city location. While payment for courses is required, Genesis Rehabilitation does not collect or store credit card information. This information is handled through a secure payment gateway by a third party (PayPal) service provider.
  - To contact our customers with course updates. Information we collect for this purpose includes customer name and email address.

## **Policy 2 - Consent**

- 2.1 We will obtain client and/or customer consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided in writing via letter, email or fax as well as electronically on our website where applicable or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the client and/or customer voluntarily provides personal information for that purpose.
- 2.3 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients and/or customers can withhold or withdraw their consent for Genesis Rehabilitation to use their personal information in certain ways. A client's and/or customer's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client and/or customer in making a decision.
- 2.4 We may collect, use or disclose personal information without the client's and/or customer's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law;
  - In an emergency that threatens an individual's life, health, or personal security;
  - When the personal information is available from a public source (e.g., a telephone directory);
  - When we require legal advice from a lawyer;
  - To protect ourselves from fraud;
  - To investigate an anticipated breach of an agreement or a contravention of law

### **Policy 3 - Using and Disclosing Personal Information**

- 3.1 We will only use or disclose client and/or customer personal information where necessary to fulfill the purposes identified at the time of collection.
- 3.2 We will not use or disclose client and/or customer personal information for any additional purpose unless we obtain written consent to do so.
- 3.3 We will not sell or rent client and/or customer lists or personal information to other parties.

### **Policy 4 - Retaining Personal Information**

- 4.1 If we use client and/or customer personal information to make a decision that directly affects the client and/or customer, we will retain that personal information for at least one year to allow the client and/or customer a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client and/or customer personal information only as long as necessary to fulfill the identified purposes of a legal or business purpose.

### **Policy 5 - Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that client and/or customer personal information is accurate and complete where it may be used to make a decision about the client and/or customer or disclose to another organization under the circumstances previously described.
- 5.2 Clients and/or customers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the clients' and/or customers' correction request in the file.

### **Policy 6 - Securing Personal Information**

- 6.1 We are committed to ensuring the security of client and/or customer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

- 6.2 The following security measures will be followed to ensure that client and/or customer personal information is appropriately protected:
- the use of locked filing cabinets
  - physically securing offices where personal information is held
  - the use of passwords, encryption, firewalls
  - restricting employee access to personal information as appropriate (i.e., only those that need to know will have access)
  - contractually requiring any service providers to provide comparable security measures.
  - ensuring third party service providers have privacy policy provisions and uphold a similar standard to those held by Genesis Rehabilitation
- 6.3 We will use appropriate security measures when destroying client's and/or customer's personal information such as shredding documents and deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

### **Policy 7 - Providing Clients and/or Customers Access to Personal Information**

- 7.1 Clients and/or customers have the right to access their personal information, subject to limited exceptions.
- solicitor-client privilege
  - disclosure would reveal personal information about another individual
  - health and safety concerns
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.
- 7.3 Upon request, we will also tell clients and/or customers how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client and/or customer of the cost and request further direction from the client and/or customer on whether we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the client and/or customer in writing providing the reasons for refusal and the recourse available to the client and/or customer.

## **Policy 8 - Questions and Complaints: The Role of the Privacy Officer or Designated Individual**

- 8.1 The Privacy Officer is responsible for ensuring Genesis Rehabilitation's compliance with this policy and the Personal Information Protection Act and/or the Personal Information Protection and Electronic Documents Act.
- 8.2 Clients and/or customers should direct any complaints, concerns or questions regarding Genesis Rehabilitation's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client and/or customer may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Genesis Rehabilitation's Privacy Officer:

Name: Arlene Ward  
Phone: 250-756-7946  
Email: [arlene@genesisrehab.ca](mailto:arlene@genesisrehab.ca)