

PRIVACY STATEMENT

Last Updated: April 2024

This Privacy Statement applies to Wentworth-Halton X-Ray and Ultrasound Inc.'s (WH X-Ray) services, website and third-party on-line services.

Wentworth-Halton X-Ray and Ultrasound Inc. recognizes the importance of privacy and the sensitivity of personal information, in particular, personal health information. Protecting the privacy of personal information is an important component in the provision of quality diagnostic imaging services to our patients. We are committed to collecting, using, and disclosing your personal information in a responsible fashion, and only to the extent necessary for the services we provide.

In this Privacy Policy, “**you**” or “**your**” means an individual who interacts with WH X-Ray with respect to WH X-Ray’s services (the “**Services**”). For clarity, where applicable and where permitted by law, the term “you” or “your” refers also to you on behalf of (a) your minor children and (b) those individuals for whom you are the substitute-decision maker.

Wentworth-Halton X-Ray and Ultrasound Inc. (collectively, “**WH X-Ray**” or “**we**” or “**our**” or “**us**”) respects your privacy and is committed to maintaining the privacy and security of your personal information in accordance with applicable privacy legislation, including the *Personal Information Protection and Electronic Documents Act* amended by the *Digital Privacy Act (Canada)*, the *Personal Health Information Protection Act (Ontario)* and the *Integrated Community Health Services Centres Act (Ontario)*.

This Privacy Policy applies to information we collect about you, including without limitation, information about your health, your healthcare providers, and your health number (the “**Personal Health Information**”) and information about your usage of our website (collectively, the “**Information**”). We collect such information when you use our website or otherwise communicate with WH X-Ray.

Wentworth-Halton X-Ray and Ultrasound Inc. is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this Privacy Policy, which outlines how we manage your personal information, and safeguard your privacy. We have also trained our professional, technical and support staff about our policies and practices.

What is Personal Information?

Personal information is any information that identifies you, or by which your identity could be deduced. Personal information includes any health-related information. Business information, however (E.g.: an individual’s business title or business address and business telephone number) is not protected by privacy legislation.

If we do not collect and use your personal information, we cannot provide you with our services.

Accountability

WH X-Ray is committed to maintaining the confidentiality of the Personal Information in its care. WH X-Ray has a Privacy Officer who is accountable for the organization’s compliance with privacy legislation and internal policies. All WH X-Ray employees, radiologists, and affiliates receive privacy training and understand their responsibilities in protecting Personal Information.

Personal Information We Collect and Why:

WH X-ray is committed to protecting your privacy. We collect your Information only by lawful and fair means, and not in an unreasonable or obtrusive way. Wherever possible, we collect your personal information directly from you at your first visit to the facility. We may also collect information from your referring physician.

We may collect information about you, including your name, email address, postal address, phone number, and other information you provide us when interacting with WH X-ray including without limitation, when you:

- request and book an appointment for a Service.
- register for a Service.
- pay the fee for a Service.
- provide booking information on our website.
- provide us with feedback, compliments and complaints.
- request assistance and/or information from us; or
- contact us.

When you use *WH X-ray* website and on-line exam booking application to book appointments, we only collect your first name, last name, telephone number, email address and health card information. This information is used to identify you and contact you in connection with the appointment(s) you book.

The following information is collected when you request an appointment through *WH X-ray* website online booking:

- Name, Gender, Date of Birth and Provincial Health Card Number: Your name, gender and date of birth are collected as identifiers that enable us to accurately identify you.
- E-mail Address: Your e-mail address may be used to send communications, such as appointment confirmations, appointment reminders or notifications about services or exam preparations.
- Phone Number: Your phone number may be used for authentication purposes, for appointment booking services such as appointment confirmations, appointment reminders or notifications about services or exam preparations.

You may also opt to upload your diagnostic imaging requisition to your appointment request so it may be reviewed by our Customer Support Centre and that it is available to *WH X-ray* when you go for your appointment at one of our clinics. We use this information only to provide you with the services identified in the requisition or as further required by your referring physician and/or health-care provider.

Purposes for the Collection, Use and Disclosure of your Personal Information

We collect, use, and disclose personal information for the following purposes:

- To identify and to ensure continuous high-quality service. Use of a service; planning or delivering care or services, including evaluating or monitoring those services.
- To assess your health needs providing the best possible care and assistance.
- To contact you to arrange and confirm appointments and/or to respond to your inquiries.
- To advise your and/or physician with respect to health-related matters, and to render a diagnosis and/or treatment recommendation.
- To enable us to contact and maintain communication with you, including, without limitation, distributing healthcare information.
- To communicate with your physician and/or health-care providers and organizations where required for your health care as part of coordinating care and/or assisting in the provision of care.
- To allow us to efficiently follow-up for testing, treatment, care, and billing.
- For teaching and demonstrating purposes on an anonymous basis (if possible).
- For research, health surveillance and statistical analysis of data purposes.
- To complete submit claims for payment to OHIP and to other third parties (such as private health insurance plans) in order to be paid for services rendered.
- To collect unpaid accounts and to process payments in general.
- To comply with legal and regulatory requirements, including the delivery of patients' charts and records to the College of Physicians and Surgeons of Ontario or others as required under the Integrated Community Health Services Centres Act or the Healing Arts Radiation Protection Act (or successor legislation) in a timely fashion, when required, and to comply with any other agreements/undertakings entered into with regulatory Colleges or the Ministry of Health and Long Term Care.
- For administrative/management activities such as planning resource allocation, reporting, or evaluation.
- By giving us feedback to enable risk management, quality assurance management or activities to improve or maintain the quality of care of *WH X-ray* programs and services and its operations.
- To assist this office to comply with all regulatory requirements and to comply generally with the law.
- Such other purpose or purposes that may be identified before or at the time the information is collected.

We will only collect that information necessary for the purposes set out in this Policy. To the extent that your personal information is to be used or disclosed for a purpose not previously identified, the new purpose will be identified prior to its use or disclosure.

If you are unclear our staff will be able to explain to you the purpose for which the information is being collected at the time of collection.

Disclosing Your Personal Information

By submitting Information to us, you agree that we may use or disclose such Information in accordance with this Policy and as permitted or required by law. Your Personal Information is not disclosed to third parties without your consent, other than as permitted or required by law. If your Information is used for any purpose other than as described above, we will contact you by the e-mail you provided to obtain your consent. *WH X-ray* does not sell, rent, or lease Personal Information.

Service Providers

We may share your Information with your healthcare providers, your emergency contacts, our employees, radiologists, affiliates, contractors, and business partners, to the extent required for them to provide the services you have requested or for the purposes described in this Privacy Policy. We also engage certain trusted third parties to perform functions and provide services to us such as website hosting companies, payment processing companies and other third-party service providers. We may share your Information with these third parties, but only to the extent necessary to perform these functions and provide such services. However, we are **not responsible** for any Information you provide to any service provider.

Consent

This office will seek informed consent for the collection, use, and/or disclosure of your personal information, except where it might be inappropriate to obtain your consent, and subject to some exceptions set out in law. You may provide your consent to us either orally or in writing. Your consent may also be implied through your conduct with us. For instance, your consent will be implied for the collection, use and disclosure of your personal health information for purposes related to your care (including sharing information with your referring physician) if you contact us in person, by phone, or on-line to book an appointment and/or to attend our facility for diagnostic imaging services.

In certain circumstances, as permitted or required by law, we may collect, use, or disclose personal information without your knowledge or consent. These circumstances include (where applicable): where you are unconscious, too sick, or not lucid; where collection or use is clearly in your interests and consent cannot be obtained in a timely fashion; to comply with a subpoena, warrant or court order; or as required or otherwise permitted by law.

Limiting Collection, Use, Disclosure and Retention of Personal Information

The collection or personal information is limited to that which is necessary for the purposes identified in this Policy. Similarly, personal information shall not be used or disclosed for purposes other than those for which the information is collected, except with your express consent, or as required, by law.

- Except where collection, use or disclosure of Information may be justified or permitted or where we are obliged to disclose such information without consent, we will not use or disclose your Personal Information for purposes other than those for which it was collected as set out above. Such circumstances where disclosure is justified, permitted, or required (subject to additional restrictions with respect to Personal Health Information) include situations where:
 - The information is publicly available.
 - It is impossible or impractical to seek consent.
 - It is required to do so to respond to subpoenas, court orders or other legal processes, or to establish or exercise our legal rights or defend against legal claims.
 - We are required by law or by order of a court or tribunal.
 - We believe, upon reasonable grounds, that there is an imminent risk of death or serious bodily; and/or harm to an identifiable person or group.

We retain patient records and films as required by law and regulations, including the regulations under the Integrated Community Health Services Centres Act, 2023 (ICHSCA) (Ontario).

Disposal of Personal Information

WH X-Ray destroys our records in a way that protects patient privacy. This includes electronic records and hardware. We use supervised incineration, supervised shredding and bonded contractors who must adhere to contractual privacy obligations. Before the secure disposal of a health record, we maintain an electronic record of the patient's name and date(s) of services. Retention of patient files is in compliance with the ICHSCA, Bill 60 Your Health Act, 2023. The method of destruction and the person and/or business contracted to be responsible for the destruction is maintained in the business office for ten (10) years.

Updating Your Information

Since we use your personal information to provide health services to you, we will use our reasonable best efforts to ensure that the information is as accurate, complete, and up to date as necessary for the purposes that it is to be used. Please inform us immediately if any of your personal information changes, so that we can make any necessary changes.

Is My Personal Information Secure?

WH X-Ray takes all reasonable precautions to ensure that your personal information is kept safe from loss, theft, unauthorized access, modification, use, copying, disclosure, or tampering. Your information is protected whether recorded on paper or electronically.

We have safeguards in place to protect all personal information retained in our facility, and during their disposal and destruction. Our safeguards include:

- Physical measures (locked filing cabinets, restricting access to our office, alarm systems).
- Technological tools (passwords, encryption, firewalls, anonymizing software).
- Organizational controls (security clearances, limiting access on a “need-to-know” basis, staff training, confidentiality agreement, privacy audits).

We will take reasonable steps based on the circumstances to ensure that Personal Health Information in our control is protected from theft, loss and unauthorized use or disclosure. We will endeavour to notify you if your Personal Health Information is stolen, lost, or accessed by an unauthorized person.

The facility’s staff is also aware of the importance of maintaining the security and confidentiality of all personal information in our possession. We review and update our security measures on a regular basis.

Access to, and Accuracy of, you Personal Information

You may ask for access to any personal information we hold about you upon written request and with reasonable notice. We will also advise you whether we hold personal information about you, how the information has been used, and to whom it has been disclosed, upon written request and with reasonable notice (with only a few exceptions). If it is not possible to provide you with a specific list of third-party disclosures, we will provide you with a list of probable third-party disclosures.

Summary information is available on request. More detailed requests may be subject to a reasonable fee for photocopying, converting information to an alternate format (if applicable) and staff time. We will advise you of the approximate costs before processing your request. We will respond to your request within a reasonable time period, and we will try to be as specific as possible.

Can I be Denied Access to My Personal Information?

Your rights to access your personal information are not absolute. Subject to the requirements of PHIPA, access may be denied for several different reasons, including:

- If doing so would likely reveal information about another individual unless the other individual’s information is severable or the other individual third party has consent.
- If doing so could reasonably be expected to threaten the life or security of another individual unless the third-party information is severable.
- If the information is protected by solicitor-client privilege.
- If doing so would reveal confidential commercial information.

If we deny your request for access to your personal information, we shall provide you with the reasoning why. For any requests for correction of your Personal Health Information, we will respond to you within the timeframe required by PHIPA.

Correcting Errors

If we hold personal information about you and you believe that it is not accurate, complete and up to date, you can request to have it amended. This applies to information and not to professional opinions we or other health care professions may have formed. We will investigate and respond to your request. If we discover that the information is not accurate, complete, and up to date, we will take reasonable steps to correct it. We will also send any information that has been amended, where appropriate, to any third parties that have access to the information. If we refuse a request to correct information, we shall explain why, and we will make a note of this in your file (and forward such note to anyone else who receive the earlier information).

Third-Party Links

Our website contains links to other websites and certain features of our website may be provided by third party suppliers. You agree to abide by the third parties’ security and privacy policies when using these links or features. The third-party sites are not under our control, and we are not responsible for the content or practices. The inclusion of a link to a third-party website on our website should not be as our endorsement of such website.

Changes to This Privacy Policy

It is our practice to review our policies and procedures from time-to-time and, therefore, we may amend our Privacy Policy in the future.

Requests for Access

If you have any privacy questions or concerns, or wish to access your personal information, please contact our Privacy Information Officer at:

Wentworth-Halton X-Ray and Ultrasound Inc.
Business Office, 1 Young Street, Suite 218
Hamilton ON L8N 1T8
Phone: 905.572.6868 Facsimile: 905.572.6860
privacy@whxray.com

Wentworth-Halton Privacy Information Officer: Dr. Michael Di Ianni

We take your concerns seriously and will do everything necessary to respond to you without undue delay. If you are not satisfied with our response, the Privacy Commissioner of Canada and/or the Information and Privacy Commissioner of Ontario can be reached at:

Privacy Commissioner of Canada
112 Kent Street
Ottawa ON K1A 1H3
1.800.282.1376
[file a formal complaint](#)

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto, ON M4W 1A8
1-800-387-0073
info@ipc.on.ca