



PRIVACY POLICY

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Purpose and Scope

At arc Health we are committed to protecting the privacy, accuracy and reliability of any personal information we receive and to safeguarding such information from unauthorized access, alteration and disclosure. This privacy policy addresses our data collection, use and disclosure practices. At all times we will meet or exceed legislated requirements for privacy and confidentiality in the regions we operate in.

This policy document defines common privacy requirements for all personnel and processes that require the transfer of personal information. This policy also applies to information resources owned by others, such as contractors of arc Health, entities in the private sector, in cases where arc Health has a legal, contractual or fiduciary duty to protect said resources while in arc Health custody.

1 Consent

1.1 Obtaining Informed Consent

1.1.1 The first step to working with any individual on a claim is to obtain informed consent. This is obtained through a physical form that must be signed and dated by the individual agreeing to release the personal health information to arc Health for the stated purpose.

1.2 Exceptions to Consent Principle

1.2.1 We may **disclose** personal information without your knowledge or consent only in the event that there is imminent risk of harm to the individual or others, or if it is required by law.

2 Collection of Personal & Business Information

2.1 Collection

2.1.1 arc Health manages absence, disability and workplace health for employers. In order to provide this service we must collect and maintain personal and business information. With consent, we collect the following information: name, gender, full mailing address, email address, phone numbers, and contact name. We also collect health information from you and your care providers. All collection, use and/or storage of any personal information is done in accordance with applicable provincial and federal privacy legislation.

2.2 Limiting Use, Disclosure and Retention

2.2.1 We understand it is our responsibility to not collect personal information indiscriminately or mislead individuals about the reasons for collecting personal information.

2.2.2 To control the collection of information, we have appropriate forms for specific claim types. Employees of arc Health are able to explain to clients why this information is required.

3 Use of Personal & Business Information

3.1 Purpose of Information

3.1.1 arc Health uses personal information for three general purposes.

- 3.1.2 We use the information to provide our customer (the employer) with advice regarding whether an absence is medically valid.
- 3.1.3 We use the information to contact clients for the purpose of managing their application for benefits and making plans for recovery and return to work.
- 3.1.4 We may use this information in aggregate form to provide reports to our customer. Only non-identifying data is provided.

3.2 Use of Information

- 3.2.1 We understand that information is used only for the purposes for which it was collected, and further consent must be obtained if used otherwise.

4 Disclosure of Personal Information

4.1 Disclosure

- 4.1.1 Except as required for the performance of services, or as required by law or legal process, we will not disclose any of the personal information provided by our client, whether an individual or employer.

5 Accuracy

- 5.1 We accept responsibility in keeping all personal information accurate and up-to-date. Maintenance of accurate information is integral to ensure our ability to provide necessary interventions and appropriate services. We comply with any request to make accurate or update personal information when necessary.

6 Safeguarding Your Personal Information

6.1 Protecting Information

- 6.1.1 We take all reasonable measures to protect your personal information. Only authorized employees are permitted to access your personal information, and they only may do so for permitted functions. Any employee who violates our privacy access policies will be subject to disciplinary action, including termination when appropriate.

6.2 Security Measures

- 6.2.1 arc Health protects information physically, organizationally, and technologically. There are building security measures in place and physical barriers to access information. At an organizational level, we have policies and procedures in place. We also ensure privacy through the use of a secure IT system that is password protected on various levels. Information is kept confidential and protected from alteration and unauthorized access.

7 Accessing or Deleting Your Personal Information

7.1 Accessing Information

- 7.1.1 If you have submitted personal information to arc Health and you would like to access that information, you can email us at contact@archealth.ca.

7.2 Deleting Information

- 7.2.1 To prevent breach of privacy, any information whose purpose has been fulfilled is permanently deleted from our system. Hard copies are shredded by a professional document management company.

8 Terms, Changes and Questions

8.1 Terms

- 8.1.1 Participating in the services arc Health provides is voluntary, and signifies your agreement to the terms of our privacy policy. If you do not agree with these terms, please do not use our services and contact your employer.

8.2 Changes and Questions

- 8.2.1 If you have any questions or comments about this policy or our use of personal information, please contact us at contact@arhealth.ca or 905-274-1920. We will use all reasonable efforts to promptly investigate any complaint you may have regarding our use of personal information.

9 Openness

9.1 Employee Access

- 9.1.1 Customers, clients, and employees of arc Health are aware of the policies and practices in place for the management of personal information and how to access these policies and practices.

10 Policy Compliance

10.1 Employee Non-Compliance

- 10.1.1 An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment

11 Recourse and Complaints

11.1 Complaint Procedure

- 11.1.1 Our President is our Chief Privacy Officer. Any complaints to arc Health are received, acknowledged, and addressed. The appropriate senior management staff is assigned to the matter and policy amendments and procedures are modified if required.