



PRIVACY POLICY

Accountability

Privacy of your personal information is an important part of our office providing you with quality medical records duplication services. At RECORDS MANAGEMENT LTD, we prioritize above all else our accountability as applies to the collection and management of personal health management. We understand the importance of protecting your personal information. We hold all of our employees accountable for meeting privacy, security, and confidentiality obligations on a daily basis, and maintain accountability policies that are in keeping with the spirit and intent of the Personal Health Information Protection Act, 2004 (PHIPA). Staff members who do not adhere to these data protection policies face serious consequences at RECORDS MANAGEMENT LTD. Our company maintains a commitment to integrity in how we collect, use, and disclose personal information. We handle anyone's data as rigorously as we would our own. This level of integrity extends to all health, financial, and personal data, whether analog or digital. It is important to provide this service to our patients.

Identity Verification

RECORDS MANAGEMENT LTD limits itself to the collection of personal health data directly related to client and patient services. At no time does RECORDS MANAGEMENT LTD use health information when verifying someone's identity. Personal information is the only data used to verify the identity of a patient. In scenarios where no other identification alternatives exist, health information is used **only** with the consent of all parties.

Obtaining Consent

RECORDS MANAGEMENT LTD at times serves as supplier to health care custodians. In these scenarios, we always obtain these clients' consent when collecting, using, or disclosing their patients' personal health information. A client's existing standards and policies serve as the default policy materials regarding the collection and disclosure of personal health information; in scenarios in which such policies do not exist, RECORDS MANAGEMENT LTD then defaults to standards and policies outlined by the Personal

Health Information Protection Act of 2004. Patient data is regarded as confidential by RECORDS MANAGEMENT LTD and kept in a secure environment. When it is necessary to limit liability or risk, RECORDS MANAGEMENT LTD will destroy or delete patient data.

RECORDS MANAGEMENT LTD also at times serves as a custodian of patient health data for physicians and private practices. In these scenarios, RECORDS MANAGEMENT LTD's policy is to make a good faith attempt to get patient consent from any patient over the age of 16 before releasing personal health data. In emergency scenarios during which there is not sufficient time to obtain consent, RECORDS MANAGEMENT LTD's policy is to act in support of the medical care of a patient and to obtain consent as soon as is reasonably possible thereafter. Patient data in these scenarios as in all others is regarded as confidential by RECORDS MANAGEMENT LTD and kept in a secure environment. When it is necessary to limit liability or risk, RECORDS MANAGEMENT LTD will destroy or delete patient data.

Limiting Collection

Our office understands the importance of protecting your personal information. To help you understand how we are doing that, we have outlined how our office is using and disclosing your information.

RECORDS MANAGEMENT LTD limits itself to the collection of personal and health data as it applies to the aiding and enabling of a patient's provision of care. The company also collects information to facilitate administrative and reporting obligations in healthcare. All information is collected for legal and authorized purposes, and all methods used are fair and lawful. RECORDS MANAGEMENT LTD never leverages coercion in the pursuit of consent for collecting, using, or disclosing data. All patient information accessed by RECORDS MANAGEMENT LTD to enable a patient's provision of care is done so under the requirements of PHIPA or another Act.

All visitors to the RECORDS MANAGEMENT LTD website are anonymous and do not need to disclose personal information. Any information received via our website is used solely for the purposes of communicating with our users regarding services, products, and special offers. RECORDS MANAGEMENT LTD does collect limited personal data from site users wishing to maintain premium services. Any information obtained is not shared with third parties unless it is required to complete a service request.

Limiting Disclosure

RECORDS MANAGEMENT LTD discloses personal health information in keeping with the original purpose or intent for which it has been collected and with consent as

permitted or required by law. The permission or requirement of disclosure extends to the following:

- The patient
- The patient's legal guardian or substitute decision maker
- Law enforcement officers in possession of a warrant or subpoena, or in aid of an investigation
- Child protection authorities, where child abuse is suspected, or a child's lawyer
- Public guardians or trustees
- The Coroner

When unusual requests are received, we will contact you for permission to release such information. We may also advise you if such a release is inappropriate.

The Retention of Records

RECORDS MANAGEMENT LTD maintains all health records to the best of its ability for the duration of a client's contract.

Any information not directly related to personal health is retained only as long as it is required. Destruction of this information is done in accordance with the company's Record Retention policies. Any hard copies of data are destroyed through the use of cross-cut shredders.

The Accuracy of Information

RECORDS MANAGEMENT LTD takes all reasonable measures to ensure the accuracy of personal and health information through comprehensive and thorough quality control processes and maintains complete and up-to-date records as provided to us by the health care provider, and as needed for the original purpose of collection and duplication of the records.

Data Protection

RECORDS MANAGEMENT LTD has several safeguards in place that effectively protect patient data from theft, loss, unauthorized access, disclosure or use, modification, replication, or disposal. These include physical, technical, and administrative safeguards that both protect information and ensure that it is available. Data protection methods used by RECORDS MANAGEMENT LTD include:

- Proactively identifying incursion risks and mitigating those risks
- Maintaining intrusion detection systems and firewalls
- Leveraging anti-virus and anti-spyware software
- Limiting access to authorized users and logging all access

- Running regular audits of access
- Maintaining complex passwords and supporting system-initiated password changes
- Utilizing two-factor authentication
- Leveraging the latest encryption and data transmission technology
- 24/7 monitoring & security

RECORDS MANAGEMENT LTD also maintains safe and consistent records destruction policy, personal accountability amongst the staff, and extensive privacy and data protection training for employees. All employees of RECORDS MANAGEMENT LTD sign confidentiality agreements. RECORDS MANAGEMENT LTD also maintains confidentiality and data security clauses in all agreements drafted with contractors, vendors, and other service providers.

Transparency

RECORDS MANAGEMENT LTD maintains a policy of transparency when it comes to our privacy and information protection practices. Any details regarding the security measures taken in pursuit of data protection, however, are exempt from this and carefully guarded in order not to compromise any security systems.

Right of Access and Correction for Individuals

Barring a provision of PHIPA that states otherwise, individuals with personal health information in the care of RECORDS MANAGEMENT LTD have a right to access their records. The responsibility of coordinating all requests for copies of a health record lies with the Patient services representatives. Information collected by RECORDS MANAGEMENT LTD for day forward scanning does not fall into this category. Any individual who wants access to this information must request access via their healthcare provider. RECORDS MANAGEMENT LTD is prohibited from releasing this information directly to any party other than the client and only retains the information for the time period required for a client to perform a quality assessment. After an assessment, RECORDS MANAGEMENT LTD will destroy the information in keeping with our Records Destruction policy.