



## PRIVACY POLICY

In the course of providing its client assessment, treatment, care, research and administrative functions, Monarch House (“we”, “us”, “our”) may process personal information (PI) and personal health information (PHI) relating to its clients and families within our custody and control. Monarch House values privacy and is firmly committed to protecting the privacy, confidentiality and security of PI and PHI and other confidential information that is collected, used, disclosed and retained under our custody and control. Monarch House is committed to collecting, using, and disclosing PI and PHI responsibly and only to the extent necessary for the services we provide. In this Privacy Policy, personally identifiable information about you will be referred to as “Personal Information” or PI.

Monarch House’s obligations regarding PHI and PI are outlined in the following provincial legislation: the Ontario Personal Health Information Protection Act, 2004, the Alberta Personal Information Protection Act, the British Columbia Personal Information Protection Act and federally under The Personal Information Protection and Electronic Documents Act (PIPEDA), respectively. Regulated health professionals may have additional privacy obligations as set out by their professional college.

This policy applies to all Monarch House staff, vendors, contractors, consultants, agents and related entities who, on behalf of or for the purposes for or benefit of Monarch House, collect, use, disclose or have access to PI and/or PHI, which is in the custody or control of Monarch House. This is consistent with and supplementary to any applicable professional codes or conduct or codes of ethics. Managers are accountable for ensuring staff receive proper training on this and other privacy-related policies and how to apply these policies in their day-to-day work.

### Identifying Purposes for Collection

Monarch House, at or before the time PI/PHI is collected, will identify the purposes for which it collects information with express consent.

In general, we may collect use and disclose your PI for the purposes of assessment, planning, treatment or delivering care or other health-related services.

We may collect, use or disclose PI as set out below and as otherwise required or permitted by law. For example, we may collect your name, gender, date of birth, address, email address, phone number, payment card information, call recordings, general health concerns, physician, diagnosis, referrals, treatment plans and other relevant information as required. Personal





Information may be collected, used and disclosed before, during and after your visit to Monarch House.

We may collect PI from you directly or from other third parties if you provide us with consent to do so or if we are authorized to do so by law. We will only collect the PI we need to provide you with health care services.

In the course of providing health care services, your PI may be shared with health care professionals involved in your care (e.g. another physician or health care practitioner, an allied professional or member of your clinical care team) or with referral sources unless instructed otherwise by you.

We may also share your PI for the purposes of contacting your family or a potential substitute decision maker.

**Consent for Collection, Use and Disclosure:**

The consent of the client, parent/guardian or substitute decision-maker is required for the collection, use or disclosure of their PI/PHI, except where it may be inappropriate to seek consent due to legal, medical or security reasons. If you do not wish your personal health information to be used or shared, you have the right to refuse to provide all or part of the information to us at the time we request the information or anytime afterwards.





We may not be able to fulfill your wishes if they impact our ability to deliver quality health care to you or if we are legislated to use or disclose the information to which you object. In these cases we will discuss the impact of your objection with you.

If we find it necessary to disclose your information for purposes other than providing health care, we will notify you of the purpose for the disclosure and ask you for consent to disclose the information.

The way we collect your consent may vary depending on the purpose for the consent.

**Payment:** We may collect, use and disclose your personal information for the purposes of facilitating and/or collecting payment for our services or to determine any entitlement to funding coverage or other benefits.

**Research:** Monarch House may conduct or participate in research and analysis in which case your personal information, including personal health information, may be analyzed in de-identified form. The results of this research and analysis will not be disclosed or otherwise published in a manner that could identify an individual. Any additional testing for research or analysis purposes that involves the collection, use or disclosure of information that could identify an individual will involve a separate informed consent process.

**Internal Operations:** We may collect, use and disclose personal information for the purposes of risk management, security or otherwise to improve the quality of Monarch House services, including the evaluation and monitoring of those services. For example, we may record phone calls for training, documentation and quality assurance purposes. We may also conduct video recording for security purposes via the use of cameras located in public areas of some of our clinics such as reception, clinic entrance and exit locations and in shared hallways in buildings in which we are located.

**Legal & Compliance:** We may disclose your personal information where required or permitted by law. For example, we may provide your personal information in response to a search warrant or other legally valid inquiry or order. We may also disclose personal information for certain proceedings and to investigate or prevent actual or suspected loss or harm to persons or property.

We may transfer any information we have about you in connection with a proposed or completed merger or sale involving all or part of Monarch House or as part of a corporate reorganization or other change in corporate control.





### **Limiting Collection, Use, Disclosure and Retention**

Monarch House will only collect PI/PHI by fair and lawful means and (i) limit its collection of PI/PHI to that which is necessary for a lawful purpose identified by Monarch House; (ii) not collect more PI/PHI than is reasonably necessary for the purpose; and (iii) will not collect PI/PHI if non-identifying information will serve the purpose.

Similarly, Monarch House will not process, retain or disclose PI/PHI for purposes other than those for which it was collected, except with consent or as required by law. Monarch House will: (i) limit its use, disclosure and retention of PI/PHI to that which is necessary for a lawful purpose identified by Monarch House; (ii) not use, disclose and retain more PI/PHI than is reasonably necessary for the purpose; and (iii) not use, disclose and retain PI/PHI if non-identifying information will serve the purpose. Monarch House staff are accountable for ensuring sensitive information is only used and disclosed for authorized purposes and to authorized individuals. Staff may not use (i.e., access, view, handle) PI/PHI unless they have a legitimate clinical or business “need to know” directly related to their role and responsibilities at Monarch House.

### **Storage of Personal Information**

We may use service providers to perform certain services on our behalf, such as data hosting and processing. For example, we may use service providers to store our data, authorize and process payments, provide services, record telephone calls, and send email communications. Some of these service providers may be located outside of Canada, including in the United States. As a result, your personal information may be processed and stored outside of Canada for the purposes described in this privacy policy. While outside of Canada, personal information will be subject to applicable foreign laws, which may allow government and national security agencies to access personal information in certain circumstances. When we transfer personal information, we take reasonable steps to ensure that your personal information is protected from loss, theft or unauthorized access, use, modification and disclosure.

### **Accuracy**

Monarch House will take reasonable steps to ensure PI/PHI in our control is accurate, complete, and up to date as necessary for the purposes for which it is to be used or disclosed. The extent to which PHI is required to be accurate and up to date depends on the purposes of the information. Monarch House does not undertake efforts to update PHI unless such a process is necessary to fulfill the purposes for which the information was collected.

### **Safeguards**





Monarch House believes that securing your personal information is a very important part of our job. We have implemented reasonable administrative, technical and physical safeguards in an effort to protect against loss, theft or unauthorized access, use, copying, modification, disclosure and disposal of personal information in our custody. Monarch House will protect PI/PHI regardless of the format in which it is held.

In some cases we may share your personal health information with third parties such as vendors, suppliers or providers responsible for administering our programs. These organizations must sign a contract with us to follow privacy and health information practices that are the same as or similar to our own.

Staff are required to report privacy incidents to their Manager and/or Director. Incidents may include suspected or actual breach of privacy laws, internal privacy policies, or contractual obligations.

### **Openness about Information Policies and Practices**

Monarch House will make readily available to individuals specific information about its information management policies and practices. Monarch House does this through its written Privacy Policy available to the public. New Monarch House staff will be made aware of and subject to this policy during their orientation.

### **Access**

You may ask to see your health record or make a formal written request to see and/or obtain a copy of your health record. We will endeavour to respond to a formal access request within 30 days. If necessary, we will provide written notice of the reason for any time extension and the length of the extension.

We may deny or restrict your access to your health record in very limited circumstances (e.g., if it is reasonable to believe the disclosure would result in a risk of serious harm to you or another person, or if a provincial or federal act prohibits disclosure).





### **Challenging Compliance – Correction Rights**

If you believe your health record to be inaccurate or incomplete, you may request that the record be corrected. We will make the correction if you demonstrate that the information is inaccurate or incomplete for the purposes for which the information is being used. We may not correct the record if it was not originally created at Monarch House and we do not have sufficient knowledge, expertise or authority to correct it; or if the record consists of a professional opinion or observation made in good faith about you. We will, however, note the request for correction and the fact that we did not make any changes based on one of these reasons in the record.

We will provide written notice to third parties who received the incorrect information about the correction, to the extent reasonably possible and if the correction could reasonably be expected to have an impact on your ongoing health care or benefits.

### **Changes to our privacy practices and this Privacy Policy**

Monarch House reserves the right to modify or amend this Privacy Policy at any time and for any reason. We will also update this Privacy Policy and our privacy practices to comply with federal and provincial privacy legislation as they may each apply. You may request a copy of the Privacy Policy currently in effect at any time by contacting us. This Privacy Policy was last modified on April 10, 2025.

### **Questions or Comments**

If you wish for more information, access to your records or you believe that your privacy rights have not been followed as required by law or as explained in this Privacy Policy, you may contact us at: [privacy@monarchhouse.ca](mailto:privacy@monarchhouse.ca)

