

*As a provider of disability management services and Independent Medical Evaluations the collection and use of personal information and personal health information (PHI) is fundamental to our business. We take every precaution to ensure that personal information and PHI is protected in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) as well as the Personal Health Information Protection Act (PHIPA).*

D&D Disability Management Services has established a company policy in accordance with legislative requirements to govern the actions of all employees and independent contractors as they relate to the collection, use, retention and disclosure of personal information. All employees and independent contractors as a part of their contracts with D&D Disability Management are bound by a signed Confidentiality Agreement and/or their affiliated collage to: (a) maintain our customers and/or clients confidentiality; (b) not use the information for any unauthorized purpose and (c) abide by our commitment to privacy.

## PRIVACY POLICY

We are committed to providing quality service. Our privacy policy applies to our customers, clients, employees and independent contractors. It consists of the following key principles:

**1. Accountability:** All employees of D&D Disability Management are educated regarding privacy procedures that must be taken to safeguard customer and/or client information. The privacy policy is posted at our reception area and website making it readily available to all patrons.

The responsibility of our company's privacy process belongs to our president who is responsible for the development and implementation. Procedures and security measures are audited regularly to ensure that they are being properly administered in accordance with PIPEDA, and that they remain effective and appropriate.

**2. Identifying Purposes:** D&D Disability uses the information it collects to:

- a. Provide independent medical assessments; and

Create statistical analyses for strategic planning and service level agreement (SLA) monitoring. This data is compiled in such a way that individuals cannot be identified from the information prior to, or at the time, personal information / personal health information is collected, the reason for collecting it is identified and explained. In the event that we require additional information, we take every measure to ensure that our

clients/claimants are aware of the source that information is obtained from, as well as, identify the reason and purpose the new information requested.

**3. Consent:** Prior to the commencement of every assessment each client/claimant are required to provide consent for the collection, review, use and disclosure to the specific identified parties by signed a consent form. We recognize and respect a claimant's right to contest the parameters of the consent process. In the case of individuals with limited English proficiency, we engage the services of a third party, unbiased interpreter to explain the process in the claimant's native language to ensure he/she fully comprehends the nature of the document being signed.

**4. Limiting Collection:** Only the personal Information and personal health information required for the purposes of conducting an assessment, or other services that D&D Disability Management may provide will be collected. Collection is completed by fair and lawful means.

**5. Limiting Use:** Disclosure and Retention of Personal Health information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Only those individuals requiring access to the information in order to perform their operational duties are granted access.

Personal Health information shall be retained for ten (10) years from the last assessment date in accordance with good record keeping as outlined by the College of Physicians and Surgeons of Ontario (CPSO) unless otherwise dictated by law.

**6. Accuracy:** D&D Disability Management makes every reasonable effort to keep all personal information accurate, complete and up to date as is necessary.

**7. Safeguards:** We will protect personal information with appropriate safeguards and the highest standards of security measures. Our premises are secured by a security system. During hours of operation a D&D Disability Management employee is stationed at the reception desk located at the entrance of our office. It is the duty of this employee to ensure that all individuals visiting our office are identified prior to allowing them access to areas outside of reception.

D&D Disability Management has implemented a paperless office environment which minimizes the amount of information contained in hardcopy file copies. Any existing hard files are stored at our central administration office in a fire rated locked cabinet.

Information is stored electronically in our central administration office within a secure environment and is subject to access controls that include personalized, confidential usernames and passwords that ensure we can track who is accessing/updating information and when that access has occurred. We employ the use of roles to limit accessibility of data to those who require it to complete their daily job tasks and protect data from unauthorized access.

Electronic information is transmitted and shared with authorized parties in a secure manner. SSL, encryption technology as well as secured VPNs and web portals are employed. The company firewall uses a two-factor authentication system for all external connections. We do not offer public connections.

**8. Openness:** Our privacy policy is available to the public. It is posted at our reception desk and website so that it is available to all patrons. Additional copies of the policy can be provided upon request.

**9. Individual Access:** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. This request will be subject to a processing fee which will be determined at the time of the request. We recognize that an individual has the right to challenge the accuracy and completeness of the information we maintain. D&D will endeavour to amend incorrect or missing information as appropriate.

**10. Challenging Compliance:** Individuals have the right to challenge D&D Disability Management's compliance the above fair information principles by contacting the following:

Lou D'Angelo  
President/Privacy Officer  
D&D Disability Management Inc.  
4 Director Court, Suite 105  
Vaughan, Ontario, L4L 3Z5  
Tel: 416-633-8124

Email: [lou.dangelo@dddisability.com](mailto:lou.dangelo@dddisability.com)