

## **SCOTIACARE HOMECARE & CAREGIVERS INC. - PRIVACY POLICY STATEMENT**

ScotiaCare Homecare & Caregivers Inc. (referred to as “ScotiaCare”) is committed to keeping the personal information of its clients accurate, confidential, secure and private. Our Privacy Policy has been designed to inform employees, clients, and third parties of ScotiaCare of our commitment and recognition to our obligation to meet the spirit and terms of the federal Personal Information Protection and Electronic Documents Act (PIPEDA).

Our Privacy Policy describes the principles by which ScotiaCare protects the privacy of personal information in its possession. It addresses the reasons why such information is collected, how it is used, how its confidentiality is protected and outlines the clients’ rights in respect of this information. Our Privacy Policy incorporates and expands on the 10 principles for the protection of personal information, as devised by the Canadian Standards Association.

The Privacy Policy applies to personal information about the clients of ScotiaCare and other individuals that is collected, used or disclosed by ScotiaCare. This Privacy Policy does not apply to information about corporate clients and does not apply to information about the employees of ScotiaCare. ScotiaCare does, however, protect the confidentiality of such information in accordance with the law and our own policies.

### **Personal Information Protection Principles**

#### **1. Accountability**

ScotiaCare is accountable for the protection of all personal information within the organization's possession or control, including any personal information that has been transferred to a third party for regulatory, legal or processing purposes. ScotiaCare will require a comparable level of protection of this information from its third party relations. ScotiaCare has established a Privacy Office, which has overall responsibility for our protection of personal information and for ScotiaCare’s compliance with this Privacy Policy.

#### **2. Identifying Purposes**

Personal information that ScotiaCare collects from clients includes:

- The client’s name and address and other contact information, such as telephone numbers, email address;
- Services provided, both historic and current;
- Information about a client’s transactions with us, such as rates, hours, account balances, payment history;
- Credit and reference information, such as date of birth, employment information, drivers license, previous addresses, and general financial information;
- Medical information to be used in case of emergency power outages; and,
- Bank information for pre-authorized payments.

When an individual applies for service, ScotiaCare will make the individual aware of the purposes for which ScotiaCare is requesting the personal information. If ScotiaCare identifies other purposes for which the personal information may be used, ScotiaCare will seek the individual's consent prior to such use. ScotiaCare will advise that it is the individual's right to refuse permission for ScotiaCare to use personal information for any new purposes.

Additional purposes for collecting personal information may be identified to an individual before or at the time of collection. However, at a minimum, ScotiaCare will collect personal information for the following purposes:

- To verify the client’s identity;
- To determine the client’s eligibility for services;
- To provide the client with care and to bill the client for that service;
- To assist us in updating the client’s creditworthiness and the collection of accounts;
- For pre-authorized payments for services;
- To respond to the client’s inquiries about appropriate levels of care;
- To prevent fraud with respect to both the client and our company; and,
- To meet legal, regulatory and settlement requirements.

#### **3. Consent**

The knowledge and consent of an individual are generally required for the collection, use or disclosure of personal information and ScotiaCare will seek to obtain consent before or when it

collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly or implicitly. However, ScotiaCare will collect, use or disclose personal information without an individual's knowledge and consent only in limited circumstances and as permitted by law, such as in the case of an emergency where the life, health or security of an individual is threatened. Subject to certain legal and contractual restrictions and reasonable notice, an individual can refuse or withdraw their consent to the collection, use or disclosure of personal information about them at any time. All existing clients will be informed of what types of personal information have been collected, the purpose for the collection and the procedures available for contacting ScotiaCare with any inquiries. All new clients will be provided with a consent form and an accompanying explanation about the collection, use and disclosure of their personal information when requesting service.

#### 4. Limiting Collection

ScotiaCare limits the amount and type of personal information it collects to that which is necessary for the business of the service provider and as permitted by law. Personal Information will be collected using procedures that are fair, transparent and lawful.

#### 5. Limiting Use, Disclosure and Retention

ScotiaCare will only use the personal information for the purpose for which it was collected as identified in principle #2, unless consent is given by the individual to use or disclose it for another purpose or as is required by law. ScotiaCare will develop explicit retention periods for closed accounts, after which the personal information will be destroyed or made anonymous. Under certain exceptional circumstances, ScotiaCare may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

#### 6. Accuracy

ScotiaCare shall take all reasonable steps to ensure that all personal information will be kept accurate, complete and up to date. Individuals may challenge the accuracy and completeness of personal information about them and have it amended, as appropriate.

#### 7. Safeguards

In executing its responsibilities with respect to the confidentiality of personal information, ScotiaCare will employ a number of safeguards, appropriate to the sensitivity of the information, to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to offices, security clearances, limiting access on a "need to know" basis and the use of passwords and encryption. Procedures for implementing these measures will be communicated to all employees and third parties to ensure compliance with this principle.

#### 8. Openness

ScotiaCare will make its policies and practices relating to the protection of personal information available to its clients. ScotiaCare will keep its clients informed of these policies and practices and clients shall be provided access to all related policies and procedures via ScotiaCare's web page and bill inserts. The information will be available in a format that is easy to understand.

#### 9. Individual Access

Any client of ScotiaCare can have access to the personal information about them that ScotiaCare has in its possession or control. Any client may request that their personal information be amended for purposes of accuracy and completeness. Clients can make their requests by telephone (902-827-5599), via email ([privacy@scotiaca.com](mailto:privacy@scotiaca.com)) or in writing (644 Portland Street, Suite 332, Dartmouth NS B2W 6A3, Attention: Privacy Officer). Response to an individual's request will be made in a timely and efficient manner.

#### 10. Challenging Compliance

Any client of ScotiaCare may challenge ScotiaCare's compliance with this Privacy Policy by contacting ScotiaCare directly. ScotiaCare has policies and procedures to receive, investigate and respond to individuals' complaints and questions.