

Dental Hygiene Practitioners of Ontario

Personal Information Policy



INTRODUCTION

The DHPO is committed to respecting the privacy rights of all individuals, including DHPO members and employees, by ensuring that their personal information is collected, used and disclosed in an appropriate manner.

The Personal Information Protection and Electronic Documents Act (“PIPEDA”) is federal legislation that came into effect on January 1, 2001. In the absence of corresponding provincial legislation, PIPEDA will apply to DHPO effective January 1, 2004. This personal information policy may be amended if provincial privacy legislation is enacted in the future, to ensure that this policy conforms to such legislation.

DHPO collects personal information about its members for purposes of effectively communicating with, and providing services to, its members. DHPO also collects personal information about its employees for purposes of personnel management and administration.

The principals established in the personal information policy of DHPO correspond to the principles set out in the Canadian Standard Association’s Model Code for the protection of personal information, and conform to the requirements with PIPEDA.

POLICIES

1. Accountability

DHPO is responsible for all personal information under its control. The board of directors designate an individual who will be accountable for compliance with the personal information policy and procedures of DHPO. The individual appointed to be accountable for DHPO’s compliance will be known as the “Privacy Officer”. The Executive Director of DHPO shall be the Privacy Officer.

DHPO is committed to protecting personal information, and accordingly will include an appropriate level of protection in contractual arrangements with third parties (or obtain appropriate assurances from third parties) who receive personal information from DHPO.

DHPO will ensure that its members, employees and other interested individuals have the opportunity to review and update their personal information on file with DHPO. All such persons will be advised that questions and concerns can be directed to the Privacy Officer.

2. Identifying the Purposes for Collection of Personal Information

DHPO will identify the purposes for which it collects personal information at or before the time the information is collected. Written notification of such purposes will be used when it is feasible to do so, but DHPO may elect to identify such purposes verbally.

Common purposes for the collection of personal information include:

- i. Enabling a dental hygienist to make application to become a member of DHPO.
- ii. Enabling an existing member to renew his or her membership with DHPO.
- iii. Enabling DHPO to communicate effectively with its members and to provide services to its members - including, but not limited to:
 - a. information related to benefits, products, services, professional development and employment opportunities;
 - b. mailings by third parties;
 - c. contacts for members of the public seeking dental hygiene services; and
 - d. lists of members to provincial dental hygiene societies.
- iv. Enabling DHPO to recruit new members, or to communicate with former members.
- v. Enabling DHPO to draw upon members with the skill set or identified interests for assistance or input.
- vi. Enabling DHPO to effectively provide a liaison between members and provincial dental hygiene societies.
- vii. Enabling DHPO to respond to requests for speakers, community outreach and access to dental hygiene services.
- viii. Enabling DHPO to respond to requests for statistical data about members related to health human resources, skill sets, and identified interests.

DHPO will identify additional purposes that arise for the collection of personal information. DHPO will communicate such additional purposes to its members and interested individuals, if it is appropriate in the circumstances to explain the purpose for which the personal information is collected.

3. Consent

DHPO will obtain the consent from individuals for the collection, use or disclosure of their personal information. DHPO will make every effort to obtain the express consent from an individual, although there may be circumstances where DHPO will determine that consent has been implied by an individual. Express consent must be in writing; implied consent will not be in writing, but the circumstances relating to the provision of implied consent shall be such that a reasonable person would conclude that the individual has consented to the collection, use or disclosure of his or her personal information.

There may be situations where consent is given verbally, either in person or over the telephone. If DHPO obtains verbal consent from a member or employee, a note of that consent must be included in the file of the member or employee providing such verbal consent.

DHPO shall include on the membership application and renewal form an express statement that the individual signing the form is consenting to the collection, use and disclosure of his or her personal information. It is recognized that there will be situations where the applicant, or the member renewing his or her membership, fails to execute the form as evidence of his or her consent. If the form is otherwise properly completed, DHPO may imply the consent of the individual to the collection, use and disclosure of his or her personal information.

The consent of an individual may be withdrawn at any time. DHPO generally requires such withdrawal to be in writing, but will recognize verbal communication of withdrawal of consent when it is appropriate to do so in the circumstances.

4. Limitations on the Collection of Personal Information

DHPO will only collect personal information that is necessary for the purposes that have been identified. Personal information will not be collected for unspecified or improper purposes.

5. Limitation on the Use, Disclosure and Retention of Personal Information

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual providing the personal information. DHPO will establish appropriate criteria for the retention of personal information.

6. Accuracy

DHPO will make every reasonable effort to ensure that personal information collected by it will be as accurate, complete and up-to-date as possible for the purposes for which the information is to be used.

DHPO will, on an ongoing basis, make every effort to ensure the accuracy and completeness of personal information under its control. Most personal information will be collected on the membership application and renewal forms, and the individual providing personal information will have the opportunity to do so in an accurate and complete manner.

DHPO will develop a procedure to enable members to update personal information on file. DHPO will review regularly the accuracy and completeness of personal information on file.

7. Security of Personal Information

DHPO will safeguard and protect personal information under its control by implementing security measures appropriate to the sensitivity of the information. DHPO will ensure that its employees keep all personal information confidential and comply with the security standards established by DHPO.

DHPO shall require third parties to whom personal information is disclosed to commit to an appropriate level of security in protection of such information to satisfy the standards established by DHPO.

On the disposal or destruction of personal information, DHPO will take the necessary precautions to prevent third parties from accessing such information and to maintain the confidentiality of such information.

8. Transparency and Openness

DHPO will make available to any interested individual specific information about DHPO's personal information policies and procedures relating to personal information that is under the control of DHPO. DHPO will facilitate access to its personal information policies and procedures, and will make available information concerning the identity of its Privacy Officer, and the means by which a person can communicate with the Privacy Officer. DHPO will also ensure that individuals are aware of the means of gaining access to their personal information.

9. Individual Access to Personal Information

An individual providing personal information to DHPO will be informed about the existence, use and disclosure of his or her personal information, and will be given access to and the right to ensure the

accuracy and completeness of such information. An individual will be able to address the accuracy and completeness of his or her personal information and have it amended, if inaccurate or incomplete.

DHPO will respond promptly to any request by an individual for access to his or her personal information.

DHPO will maintain a complete record of third parties to whom personal information has been disclosed, and will make such record available to an individual whose personal information has been so disclosed.

10. Questions and all Concerns Regarding Compliance with this Policy

An individual providing personal information to DHPO may address any question, concern or complaint regarding DHPO's compliance with this personal information policy to the Privacy Officer. DHPO will establish a procedure for processing any complaint about the personal information policy to ensure that all complaints are dealt with in an objective, fair and expeditious manner.

11. Visiting the DHPO Web Site

A visitor to the DHPO Web site is not required to reveal any individually identifiable information, such as name, address, or telephone number. Nor is such information collected passively by electronic means.

Information is collected when an individual voluntarily completes an online membership application or renewal form or completes an online survey. This information is collected, used or disclosed in a manner consistent with this policy statement. E-mail addresses are also collected during the online membership application process but applicants may indicate that they do not wish to receive any unsolicited electronic communication.

Our Web server does not collect visitor information in the form of the visitor's domain or Internet Protocol (IP) address but does collect information regarding which pages are accessed. This information is used internally, only in aggregate form, to better serve visitors by helping us to:

- Manage our site
- Diagnose any technical problems; and
- Improve the content of our Web site.

Following its use, the information collected is not retained but, rather, is discarded in a secure manner.

Individuals who wish to do business transactions are requested to supply one or more items of data within the following classes of information:

- Personal Identification Information
- Financial Information (e.g., credit card information, purchase order numbers or any other payment information for billing purposes); and
- Delivery Information

This information is collected for billing and delivery purposes as well as to permit DHPO to contact the individual with respect to actions taken by DHPO to complete the order.

If a purchase is made through the web site using a credit card, the credit card information is used only for credit card processing purposes.

For the transfer and receipt of certain types of sensitive information such as financial information, visitors will be re-directed to a secure server and will not be notified through a pop-up screen on the site.

In browsing the Internet, a technology called “cookies” can be used to provide specific information from a Web site as well as provide the operator of a Web site with information about the individual. A “cookie” is an element of data that a Web site can send to a browser, which may then store it on the system. An individual can set his or her browser to notify him or her when a cookie is received, giving the individual the opportunity to decide whether to accept it. The DHPO Web site does use cookies but only to record session information.

A user of the Web site may access the information held by the DHPO about them in connection with their visits to this site as well as their account information. Users may request the correction of any inaccuracies in such information. Access to and, if required, correction of such information may be arranged by sending an e-mail message to info@dhpo.ca.