



618 South Pelham Rd.
Welland, ON L3C 3C8
Ph: 905-732-1278 Fax: 905-732-3451

5547 Portage Road, Unit 2,
Niagara Falls, ON L2G 5Y2
Ph: 905-358-9090 Fax: 905-358-6363

Privacy Policy

January 2024

Generations Sport & Spine Physiotherapy Centre Inc has developed this "Privacy Policy" in accordance with The Personal Information Protection and Electronic Documents Act (PIPEDA) and Personal Health Information Protection Act (PHIPA).

Policy objectives

In carrying out our mandate under both the Privacy Act and the Personal Information Protection and Electronic Documents Act (PIPEDA), Generations Sport & Spine Physiotherapy Centre Inc collects personal information as defined by section 3 of the Privacy Act. We are committed to respecting the privacy rights of everyone whose personal information we have collected. This Policy is designed to comply with the Privacy Act.

Why do we collect personal health information?

We collect personal health information at Generations Sport & Spine Physiotherapy Centre in order to create a computer and paper file for each client for clinical appointments and for those accessing the fitness centre. We gather background information on each client so the physiotherapist and/or massage therapist and/or pedorthist and/or kinesiologist can provide the treatment necessary for your concern(s). Upon your consent, we also use certain personal health information to communicate with private insurers providing payment for the service provided. We can only use your personal information for the purpose for which it was obtained or for a use consistent with that purpose, or for a purpose listed in Section 8 of the Privacy Act.

What are our responsibilities?

We continually strive to improve and maintain our privacy adherence to protect your personal health information from risk of theft, accidental loss/disposal, unauthorized access, copying, or modification:

- All information gathered is stored in password protected computers and locked filing cabinets.
- Our scheduling and charting program JANE and fitness program VIRTUAGYM operate via the internet on Google Chrome with encryption and secure data transfer with a secure server bank and regular back-ups.
- Credit card data is not collected by JANE.

- JANE is password protected with sign-out & sign-back in for secure use and secure log-out on all sessions.
 - Account owners can control access permissions for each user, which includes control of accessing patient charts, billing records, and schedule records.
- The Fitness and aquatics members at the Welland location may consent to recurring credit card payments for fitness membership payments in VIRTUAGYM.
 - After the first payment is made by the client, the card data is saved on the side of the provider, and future payments can be easily executed without requiring any action from the side of the client.
 - Currently, recurring card payments are possible via Paysafe as payment provider.
 - Generations Sport and Spine Physiotherapy Centre Inc must report compliance with PCI DSS to confirm that our business is processing card payments securely, in accordance with the PCI Data Security Standard.
- Each employee/volunteer/student/contract worker must sign and acknowledge their understanding of our “Confidentiality Agreement” to ensure client privacy.
- Each employee/volunteer/student/contract worker are trained to collect, use, and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- As per our Regulatory Bodies we must to retain personal information for 10 years to ensure that we can answer any questions a client may have about the services provided.
- Paper files containing personal information are destroyed by cross-cut shredding.
- Electronic information is destroyed by deleting it and the hard drive is physically destroyed when hardware is disposed of.

What personal health information will Generations Sport & Spine Physiotherapy Centre collect?

Upon filling out the “Patient Forms” prior to your first appointment, we request your consent to collect your personal health information directly from you or from your caregiver (the person acting on your behalf). The following are some examples of personal health information:

- Your name;
- Date of birth;
- Address;
- Background information in our “Patient Health Questionnaire” to gather information about your health;
- The physiotherapist and/or massage therapist and/or kinesiologist and/or pedorthist will record information and details pertaining to each treatment session at Generations Sport & Spine Physiotherapy Centre;
- Occasionally, if you have consented or the law permits, we may need to collect personal health information about you from other sources. Eg. copy of x-rays from your physician.
- Credit card information is collected for payment in Virtuagym -no paper copies of any information is retained on site; information is stored in accordance with security through PaySafe as noted above.

How will Generations Sport & Spine Physiotherapy Centre use my personal health information and what information will they disclose to others?

Your personal health information will be used and disclosed only for the following purposes:

- Treating your ailment through physiotherapy and/or massage as scheduled;

- Your information will be transmitted to private insurers, WSIB or through HCAI (motor-vehicle accident claims) as consented upon your initial visit;
- To create schedules for services including fitness classes in Virtuagym.
- To directly invoice you to collect payment for your treatment session;
- To conduct risk management and quality improvement activities eg. health and safety concerns;
- To collect unpaid accounts;
- To process credit card payments;
- To advise clients that their product or service should be reviewed (eg. product recalls);
- To advise clients of special events (eg. upcoming customer appreciation days, seminars);
- To adhere to legal and regulatory requirements;
- For other purposes permitted/required by the law.

What are my rights?

You have the right to access your personal health records at any time. If you choose you may withdraw your consent for some of the above uses and disclosures (subject to legal exceptions) by contacting our contact person.

Who may I contact if I have any questions?

Shelby Bruni
Human Resources
(289) 219-0081
E-mail: sbruni@generationsphysiotherapy.com