



## **NorthWest Ontario Counselling & Consulting - Privacy Policy**

Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) requires all businesses located within provinces that have not adopted equivalent legislation to create a privacy policy that explains how and why they collect consumers' personal information. In addition, Ontario's Personal Health Information Protection Act (PHIPA) also imposes additional obligations with respect to the collection, use, and disclosure of personal health information. This Privacy Policy governs the manner in which NorthWest Ontario Counselling & Consulting (NWOCC) operating as a therapist collects, uses, maintains and discloses information collected from users (each, a "User") of its website located at <https://nwocc.ca/> ("Site").

If you reside in the European Union ("EU"), United Kingdom, Lichtenstein, Norway, Iceland or Switzerland, you may have additional rights with respect to your personal identification information and personal health information, as further outlined below. These rights may include rights under the EU's General Data Protection Regulation ("GDPR"), if you are a resident of the EU, United Kingdom, Lichtenstein, Norway or Iceland.

### **Personal Identification Information**

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site, place an order, fill out a form, respond to a survey, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, phone number. Users may, however, visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain Site-related activities. Publicly available information, such as a public directory listing of your name, address, and telephone number is not considered to be personal identification information.

### **Personal Health Information**

In addition to personal identification information, this Privacy Policy also applies to any personal health information collected from Users which includes any information about an individual, whether in oral or recorded form, that identifies the individual or could enable such identification and that relates to the individual's health, medical history or past or future medical treatment.

### **Non-personal Identification Information**

We may collect non-personal identification information about Users whenever they interact with our Site through log files. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system, browser type, date and time stamp, referring/exit pages, and the Internet service providers utilized and other similar information. These are not linked to any information that is personally identifiable. The purpose of the information is to analyze trends, administering the site, tracking users' movement on the website, and gather demographic information.

### **Web Browser Cookies**

Our Site may use “cookies” to enhance User experience. User’s web browsers place cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

### **How We Use Collected Information**

NWOCC may collect and use Users personal information for the following purposes:

- *To run and operate our Site*  
We may need your information to display content on the Site correctly.
- *To improve customer service*  
The information you provide helps us respond to your customer service requests and support needs more efficiently.
- *To personalize user experience*  
We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.
- *To improve our Site*  
We may use the feedback you provide to improve our products and services.
- *To run a survey or other Site feature*  
To send Users information they agreed to receive about topics we think will be of interest to them.
- *To send periodic emails*  
We may use the email address to send User information and updates pertaining to their



order. It may also be used to respond to their inquiries, questions, and/or other requests.

Notwithstanding the foregoing, personal health information collected from an individual through our Site will only be used for the purposes of providing healthcare services to the individual. Before using any personal health information beyond that for which the information was collected, we will seek express consent from the individual except where the information:

- a. is needed to prevent serious bodily harm or reduce a significant risk of harm to any person;
- b. is being collected to educate our staff on the provision of healthcare;
- c. is being used to manage risks and errors to improve the quality of healthcare services;
- or
- d. must be disclosed by law.

### **Accuracy, Access and Correction**

We will take reasonable steps to ensure that all personal identification information and personal health information that we collect is accurate, complete, and up-to-date. Upon request and verification of identity, our Users will be informed of the existence, use, and disclosure of their personal identification information and personal health information and given access to that information in accordance with PIPEDA and PHIPA. When a User demonstrates the inaccuracy or incompleteness of their personal identification information or personal health information, we will take reasonable steps to promptly correct the information.

### **How We Protect Your Information**

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site. This includes, for example, firewalls, password protection and other access and authentication controls. We also use SSL technology to encrypt data during transmission through the public internet, and we also employ application-layer security features as further protection.

While no method of transmission over the Internet, or method of electronic storage, is 100% secure, if we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.



## **Sharing Your Personal Information**

We do not sell, trade, or rent the personal identification of our Users to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

## **Data Retention**

When you request a consultation or post a comment through the Site, we will maintain your information for our records for a limited period of time as long as we need it to fulfill the purposes for which we have initially collected it, unless otherwise required by law, unless and until you ask us to delete this information. In addition, all personal health information is retained in accordance with the required retention time as prescribed under PHIPA.

## **Electronic Newsletters**

If a User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc.

## **Third-Party Websites**

Users may find advertising or other content on our Site that links to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's terms and policies.

## **Changes to This Privacy Policy**

We have the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our Site. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

## **Breach Notification**



All known or suspected privacy breaches must be reported to our Chief Privacy Officer as soon as reasonably possible. We have a responsibility to ensure that privacy breaches are properly contained, and investigated and that further privacy breaches are prevented. All of our patients will be informed of the loss, theft, or inappropriate access, use or disclosure of their personal health information as soon as reasonably possible, as required by PHIPA. Under PHIPA we also have mandatory privacy breach reporting requirements to the Information and Privacy Commissioner of Ontario as well as to relevant regulatory colleges.

### **Your Acceptance of These Terms**

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

### **Contacting Us**

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at [admin@nwocc.ca](mailto:admin@nwocc.ca)

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information. We will describe the complaint procedures to anyone who makes inquiries or lodges complaints.

If you are not satisfied with our response after making a complaint, you may have recourse to additional remedies under PIPEDA and/or PHIPA. For further information, please contact the federal Privacy Commissioner or the Privacy Commissioner of Ontario, as applicable.

This Policy was last updated on October 16th, 2024.