

## **Privacy Policy – Tuning Into Wellness Corp.**

Privacy of personal and health/wellness information is an important principle to Tuning Into Wellness Corp., its Founder and subcontractors. Tuning Into Wellness Corp. is committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. Tuning Into Wellness Corp. also tries to be open and transparent as to how we handle personal information. This document describes our privacy policies.

### **WHAT IS PERSONAL INFORMATION?**

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health/wellness services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is to be contrasted with business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

### **WHO WE ARE**

Tuning Into Wellness Corp. is an organization providing coaching and wellness services to clients. The main service provider is Loretta Langille who is the founder and CEO. Subcontractors and referral service partners may have limited access to your information with your prior consent. We use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include our accountants, bookkeeper, bookkeeping software services (ie. QuickBooks will have your name, email and payment details), lawyers, and marketing individuals/services (ie. If you join our newsletter, they will have you name and email our newsletter provider is Vertical Response at Deluxe Company), our scheduling software (Acuity Scheduler will have your name, email and phone number), and G-Suite/Google apps will hold some of your information in our Google Drive folder (shared between the client and the coach). Tuning Into Wellness Corp. restricts their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

### **PERSONAL INFORMATION COLLECTED: PRIMARY PURPOSES**

#### **About Clients**

We collect, use and discloses personal information in order to serve our clients. The primary purpose for collecting personal information is to provide Coaching and wellness services. For example, we collect information about a client's contact information, goals, health and wellness in order to assist clients in the coaching process, to raise their awareness and allow the client to explore topics they want to during coaching sessions.

A second primary purpose is to obtain a baseline on goals, health and wellness information so we can identify changes that are occurring over time.

#### **About Members of the General Public**

For members of the general public, our primary purposes for collecting personal information are to provide notice of special events or to make them aware of our services in general or our business in particular. For example, while we try to use work contact information where possible. We collect name and email addresses when people sign up for our email newsletter and have an unsubscribe button to allow individuals to remove

themselves after they have joined. From time to time we may run a draw at a conference, show or other event where we will collect names, email, phone numbers but will only add people to the newsletter if they have agreed to it (opted in). We try to obtain consent before using any such personal information, but where this is not, for any reason, possible, we will upon request immediately remove any personal information from our distribution list. Any other names/phone numbers entered into the draw who have not given their consent to be contacted will be shredded and disposed of. We will never sell anyone's information.

On our own website we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your email message, to schedule an appointment, to subscribe to our newsletter). Cookies are only used to help you navigate our website. Weebly is our website host provider and we have no control over Weebly's business actions.

### **PERSONAL INFORMATION COLLECTED: RELATED AND SECONDARY PURPOSES**

Like most businesses, Tuning Into Wellness Corp. collects, uses and discloses information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To invoice clients for goods or services that were not paid for at the time, or to collect unpaid accounts.
- To advise clients that their product or service should be reviewed
- To advise clients and others of special promotions that we have available.
- To review client files for legal purposes if subpoenaed by law.
- We believe that we should report information suggesting serious illegal behaviour to the authorities including Child Abuse. Also, like all organizations, various government agencies (e.g., Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, etc.) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g., lawyers, accountants) who will investigate the matter and report back to us.
- The cost of some goods/services provided by the organization to clients is paid for by third parties (e.g., private insurance, client's employer). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain limited information in order to demonstrate client entitlement to this funding.
- Clients or other individuals Tuning Into Wellness Corp. deals with may have questions about our goods or services after they have been received. We also provides ongoing services for many clients over a period of months or years for which our minimal previous records are helpful. We retain client information for a minimum of one year after the last service was provided to enable us to provide the best service.
- If Tuning Into Wellness Corp. or its assets were to be sold, the purchaser would want to conduct a "due diligence" review of the business records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization's business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be part of some of these related or secondary purposes (e.g., by declining to receive notice of special events or opportunities, by paying for your services in advance).

## **PROTECTING PERSONAL INFORMATION**

Loretta understands the importance of protecting personal information. For that reason, she has taken the following steps:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital, which signals are more difficult to intercept.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line (direct personal email), Google Drive folder or is anonymized or encrypted.
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must enter into privacy agreements with us.

## **RETENTION AND DESTRUCTION OF PERSONAL INFORMATION**

Loretta retains personal information for some time to ensure that she can answer any questions you might have and for coaching accountability (ie. to follow up on coaching objectives, short and long term goals). However, we do not want to keep personal information too long in order to protect your privacy. During coaching sessions minimal to no notes are taken or kept for your privacy.

Tuning Into Wellness Corp. keeps client files up to three years following the last coaching session/service. Our client and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away. We keep any personal information relating to our general correspondence (i.e., with people who are not clients) newsletters, seminars and marketing activities for about six months after the newsletter ceases publication.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

## **YOU CAN LOOK AT YOUR INFORMATION**

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity before providing you with this access. We reserve the right to charge a nominal fee for such requests. We may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

## **DO YOU HAVE A QUESTION?**

Our Information Officer, Loretta Langille, can be reached at:

230 Eaton Street | Georgetown, ON | L7G 6N9  
PHONE (416) 409-1556

She will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. We will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

If you have a concern about the professionalism or competence of our services or the mental or physical capacity of any of our professional staff Loretta would ask you to discuss those concerns with her.

This policy is made under the Personal Information Protection and Electronic Documents Act. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some rare exceptions to the commitments set out above.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

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PHONE (613) 995-8210 | TOLL-FREE 1-800-282-1376 | FAX (613) 947-6850 | TTY (613)  
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