

HEALTH AND WELLNESS SERVICES - PRIVACY POLICY

Effective Date: August 2, 2024

The University of St. Michael's College ("**USMC**") and its employees and contractors, including but not limited to its Wellness Counsellors and Social Workers (collectively, "**us**", "**we**", or "**our**") are committed to protecting your privacy. This Privacy Policy explains how we collect, use and disclose your personal information. It applies to all personal information collected by us when you use the USMC's health and wellness resources or services (collectively, the "**Services**").

By using the Services, you agree to the collection, use, and disclosure of personal information in accordance with this Privacy Policy.

What personal information do we collect?

When you use our Services, we may collect or receive personal information (including personal health information) about you to provide our Services and operate our business. We collect the following personal information:

(a) Information You Provide to Us Directly

You may provide your personal information to us when you use our Services, including when you are making an appointment, meet with our Wellness Counsellor, meet with our Social Worker, contact us with inquiries, or otherwise access our Services. This information may include:

- **Contact information**, such as your name, email address, phone number, and mailing address;
- **Health information**, such as your health history, individual's family health history, information about the individual's physical condition and physical function
- **Demographic information**, such as your age, and gender;
- **Information we generate about you**, including the observations or opinions of our health care professionals and information relating to your use of the Services; and
- **Student Information**, such as your student identification number.

We may collect other information that you choose to provide to us, or that we collect with your consent.

(b) Information Received From You as Part of Your Communications

When you use our Services, complete electronic forms, communicate with us or contact us by email or phone, we may automatically collect and store certain information about you and the activity you engaged in, for example: your name and contact information; information that you voluntarily provide to us; the nature of your communication; the purpose of the interaction, and the action we took in response to your inquiry or request.

For what purposes do we use personal information?

We may use personal information we collect or receive about you for various purposes.

(a) To Provide You With Our Services

We use your personal information to provide you with the Services. Specifically, we may use your personal information to: (i) assess your mental health needs; (ii) provide counselling sessions, therapy sessions and treatment programs; (iii) provide you with social work services; (iv) provide you with wellness advising; or (v) communicate with health care providers, including physicians, nurses, therapists and pharmacists, USMC and other organizations if you provide his or her consent for and prior to the disclosure.

(b) To Maintain, Improve, and Personalize the Services

We use your personal information for our everyday business operations such as auditing, administration of the Services. Your information may also be used to help us improve our Services. We also use your information to personalize your experience.

(c) To Communicate with You

We use your personal information to:

- communicate with you;
- distribute health care information to you; and
- respond to inquiries and requests from you.

In the event you contact us, we use certain information to respond to your questions and assist you with any issues that may arise in your use of the Services.

(d) To Plan, Administer and Manage the Internal Operations of the USMC

We may use your personal information to plan, administer and manage the internal operations of the USMC.

(e) To Meet Accreditation Standards

We may use your personal information to meet accreditation standards including the Ontario College of Social Workers and Social Services Workers.

(f) To Compile Statistics and Conduct Research and Wellness Surveys

We may use your personal information to compile statistics and conduct research and student wellness surveys.

(g) To Maintain Legal and Regulatory Compliance

Our Services are subject to certain laws, regulatory and/or professional obligations, which may require us to process your personal information. For example, we process your personal information to fulfill our professional obligations, or as necessary to manage risk as required under applicable law.

(h) For Other Purposes Permitted or Required by Law

We may use personal information for other purposes disclosed to you at the time we collect or receive the information with your consent or as permitted or required by law.

When and to whom do we disclose personal information?

Your personal information is not shared with third parties without your permission, except as described below.

Our partners: We may share information with and among our partners to provide our Services and for other purposes outlined in this Privacy Policy.

Service providers: We may transfer (or otherwise make available) personal information service providers (including affiliates acting in this capacity) who perform services on our behalf. For example, we may use service providers to provide back-up, process payments, or store data (i.e., OWL Practice, Inc.). Personal information may be maintained and processed by our service providers in Canada or other jurisdictions. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own purposes.

Disclosures authorized or required by law: There are limited situations where we are legally required or authorized to disclose your personal information without your consent. In certain circumstances, we are required or permitted by law to disclose your personal health information without your consent. For example, your consent to collection, use and disclosure of your personal health information is not required in the following circumstances (without limitation):

- for the purposes of contacting a family member, friend or substitute decision-maker if you are injured, ill or incapacitated and unable to give consent personally;
- it is necessary for the purpose of eliminating or reducing a significant risk of serious bodily harm to a person or group of persons;
- in order to comply with a Court order or police warrant;
- disclosure to the Wellness Counsellor's or Social Worker's potential successor; and
- such other exemptions permitted or required by law.

Disclosures with consent: We may disclose your personal information in other circumstances with your consent.

You can withdraw your consent to have your information shared with other parties at any time, except where the disclosure is required by law.

What are your rights?

USMC aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your personal information.

(a) Your Rights

This section lists the privacy-related rights ("**Rights**") we extend to you. Your right to know and right to deletion are not absolute and are subject to certain exceptions.

- **Right to Know** – You have the right to know the personal information we collect, use, and disclose about you.
- **Right to Deletion** – You have the right to request that we delete any personal information we have collected from you or maintain about you. We may save personal information when permitted by applicable law including, without limitation, when the information is needed for a legal purpose.
- **Right to Correction** – You are free to request correct of your personal information where you believe there is an error or omission. You are entitled to require that a statement of disagreement be attached to your information reflecting any correction that you requested but not made by us. You are also entitled to require that any person to whom the personal information has been disclosed within the year before your request be notified of the correction or statement of disagreement.

You must send a written request to access or correct your personal information which may include a fee. Your written request must contain sufficient detail to enable us to identify and locate the record. To request your personal information, please phone or send an email to Jessica Barr, the University Archivist and Records Manager at 1-416-926-1300 ext. 2348 and jj.barr@utoronto.ca. Jessica Barr will process your request and will obtain the information from us.

We will contact you if your request is deficient or it needs to clarify the information you are requesting. We will also need to verify your identity before processing requests for your personal information.

How secure is your information?

Safeguards are in place to protect the security of your information. These safeguards include a combination of physical, technological and administrative security measures that are aimed at protecting personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Please note, however, that while we believe our security measures are appropriate, no security measures can guarantee absolute security of information.

How long do we keep information?

We will retain your personal information for as long as your account is active or as needed to provide you Services. We will also retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

What if we transfer your personal information to another jurisdiction?

Your information, including personal information, may be transferred to — and maintained on — computers located outside of your province, country or other jurisdiction where the data protection laws may differ than those from your jurisdiction.

We are based in the Canada and, regardless of where you use our Services, the information collected as part of that use will be transferred to and maintained on servers located in Canada. Any information we obtain about you will be stored in accordance with Canadian privacy laws, regulations, and standards, which may not be equivalent to the laws in your country of residence. By using our Services, you consent to this collection, transfer, storage, and processing of information to and in Canada.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

How can you contact us?

If you have any questions or concerns relating to this Privacy Policy or our privacy practices, please contact:

Emily VanBerkum-Farahat

Manager, Community Wellness

Email: emily.vanberkum@utoronto.ca

Phone: 416-926-7130

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