



Calm mind.
Fit body.
Inspired life.

Moksha Yoga Bloor West Privacy Policy

Privacy of personal information is important to Moksha Yoga Bloor West. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We are open and transparent in how we handle personal information. This document describes our privacy policies. Please read this document carefully to understand how Moksha Yoga Bloor West protects your personal information.

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), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., 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

Moksha Yoga Bloor West is a hot yoga studio; our services include yoga classes and massage treatments. Our staff consists of Yoga Instructors, Massage Therapists, and Desk Staff. 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 computer consultants, bookkeepers and accountants, credit card companies, file clerks, data entry personnel, website managers, cleaners, couriers, and lawyers. We restrict 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.

WE COLLECT PERSONAL INFORMATION: PRIMARY PURPOSES

About Clients

Like all health care professionals, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide massage therapy treatment. For example, we collect information about a client's health history, including their family history, physical condition and function and social situation in order to help us assess what their health needs are, to advise them of their options and then to provide the health care they choose to have. A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that are occurring over time. It would be rare for us to collect such information without the client's express consent, but this might occur in an emergency (e.g., the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from our client and we have no reason to believe that the message is not genuine).

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 massage therapy services.

On our 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) cookies are only used to help you navigate our website and are not used to monitor you.

WE COLLECT PERSONAL INFORMATION: RELATED AND SECONDARY PURPOSES

Like most organizations, we also collect, use and disclose 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 and services that was not paid for at the time, to process credit card payments or to collect unpaid accounts.

- ❑ Massage therapists are regulated by the College of Massage Therapists of Ontario who may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, as professionals, we will report serious misconduct, in competence or incapacity of other practitioner, whether they belong to other organizations or our own. Also, our organization believes that it should report information suggesting serious illegal behavior to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, or other individuals, to support the concern (e.g., improper services) 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 good/services provided by the organization to clients is paid for by third parties (e.g., private insurance). These third-party payers often have your consent to legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.

- ❑ Clients or other individuals we deal with may have questions about our goods or services after they have been received. We also provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services (our regulatory College also requires us to retain our client records for this period of time).

- ❑ If Moksha Yoga Bloor West or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the studio’s 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 at date of service). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulations).

PROTECTING PERSONAL INFORMATION

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- ❑ Paper information is either under supervision or secured in a locked or restricted area.
- ❑ Paper information is transferred in sealed envelopes, marked private and confidential, sent by Canada Post or reputable courier.
- ❑ 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 cell phones are digital, which signals are more difficult to intercept.
- ❑ Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- ❑ Staff is 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.

DISCLOSURE OF PERSONAL INFORMATION

We are requested at times to supply a photocopy of a client's file to lawyers or insurance companies. This request is only granted when a formal request is accompanied by the client's signature in person agreeing to the release of their information to that particular lawyer/insurance company. The following are the rare exception to the above:

- ❑ To the organization's lawyer,
- ❑ For debt collection purposes,
- ❑ To comply with a subpoena, warrant or court order,
- ❑ At the request of a government institution for national security, law enforcement or administration,

- At the initiative of the organization, to provide information to a government institution or a specified investigative body relation to law enforcement or national security,
- At the initiative of a specified investigative body relating to law enforcement,
- Where disclosure is required by law.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our client files for ten years. Our client and contact directories are much more difficult to systematically destroy, so we remove such information when we can, if it appears that we will not 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 (e.g., with people who are not clients) seminars and marketing activities for two years after the seminar or marketing activity is over.

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, if we do not know you, before providing you with this access. We reserve the right charge a nominal fee for such requests. If there is a problem 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.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation that our files our wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

DO YOU HAVE A QUESTION?

If you have any questions or concerns, please contact:

Don Christensen or Nicole McNamara
2454 Bloor Street West
Toronto, ON M6S 1R2
(416) 766 -9642

If you wish to make a formal complaint about our privacy practices, you may make it in writing to the above persons. They 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, we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory bodies:

College of Chiropractors of Ontario
130 Bloor Street West, Suite 902
Toronto, ON M5S 1N5
416 922-6355
416 925-9610 fax
www.cco.on.ca

College of Massage Therapy of Ontario
1867 Yonge Street, Suite 810
Toronto, ON M4S 1Y5
416 489-2626
1-800-465-1933
416 489-2625 fax
www.cmto.com

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

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 contacted at:

Privacy and Information Commissioner
112 Kent Street
Ottawa, ON K1A 1H3
613 995-8210
1-800 282-1376
613 947-6850 fax
613 992-9190 TTY
www.privcom.gc.ca