

***PRIVACY POLICY***  
***Cascade Disability Management Inc.***

At Cascade, we are committed to respect the privacy of people we provide service to – our clients. We are also committed to protect the privacy of information pertaining to customers and employees.

In Accordance with the Federal Government's *Personal Information Protection and Electronics Documents Act (PIPEDA and the Model Personal Information Code of the Insurance Bureau of Canada)*, we have developed a Privacy Policy to ensure that all personal information maintained is confidential, secure and private.

**Definition of personal information:**

Personal information is identifiable information regarding an individual. This may include but is not limited to:

- Contact information (name, address, telephone number, email address)
- Gender
- Date of birth
- Ethnic background
- Insurance/benefit coverage
- Date of accident/injury/illness
- Family and marital status
- Past and present daily activities
- Past and present medical information – including functional status, treatment, medication regime, diagnosis and prognosis
- Employment history – including salary information
- Educational background
- Legal representative/ worker representative

**How do we use personal information?**

We may use personal information for the following purposes:

- identifying the individual
- establishing and maintaining file information
- ensuring the information in our records is accurate
- verifying previously given information when necessary
- producing reports and/or generating file information
- meeting legal and regulatory requirements

**Consent:**

Client authorization/consent (written) must be obtained prior to the collection or disclosure of information – except where required by law, or where it is impossible for legal or safety reasons. Further consent will be obtained where information is being disclosed for a purpose other than what was originally consented.

**How can the client withdraw consent?**

A client may refuse consent or request that consent be withdrawn at any time by contacting our Chief Privacy Officer in writing.

A withdrawn consent limits the services or products that can be provided and may lead to a discontinuation of the referral arrangement.

**Why and how is information collected?**

Personal information is collected in order to assess, plan and make appropriate recommendations regarding the services requested.

The collection of information is limited to the use and disclosure for the purpose of which our services were retained.

Information may be collected through an interview/assessment, telephone discussions, review of referral documents, contact with the referral party, worker and or worker representative, employer(s) and external service provider(s).

**Disclosure of Personal Information:**

Appropriate consent or authorization must be provided by the client or your representative prior to the collection or disclosure of personal information.

The disclosure of personal information is limited to the purposes for which we have been formally requested to provide.

Personal information will be received and disclosed to Workplace Safety and Insurance Board and or third party payer (ie. the insurance company, lawyer) who have contracted our services. Third party payers often have legislative authority or client consent to direct us to collect and disclose information in order to demonstrate client entitlement.

Personal information may be disclosed without the clients permission or knowledge in the instance where we are legally obligated to do so. (i.e. emergency that threatens your health, safety or security, a subpoena or court order). Clients are informed of this provision when consent to disclose information is requested

**Safeguard of Personal Information:**

The security of personal information under our control will be safeguarded in a manner that is appropriate for the sensitivity of the information. It will be protected against unauthorized access, disclosure, copying, use or modification.

- All offices secure personal information
- Unnecessary or duplicate copies of personal information are shredded not discarded in recycle bins or trash receptacles
- All computers are password protected and changed on a scheduled basis
- Laptops and other physical assets are appropriately secured when off premises
- Voicemail messages can only be accessed with passwords
- Faxes are collected regularly by staff and delivered to the appropriate person
- Sensitive information is to be appropriately secured each evening
- When transferring information to a third party, any information that is not reasonably required should be removed or masked

Employees are trained in the importance of protecting personal information in accordance with our privacy policy.

**Disposal of Personal Information:**

Information is retained as mandated by appropriate legislation, after which time, the information is deleted if in electronic form or confidentially destroyed if in paper form.

**Access to Personal Information:**

Unless restricted by law or by the “*Personal Information Protection and Electronic Documents Act*,” clients have a right to access your personal information.

We will provide access to personal information upon written request from authorized individuals. Our verification practices help to minimize risk that such information is released to anyone not authorized to receive it.

Should a client request personal information they are required to forward the request in writing to our Chief Privacy Officer (contact information is listed below). If access cannot be provided, you will be advised within 30 days of the reasons that access cannot be provided.

**Chief Privacy Officer:**

You may contact the Chief Privacy Officer at:

By Mail: Ms. Amanda Leeming  
Cascade Disability Management Inc.  
1 Eva Road, Suite 205  
Etobicoke, ON M9C 4Z5

By Phone: (416) 259-6659  
By Fax: (877) 494-5982

Any factual information may be questioned and corrections may be requested. This does not apply to professional opinions. You may be asked to provide documentation to support your request.

If we are unable to provide access to personal information, we will provide an explanation.

We may not be able to provide you with full access to your information if:

- It contains references to other individuals
- We would have to disclose proprietary information regarding Cascade Disability Management Inc or its affiliates
- It has been destroyed as mandated by appropriate regulatory legislation involving documentation retention.
- It cannot be disclosed for legal or regulatory reasons

Cascade will keep information as accurate, complete and up-to-date as necessary for the purposes for which it is used. Should you find an error in our records, you may request in writing to our Chief Privacy Office a correction or addition.

Cascade reserves the right to charge a nominal fee for providing access and copies of your personal records, however, you will be notified in advance of those costs. According to specific criteria set out in subsection 8(4) of the Act, Cascade has 30 days to respond to your request and may request an additional 30 days if additional time is necessary based on the provisions outlined.