

## NOTICE OF PRIVACY PRACTICES

At Cleveland Clinic Canada, we are committed to keeping your personal health information private. This Notice describes the privacy practices of Cleveland Clinic Canada. This Notice also describes how your personal information may be accessed by and disclosed to Cleveland Clinic Canada's affiliated facilities, including the Cleveland Clinic hospital located in Cleveland, Ohio, USA ("Cleveland Clinic US"). This Notice applies to all of the health records that identify you and the care you receive at Cleveland Clinic Canada.

### CLEVELAND CLINIC CANADA AND AFFILIATED FACILITIES

All of our employees, physicians, agents, and affiliated facilities will adhere to the terms of this Notice. All of these employees, physicians, agents, and affiliated facilities may share your personal health information with each other for reasons of treatment, payment, healthcare operations, and other uses as set out below.

### HOW CLEVELAND CLINIC CANADA AND ITS AFFILIATED FACILITIES MAY COLLECT, USE AND DISCLOSE YOUR PERSONAL HEALTH INFORMATION

When you become a patient of Cleveland Clinic Canada, we may from time to time collect, use, and disclose your personal health information for the reasons described in this Notice. The following categories describe some of the ways that we may collect, use, and disclose your personal health information.

**Treatment:** We may collect, use, and disclose your personal health information to provide you with healthcare services. We may disclose your health information to physicians, nurses, technicians, medical or nursing students, or other persons who need that information to take care of you. This may involve disclosing your personal health information to our affiliated facilities, including Cleveland Clinic US or other treating healthcare providers, including specialists and family physicians that are referring doctors.

**Payment:** We may collect, use, and disclose your personal health information so that the healthcare you receive may be billed and paid for by you, your insurance company, the Ontario Health Insurance Plan, or another third party. For example, we may tell your health plan about a treatment you are going to receive so we can get prior payment approval or to determine if your plan will pay for the treatment.

**Healthcare Operations:** We may use your personal health information for healthcare operations. This may help us operate Cleveland Clinic Canada to maintain and improve patient care. For example, we may use your personal health information for the purpose of risk management, or to improve or maintain the quality of care, or to improve or maintain the quality of any related programs or services.

**Location of Records:** We may use contractors or other Cleveland Clinic facilities for the storage and processing of health information. If you are a resident of Canada, you should be aware that your health information may be stored and processed in the United States of America. The laws of the United States may be different than those in Canada, such as access rights by government and law enforcement authorities.

**Health Information Exchanges:** We may participate in certain health information exchanges whereby we may disclose your health information, as permitted by law, to other healthcare providers or entities for treatment, payment, or healthcare operations purposes.

**Contacting You:** We may collect, use, and disclose your personal health information to reach you about appointments and other matters. We may contact you by mail, telephone, or e-mail. We may leave voice messages or text messages at the telephone number you provide us with, and we may respond to your e-mail addresses. We also send newsletters. You can unsubscribe at any time.

**Health-Related Services:** We may collect, use, or disclose your personal health information to send you mailings about health-related products and services available at Cleveland Clinic Canada or Cleveland Clinic US.

**Medical Research:** We may collect, use, and disclose your personal health information to perform medical research.

**Education:** We may collect, use, and disclose your personal information for teaching purposes.

**Compliance:** We may collect, use, and disclose your personal health information to comply with legal and regulatory requirements, including the delivery of patients' charts and records to the Royal College of Physicians and Surgeons of Ontario in a timely fashion, when required, according to the provisions of the *Regulated Health Professions Act*.

## **AUTHORIZATION FOR OTHER USES AND DISCLOSURES**

We will not collect, use, or disclose your personal health information for reasons other than as outlined in this Notice without your authorization or as otherwise permitted or required. If a new purpose arises for the use and/or disclosure of your personal health information, we will seek your approval in advance.

## **YOUR RIGHTS REGARDING PERSONAL HEALTH INFORMATION**

You may, subject to some legal exceptions, access and request a copy of and correct your own personal health information, or withdraw your consent for some of the above uses by contacting our Privacy Office at the address below. Your request to inspect or obtain a copy or correct your personal health information must be submitted in writing, and be signed and dated. We may charge a reasonable fee for processing your request. Requests for billing records should be sent to our billing department. We will never supply your information to an advertiser.

## **COMPLAINTS**

If you believe your privacy rights have been violated, you may file a complaint with Cleveland Clinic Canada or with the Information and Privacy Commissioner of Ontario. To file a complaint with Cleveland Clinic Canada you first must submit your complaint in writing to the Privacy Office at the address provided at the end of this Notice. To file a complaint with the Information and Privacy Commissioner of Ontario, contact the office of the Commissioner at:

Information and Privacy Commissioner of Ontario  
2 Bloor St. East, Suite 1400, Toronto, Ontario M4W 1A8  
Tel: 416.326.3333 or 1.800.387.0073 | Fax: 416.325.9195  
Website: [www.ipc.on.ca](http://www.ipc.on.ca) Email Address: [info@ipc.on.ca](mailto:info@ipc.on.ca)

## **CHANGES TO THIS NOTICE**

Cleveland Clinic Canada may modify this Notice in response to changes in privacy laws, rules, regulations, guidance, standards, or other similar requirements. Any changes in the Notice could apply to personal health information we already have about you, as well as any information we receive in the future. We will post a copy of the current Notice at our facilities and on our website at:

<https://my.clevelandclinic.org/canada/about/website/notice-of-information-practices>.

If you have any questions about this Notice, please contact our Privacy Officer at:

Attention: Dawn Lunan, Privacy Officer  
Brookfield Place, 181 Bay St., Suite 3000  
Toronto, Ontario M5J 2T3  
Tel: 416.507.6600 | 1-888-507-6885