

# Privacy Policy

Revision #3, 01 January 2008

Donna Costa, DSHomMed, RNCP  
309-140 Oxford Street East, London, ON N6A 5R9  
67 Classic Crescent, London, ON N5W 5T7

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## Privacy Policy

Issued By: Donna Costa – Privacy Officer  
Subject: Privacy Policy for: Donna Costa, DSHomMed, RNCP  
Effective Date: January 1, 2004  
Revision Date: January 1, 2008

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### 1.0 Overview

#### 1.1. Preamble

Privacy of personal information is an important principle of Donna Costa, DSHomMed, RNCP. I am committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for services provided by Donna Costa, DSHomMed, RNCP. This document describes my privacy policy.

#### 1.2. Effective Date and Revisions

I am required to comply with the terms of this privacy policy while it is in effect. I reserve the right to modify the policy at any time and the revised privacy policy will apply to all personal information that I currently have as well as to information that I may generate in the future. This policy will be in effect from February 1, 2005, until such date that an amended policy is published. If I change the privacy policy, I will post the amendments in my office, have copies available and publish it on my website for you to download.

#### 1.3. Personal Information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type;
- Opinions, evaluations, comments, social status, or disciplinary actions; and
- Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs). Personal information does not include the name, title, business address or telephone number of an employee of an organization and thus is not protected by privacy legislation nor covered by this policy.

#### 1.4. About Donna Costa, DSHomMed, RNCP

Types of Services:

- Homeopathic medicine and nutritional consultations
- Classroom instruction
- Workshop facilitation or instruction

Registered with Canadian Society of Homeopaths.

Registered with IONC (International Organization of Nutritional Consultants), formerly known as NCOC (Nutritional Consultants Organization of Canada).

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## 2.0 Purpose

The purpose of this document is to outline the policies in effect that govern the collection, storage, retention, use and disclose of personal information by Donna Costa, DSHomMed, RNCP. These rules are in place to protect Donna Costa, DSHomMed, RNCP, my clients, employees and volunteers. Failure to comply with this policy exposes Donna Costa, DSHomMed, RNCP and my clients to a breach of confidentiality resulting in potential legal liability and loss of confidence.

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## 3.0 Scope

This policy applies to the ownership, staff and volunteers of Donna Costa, DSHomMed, RNCP and to contractors and consultants that may provide services to Donna Costa, DSHomMed, RNCP on occasion.

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## 4.0 Policy

### 4.1. I Collect Personal Information:

The collection of personal information is limited to that which is necessary for the described purposes.

#### **Primary Purposes:**

- To collect information in order to provide homeopathic or nutritional assessment;
- To collect fees for consultations, homeopathic remedies, nutritional supplements, instruction or facilitation.

#### **Secondary Purposes:**

- Newsletters, emails, seminars, and workshops

#### **Disclosure:**

Donna Costa, DSHomMed, RNCP uses and discloses personal information only for purposes for which we have consent (implied or written), or as required by law. I do disclose your personal information as described below.

- To suppliers when shipping directly to the patient.
- To patient's medical doctor when required to confer or discuss patient's medical case, or to other medical professionals to discuss any medical reports or tests provided by the patient.

#### **Accuracy:**

I endeavour to maintain accurate and up-to-date records.

### 4.2. I Protect Personal Information:

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

- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this Privacy Policy.
- Paper copy is kept in a locked file cabinet and/or locked office in a supervised area.

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- Passwords are used on computers to protect electronic data, in a supervised area.
- Paper information is transmitted through sealed, addressed envelopes or boxes by postal or courier service.
- My web site is protected by security safeguards appropriate to the sensitivity of the information with the proper firewalls and virus protection in place.
- Verbal personal information is collected and used in such a manner that the information is not overheard by persons other than the staff.

#### 4.3. I Retain and Destroy Personal Information Records:

I need to retain personal information for some time to ensure that I can answer any questions you might have about the services I provided to you and for my own accountability to external regulatory bodies. In compliance with the requirements of other legislation, I keep my client files and records for a minimum of 10 years. I keep any personal information relating to my general correspondence (ie. newsletters seminars and marketing activities) for about 12 months after the newsletter ceases publication or a seminar or marketing activity is over. You can ask me, in writing, to restrict my uses and disclosures of your personal information at any time. I will discontinue to use or to disclose your personal information after a written revocation of your implied or informed consent is received, unless I have already acted in reliance upon this consent, or as directed by legal requirements. I destroy paper files containing personal information by shredding. I destroy electronic information by deleting it and, when hardware is discarded, I ensure that the information on the hard drive is destroyed.

#### 4.4. You Can Look At Your Information:

Upon request, you have the right to see what personal information I hold about you. I will need to confirm your identity, if I do not know you, before providing you with this access. I reserve the right to charge a nominal fee for such requests.

I may ask you to put your request in writing. If, for legal reasons, I cannot give you access, I will notify you within 30 days, and provide the reasons, as best I can, why I cannot give you access.

If you believe there is a mistake in the information I have about you, you have the right to ask for it to be corrected. I may ask you to provide documentation that may files are incorrect. Where a mistake has been made, I will make the correction.

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## 4.5. Do You Have A Question?

To answer any questions or concerns you might have, my Privacy Officer, Donna Costa, can be reached at:

67 Classic Crescent  
London, ON  
N5W 5T7  
[donnacosta@sympatico.ca](mailto:donnacosta@sympatico.ca)

If you wish to make a formal complaint about my privacy practices or the application of those practices, you may make it in writing to my Privacy Officer who will acknowledge receipt of your complaint, ensure that it is investigated promptly and that you are provided with a formal decision and explanation in writing.

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## 5.0 Enforcement

Anyone found to have violated this policy may be subject to disciplinary action, up to and including termination. Use of any personal information in the possession of or under the control of Donna Costa, DSHomMed, RNCP for illegal activity is grounds for immediate dismissal of office, and I will cooperate with any legitimate law enforcement activity.

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## 6.0 Further Information

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.

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:

112 Kent Street  
Ottawa, ON K1A 1H3  
Phone: (613) 995-8210  
Toll-free: 1-800-282-176  
Fax: (613) 947-6850  
TTY: (613) 992-9190  
Web site: [www.privcom.ca](http://www.privcom.ca)

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## 7.0 Revision History

Original: 01 January 2004  
Revision #1: 01 February 2005  
Revision #2: 31 May 2007  
Revision #3: 01 January 2008