

Protecting Your Privacy

Ontario Pharmacists' Association Privacy Policy

Protecting your privacy means

- **We DO NOT sell or otherwise provide your personal information or our member lists to persons not involved with providing the Ontario Pharmacists' Association (OPA) with services, programs and publications**
- **We collect, use and share your personal information ONLY with your consent and for the specific purpose(s) for which you have given consent**
- **We have safeguards in place to ensure that your personal information remains confidential**

Respecting your privacy rights: Introduction

As of January 1, 2004, the federal privacy law, the *Personal Information Protection and Electronic Documents Act* (PIPEDA) will apply within any province that has not passed "substantially similar" legislation. PIPEDA governs the flow of personal information in the course of commercial activities. This law requires the OPA to obtain your consent to collect, use and share your personal information, including some or all of the information the OPA currently has on record and has always collected, used and shared to provide our services, programs and publications to you.

You have always had the option of giving OPA permission to use your personal information. For example, your home e-mail address is used to provide you with e-mail notices concerning pharmacy-related issues on a timely basis. In the past, you have given OPA your permission in an informal way, but with the new law, OPA is required to ask you to give OPA your permission to collect, use and share your personal information in a more formal way.

What is personal information?

Personal information is broadly defined as information about an identifiable individual, but does not include the name, job title, business address, or business telephone number, of an employee of an organization. Personal information includes your home address, age, gender, marital status, identification numbers (e.g. your social insurance number), and employment records.

Why does the OPA collect, use and share your personal information?

The OPA wants to provide you with valuable services, programs and publications, and to establish a lasting professional relationship with you that will grow and change to meet your evolving needs. The OPA will only use and share your personal information for the purpose(s) for which it was collected and to which you gave your consent (the "identified purposes").

What personal information does the OPA collect, use and share?

With your consent, OPA may collect personal information from you in person, over the telephone, by mail, or via e-mail. The type of information OPA collects and maintains may include your name, personal mailing address, home e-mail address, home telephone number, home fax number, date of birth and payment information including credit card details.

What are the identified purposes of collecting information?

The OPA uses the personal information it collects in order to process your application for membership and to deliver our services, programs and publications to you. From time to time, the OPA may share personal information with independent third parties with whom we have confidentiality agreements, for the purposes of ensuring timely and efficient delivery of our services, programs and publications (e.g. for mailings, database maintenance services). If individuals, who are not OPA members, provide OPA with personal information in connection with requesting information about OPA membership or services, **OPA will use that information to respond to their inquiries and for the purposes of including them in OPA's annual membership campaign and forwarding them urgent notices directed at all Ontario pharmacists.**

Your personal information may also be used to compile statistics about OPA's business. These statistics include de-identified information that does not identify you personally.

Maintaining your personal information

The OPA *only* keeps your personal information for as long as necessary for the identified purposes. **Along with full-service delivery to OPA members, these purposes include OPA's annual membership campaign and urgent notices directed at all Ontario pharmacists.** The length of time OPA retains your personal information is also affected by any legal requirements OPA has to meet. This period may extend beyond your term as an OPA member.

The OPA has strict policies and procedures in place for destroying, deleting or disposing personal information when it is no longer needed, to prevent unauthorized access to such personal information.

The 10 Principles of Fair Information Practices

PIPEDA requires organizations, including the OPA, to adhere to 10 principles of fair information practices governing the collection, use and sharing of personal information. In the context of OPA's relationship with you, the principles involve:

- 1. Accountability:** Each organization, including the OPA, is responsible for personal information under its control. Accordingly, OPA has designated a Privacy Officer to oversee the OPA's compliance with the PIPEDA and the 10 Principles. The Privacy Officer will receive and respond to any complaints about the OPA's information management practices. The OPA trains staff about privacy issues, and has privacy policies and procedures in place to protect your personal information.
- 2. Identifying Purposes:** The OPA will identify the purposes for which your personal information is collected, either before or at the time of collection. If the OPA seeks to use personal information, that has been collected, for a new purpose that OPA has not previously identified, OPA will obtain your consent to the new purpose unless the new purpose is permitted by law.
- 3. Consent:** The OPA will only collect, use and share your personal information with your knowledge and consent, except where otherwise required or permitted by law.
- 4. Limiting Collection:** The OPA will limit the collection of your personal information to that which is required to accomplish the identified purpose(s).
- 5. Limiting Use, Disclosure and Retention:** As previously stated, the OPA will use or share your personal information for the identified purpose(s) or when it is required or permitted by law. The OPA will retain your personal information for the period of time required for the identified purposes. If OPA wishes to use that information for a new purpose, unless the use is permitted or mandated by law, OPA will obtain your consent for that purpose, and will document that consent.
- 6. Accuracy:** The OPA will maintain the personal information OPA collects from you as accurate, complete and up-to-date as necessary to fulfill the identified purposes.
- 7. Safeguards:** The OPA protects your personal information with safeguards against loss, theft, unauthorized access, disclosure, copying, or modification that are appropriate to the sensitivity of the information. OPA employees who deal with your personal information in the performance of their employment duties are aware of the importance of maintaining the confidentiality of your personal information and of ensuring that they

destroy or otherwise dispose of personal information in a manner that prevents unauthorized access.

8. Openness: The OPA makes information about OPA’s policies and practices relating to the management of personal information readily available to you, through our website at www.opatoday.com and in written format.

9. Access: Individuals have a right to access their personal information as well as the opportunity to challenge its accuracy and completeness and to have it amended as necessary. Accordingly, upon your written request to the Privacy Officer, the OPA will inform you in a timely manner and at minimal or no cost to you, of the nature of the personal information about you in OPA’s custody and control, of the use OPA has made of that information and of the parties to whom and which OPA has shared your personal information, and OPA will provide you access to that information except where such access is prohibited by law or OPA is permitted to provide access through a third party. You have the right to challenge the accuracy and completeness of your information, and to have it amended as necessary. Where an error or omission is discovered, the OPA will correct the personal information and transmit the corrected information to independent third parties where appropriate.

10. Challenging Compliance: You may contact the OPA if you have any questions, complaints or suggestions with respect to the above-outlined principles. Our Privacy Officer will respond to your inquiries and assist you in resolving the situation in a timely manner. In cases where the OPA’s privacy policies and procedures are found to be deficient in some measure, the OPA will take immediate steps to correct these deficiencies.

Keeping Your Personal Information Accurate

The OPA is committed to maintaining the accuracy of your personal information for as long as it is being used for the purposes set out in this Policy, and your input is essential in keeping the OPA up-to-date. Please notify OPA’s Privacy Officer promptly of any changes (e.g. address, telephone number) to assist OPA in providing you with the best possible service. As well, please advise OPA’s Privacy Officer should you believe, upon review of your personal information, that amendments are required.

Giving Consent

Consent is the cornerstone to protecting your privacy. The OPA will only collect, use, and share your personal information with your consent, except where otherwise required or permitted by law. The OPA does not, as a condition of the supply of OPA’s services, programs or publications to you, require you to consent to the collection, use, or sharing

of your personal information beyond that information which is required to for the identified purpose(s).

Refusing or withdrawing consent

At any time you may refuse to provide consent or withdraw your consent for the OPA to collect, use or share your personal information, subject to legal restrictions and reasonable notice. Simply inform the OPA's Privacy Officer what personal information you no longer wish to use or share. (See "Contact Us" below.)

It is always your choice as to whether or not you provide OPA with your personal information. Depending on the nature of the personal information you do not wish to provide, OPA may not be able to provide you with OPA's full scope of services, programs or publications, for example:

- No home e-mail address provided: You will not receive urgent e-mails providing timely information on hot topics (e.g. SARS, Ontario Drug Benefit updates) at your home
- No home address provided: You will not receive mailings (e.g. *The Ontario Pharmacist*, *Pharmacist's Letter*, *The Medical Letter*, notices of coming educational events or meetings, including OPA's Annual General Meeting, membership renewal applications) at your home
- No home fax number provided: You will not receive fax notices providing timely information on hot topics (e.g. SARS, Ontario Drug Benefit updates) at your home
- No birth date: OPA will not be able to determine if you are 65 or more years of age and eligible for the "Supporting Membership" category

Security of your personal information

What safeguards does the OPA have in place?

To ensure that the personal information you provide OPA is maintained confidential, OPA has developed processes and procedures to keep it safe and secure. The safeguards OPA has in place include:

Physical: Locked filing cabinets

Technological: Password-protected computers/files

Administrative: OPA employees are trained in the importance of safeguarding your personal information from loss and unauthorized access.

Contractual: The OPA has contracts in place with independent third parties that restrict them to using personal information *only* for the purposes of providing OPA’s services, programs and publications to you.

OPA website, www.opatoday.com: The OPA has worked hard to develop a website that provides you with access to information that is timely and beneficial to your practice, while protecting the personal information you provide OPA. The OPA cautions you, as a user, that you provide your information voluntarily and with an understanding of the limits to what can be secured without using encryption and other such mechanisms.

Links to other websites: www.opatoday.com may contain links to other websites. The OPA is not responsible for the practices or the content of such websites, and OPA recommends that you verify the security and privacy policy of any website before providing your personal information.

Accessing and changing your personal information

Accessing your personal information

You have the right to access and verify your personal information and to be told with whom OPA has shared your personal information. Accordingly, upon your written request to the Privacy Officer, the OPA will inform you in a timely manner and at minimal or no cost to you, of the nature of the personal information about you in OPA’s custody and control, of the use OPA has made of that information and of the parties to whom and which OPA has shared your personal information, and OPA will provide you access to that information except where such access is prohibited by law or OPA is permitted to provide access through a third party. At the time of your written request to the OPA’s Privacy Officer, the Privacy Officer will need specific information from you to verify your identity, in order to provide you with access to the personal information about you that OPA holds.

Changing your Personal Information

The OPA is committed to maintaining the accuracy of your personal information for the identified purpose(s). Please notify the OPA Privacy Officer in writing of any inaccuracies, corrections or changes as frequently as you wish. The OPA will make the appropriate changes and, upon your request, provide you with a copy of the corrected information.

Contact Privacy Commissioner of Canada

112 Kent Street
Ottawa, ON K1A 1H3

www.privcom.gc.ca
email: infor@privcom.gc.ca
Phone: (613) 995-8210
Toll-Free: 1-800-282-1376
Fax: (613) 947-6850
TTY: (613) 992-9190

Contact Us

Contact our Privacy Officer with any questions, concerns, or complaints about your privacy or personal information.

Privacy Officer
Ontario Pharmacists' Association
23 Lesmill Road #301
Toronto, Ontario
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by e-mail at privacy@opatoday.com
by telephone: 416-441-0788 or 877-341-0788
by fax: 416-441-0791

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