

Sharon McCann Counselling & Hypnotherapy
Personal Information Protection and Privacy Policy
In effect as of October 1, 2019

Sharon McCann Counselling & Hypnotherapy is committed to providing my clientele with exceptional service. As providing this service may involve the collection, use and disclosure of some personal information about my clientele, protecting their personal information is one of my highest priorities.

While I have always respected my clienteles' privacy and safeguarded their personal information, I have strengthened my commitment to protecting personal information as a result of British Columbia's Personal Information Protection Act (PIPA; see <http://www.bclaws.ca>). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

I will inform my clientele of why and how I collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy (Policies 1-8), in compliance with PIPA, outlines the principles and practices I will follow in protecting clienteles' personal information. My privacy commitment includes ensuring the accuracy, confidentiality, and security of my clienteles' personal information and allowing my clientele to request access to, and correction of, their personal information.

PIPA Definitions

- Personal Information – means information about an identifiable individual. Personal information does not include contact information.
- Contact information – means information that would enable an individual to be contacted and includes name, telephone / mobile number, and email. Contact information is not covered by PIPA.
- Privacy Officer – means the individual designated with the responsibility for ensuring that Sharon McCann Counselling & Hypnotherapy complies with this policy and PIPA. For this business, the Privacy Officer is Sharon McCann.

Privacy Policy

The Privacy Policy of Sharon McCann Counselling & Hypnotherapy concerns the collection of clientele contact information (name, telephone / mobile number, and email) not covered by PIPA. I will collect clientele contact information only with the consent, written or electronic, of clientele, and only for the stated purpose of collection. This information will be protected, used and disclosed in the same manner as described in Policies 1-4, 6 below.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the clientele voluntarily provides his or her personal information for those purposes, I will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 I will only collect personal information that is necessary to fulfill the following purposes (to verify identity, I may collect name, home address, telephone / mobile number, email, and birth date):
 - To provide counselling and hypnosis therapies and services;
 - To enrol clientele in workshops or events;

- To send out information about workshops or events;
- To ensure a high standard of service to my clientele;
- To meet regulatory requirements.

Policy 2 – Consent

- 2.1 I will obtain clientele consent to collect, use or disclose personal information (except where, as noted below, I am authorized to do so without consent).
- 2.2 Consent can be provided in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the clientele voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where clientele is given notice and a reasonable opportunity to opt-out of his or her personal information being used for the marketing of new services and the clientele does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clientele can withhold or withdraw their consent for Sharon McCann Counselling & Hypnotherapy to use their personal information in certain ways. A clientele’s decision to withhold or withdraw their consent to certain uses of personal information may restrict my ability to provide a particular service. If so, I will explain the situation to assist the clientele in making the decision.
- 2.5 I may collect, use or disclose personal information without the clientele’s knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the personal information is available from a public service, e.g., a telephone directory);
 - When I require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect myself from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law.

Policy 3 – Using and Disclosing Personal Information

- 3.1 I will only use or disclose clientele personal information where necessary to fulfill the purposes identified at the time of collection by consent.
- 3.2 I will not use or disclose clientele personal information for any additional purpose unless I obtain consent to do so.
- 3.3 I will not sell clientele lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If I use clientele personal information to make a decision that directly affects the clientele, I will retain that personal information for at least one year so that the clientele has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, I will retain clientele personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 I will make reasonable efforts to ensure that clientele personal information is accurate and complete where it may be used to make a decision about the clientele or disclosed to another organization.

- 5.2 Clientele may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, I will correct the information as requested or required, and send the corrected information to any organization to which I disclosed the personal information in the previous year. If the correction is not made, I will note the clientele's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 I am committed to ensuring the security of clientele personal information to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that clientele personal information is appropriately protected:
 - the use of locked filing cabinets;
 - physically securing the location where personal information is held;
 - the use of user IDs, passwords, encryption, firewalls as provided through commercial website hosting, privacy software and browsers;
 - restricting others' access to personal information as appropriate.
- 6.3 I will use appropriate security measures when destroying clientele's personal information such as shredding documents and deleting electronically stored information.
- 6.4 I will continually review and update my security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Clientele Access to Personal Information

- 7.1 Clientele have a right to access their personal information, subject to limited exceptions as stated in section 23 of PIPA, including when disclosure would reveal personal information about another individual, and his or her health and safety concerns.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to Privacy Officer Sharon McCann.
- 7.3 Upon request, I will also tell clientele how I use their personal information and to whom it has been disclosed if applicable.
- 7.4 I will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, I will inform the clientele of the cost and request further direction from the clientele on whether or not I should proceed with the request.
- 7.6 If a request is refused in full or in part, I will notify the clientele in writing, providing the reasons for refusal and the recourse available to the clientele.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer

- 8.1 Privacy Officer Sharon McCann is responsible for ensuring Sharon McCann Counselling & Hypnotherapy's compliance with this policy in whole and PIPA.
- 8.2 Clientele should direct any complaints, concerns or questions regarding Sharon McCann Counselling & Hypnotherapy's compliance in writing to her. If she is unable to resolve the concern, clientele may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Sharon McCann: mobile: 250-703-3724; email: hypno.mccann@gmail.com.