

Privacy Policy

Effective date: March 23, 2026

Last Updated: April 8, 2026

Our Commitment to Your Privacy

Your privacy is of utmost importance to us. This Privacy Policy describes how we collect, use, protect, and handle your personal information and personal health information in accordance with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy legislation in Nova Scotia.

Our Core Privacy Promise:

We will not release, sell, rent, share, or disclose your personal information or personal health information to any third party without your express written permission, except as required by law or in emergency situations as described in this policy.

No mobile information, including text messaging originator opt-in data and consent information, will be shared with any third parties or marketing affiliates for marketing or promotional purposes.

Scope of This Policy

This Privacy Policy applies to:

- Information collected through our business website
- Information collected through our VoIP phone number
- Information collected during in-person consultations and appointments
- Information collected through email, text, or other electronic communications
- All personal and health information related to our osteopathic care services

Definitions

Personal Information: Information about an identifiable individual, including name, address, phone number, email address, date of birth, and financial information.

Personal Health Information (PHI): Information about an identifiable individual relating to their physical or mental health, health history, healthcare provision, or payments for healthcare services.

What Information We Collect

Information You Provide Directly

We may collect the following types of information when you:

- Contact us via our website contact form or VoIP phone number

- Book an appointment or consultation
- Receive our osteopathic care services
- Subscribe to newsletters or communications
- Complete intake forms or health questionnaires

This information may include:

- Full name and preferred name
- Contact information (phone number, email address, mailing address)
- Date of birth and age
- Health history and current health concerns
- Previous treatments and therapies
- Current medications and supplements
- Lifestyle information relevant to treatment
- Emergency contact information
- Payment and billing information
- Insurance information (if applicable)

Information Collected Automatically

When you visit our website, we may automatically collect:

- IP address
- Browser type and version
- Device information
- Pages visited and time spent on pages
- Referring website
- General location information (city/region)

Information from VoIP Phone Calls

When you contact us via our VoIP phone number, we may collect:

- Phone number (caller ID)
- Date and time of call
- Call duration
- Voicemail messages (if left)

Note: We do not record phone conversations without your explicit consent. If call recording is used for quality assurance or training purposes, you will be notified at the beginning of the call and given the option to decline.

How we use your information

Use of Personal Information

We use your personal information only for the following purposes:

- To communicate with you about appointments, services, and inquiries
- To provide you with information you have requested
- To process payments and maintain financial records
- To send appointment reminders and follow-up communications
- To improve our services and client experience
- To comply with legal and regulatory requirements
- To send via email newsletters or educational materials (only with your consent, and you may unsubscribe at any time)

No mobile information, including text messaging originator opt-in data and consent information, will be shared with any third parties or marketing affiliates for marketing or promotional purposes.

Use of Personal Health Information

We use your personal health information solely to:

- Provide, plan, and manage your osteopathic care
- Assess your health needs and recommend appropriate treatments
- Document your care in your health record
- Consult with other healthcare practitioners (only with your express written consent)
- Process insurance claims (only with your authorization)
- Comply with legal obligations, such as reporting requirements

Your Consent and Control

Express Permission Required

We will NOT share, sell, rent, or disclose your personal information or personal health information to third parties without your express written permission, except in the limited circumstances described in the "When We May Disclose Information Without Consent" section below.

No mobile information, including text messaging originator opt-in data and consent information, will be shared with any third parties or marketing affiliates for marketing or promotional purposes.

How We Obtain Consent

We obtain your consent in the following ways:

- **Express consent:** You provide clear, explicit permission verbally or in writing

- **Implied consent:** Your voluntary provision of information for specific purposes (e.g., providing your phone number to book an appointment)
- **Opt-in consent:** You actively choose to receive communications or share information with specific parties.

For sensitive personal health information, we always obtain express consent.

Withdrawing Consent

You have the right to withdraw your consent at any time, subject to legal and contractual restrictions. To withdraw consent:

- Contact us using the information provided at the end of this policy
- Specify which consent you are withdrawing
- Understand that withdrawing consent may limit our ability to provide certain services

We will inform you of the implications of withdrawing consent and will comply with your request within a reasonable timeframe.

When We May Disclose Information Without Consent

In limited circumstances, we may disclose your information without your consent as permitted or required by law:

Legal Requirements

- When required by court order, subpoena, or warrant
- When required by federal or provincial legislation
- When required to report to regulatory colleges or professional associations
- When required for public health reporting (e.g., communicable diseases)

Emergency Situations

- To prevent or respond to an emergency threatening life, health, or safety
- To contact emergency contacts in urgent situations

Business Operations (Limited Circumstances)

- To service providers who assist us with business operations (e.g., IT support, payment processing, appointment scheduling software), who are contractually bound to maintain confidentiality and use information only for specified purposes
- For legal advice from our lawyers, who are bound by solicitor-client privilege
- For accounting and bookkeeping services, who are contractually bound to confidentiality

In all cases, we disclose only the minimum information necessary and ensure third parties are bound by confidentiality obligations.

How We Protect Your Information

We implement comprehensive safeguards to protect your personal information and personal health information:

Physical Safeguards

- Secure storage of paper records in locked filing cabinets
- Restricted access to areas containing client files
- Secure disposal of records through shredding or secure destruction services

Technical Safeguards

- Encryption of electronic health records and sensitive data
- Secure, password-protected computer systems
- Firewall and antivirus protection
- Regular software updates and security patches
- Encrypted VoIP phone system
- Secure website with SSL/TLS encryption (HTTPS)
- Regular data backups with secure, encrypted storage

Administrative Safeguards

- Privacy training for all staff members
- Confidentiality agreements with all employees and contractors
- Access to information limited to authorized personnel on a need-to-know basis
- Regular review and update of privacy policies and procedures
- Incident response plan for privacy breaches

Third Party Service Providers and Cross Border Data Storage

We use third-party services to support our operations, including Ooma VoIP for phone services, Google and Apple email platforms, and GOrendezvous, a Canadian-based clinic management platform, for storing and managing confidential health information. Some of these services may store or process certain information in other countries, meaning that data may be subject to the laws of those jurisdictions and, in some cases, may be accessible to local authorities (such as government, courts, or law enforcement). We choose providers that implement security and privacy safeguards consistent with PIPEDA and applicable Canadian privacy standards, and we ensure that any personal or personal health information held in these systems is protected by contractual confidentiality and appropriate technical protections.

Website-Specific Privacy Practices

Cookies and Tracking Technologies

Our website may use cookies and similar technologies to:

- Remember your preferences
- Improve website functionality
- Analyze website traffic and usage patterns

You can control cookies through your browser settings. Disabling cookies may affect website functionality.

We do not use cookies to track your activity across other websites or to serve targeted advertising.

Third Party Services

Our website may use third-party services such as:

- Website hosting providers
- Analytics services (e.g., privacy-focused analytics)
- Email service providers for newsletters
- Online appointment booking systems

We select service providers who maintain strong privacy and security standards and enter into agreements requiring them to protect your information.

Links to Other Websites

Our website contains links to third-party websites. We are not responsible for the privacy practices of these external sites. We encourage you to review their privacy policies.

VoIP Phone Number Privacy

Our VoIP (Voice over Internet Protocol) phone system:

- Uses encrypted connections to protect call content
- Stores caller ID and call logs securely
- Does not share phone numbers with third parties for marketing purposes
- Maintains voicemail messages securely and deletes them according to our retention schedule

Retention and Disposal of Information

We retain your personal information and personal health information only as long as necessary to fulfill the purposes for which it was collected and to meet legal and regulatory requirements.

Retention Periods

- **Client health records:** Minimum 10 years from the date of last service (longer if required in the future by provincial regulation or professional guidelines). Please note: Records created prior to January 1, 2025, were retained only if the file had been active within the three years preceding our electronic medical record system transition in late 2024. From January 1, 2025 onward, all client health records are retained for a minimum of 10 years from the date of last service.

- **Financial records:** 7 years as required by tax legislation
- **Marketing communications:** Until you unsubscribe or withdraw consent
- **Website analytics data:** Maximum 26 months

Secure Disposal

When information is no longer needed, we dispose of it securely:

- Paper records are shredded or destroyed using secure document destruction services
- Electronic records are permanently deleted using secure data erasure methods
- Physical media (USB drives, hard drives) are destroyed or degaussed

Your Privacy Rights

Under PIPEDA and applicable provincial legislation, you have the following rights:

Right to Access

You have the right to request access to your personal information and personal health information that we hold. We will provide you with:

- A copy of your information
- Information about how we use your information
- Information about who we have disclosed your information to (if applicable)

Right to Correction

If you believe your information is inaccurate or incomplete, you have the right to request corrections. We will:

- Correct the information if we agree it is inaccurate or incomplete
- Make a note on the record if we disagree, documenting your request and our response

Right to Request Restrictions

You may request that we limit how we use or disclose your information. We will accommodate reasonable requests where possible.

Right to File a Complaint

If you believe we have violated your privacy rights, you have the right to file a complaint with:

- Our Privacy Officer (contact information below)
- The Office of the Privacy Commissioner of Canada: 1-800-282-1376 or www.priv.gc.ca
- The Nova Scotia Freedom of Information and Protection of Privacy Review Officer (if applicable to your situation)

How to Exercise Your Rights

To exercise any of your privacy rights:

1. Submit your request in writing to our Privacy Officer (contact information below)
2. Provide sufficient detail to allow us to identify you and locate your information
3. Provide proof of identity to protect against unauthorized access
4. Specify the information or records you wish to access or correct

We will respond to your request within 30 days or notify you if we require an extension. There is no fee for most requests, though we may charge reasonable costs for extensive requests or copying fees.

Privacy Breach Notification

In the event of a privacy breach that poses a real risk of significant harm to you, we will:

- Notify you as soon as feasible by the most direct means available
- Notify the Office of the Privacy Commissioner of Canada
- Provide information about what happened, what information was involved, and what steps we are taking
- Advise you on steps you can take to protect yourself

We maintain detailed records of all privacy breaches and conduct investigations to prevent future incidents.

Children's Privacy

Osteopathic care is appropriate for and offered to individuals of all ages, including children. We do not provide services to minors (individuals under the age of 19 in Nova Scotia) without the express consent of a parent or legal guardian.

When we provide osteopathic care to minors, we collect personal and personal health information about the child only with parental or guardian consent. The parent or legal guardian has the right to access, review, and request corrections to the child's health information.

We do not knowingly collect personal information from children through our website, email, or other electronic communications without parental consent. If we become aware that we have collected information from a child without appropriate parental consent, we will take steps to delete it.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect:

- Changes in our practices
- Changes in our privacy legislation
- New technologies or services
- Client feedback

When we make significant changes, we will:

- Update the “Last Updated” date at the top of this policy
- Post the revised policy on our website
- Notify you by email if you have provided your email address (for material changes)
- Obtain new consent where required by law

We encourage you to review this Privacy Policy periodically.

Contact Us - Privacy Officer

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact our Privacy Officer:

Truro Osteopathy

Privacy Officer: Kimberley Benedict, DO(MP)

29 Ritchie Barnhill Drive

Truro, Nova Scotia

B2N 6P5

Phone: (902) 890-1163 or (782) 302-0042

Fax: (902) 418-4933

Email: truro.osteopathy@icloud.com or osteopathy.truro@gmail.com

We will respond to your inquiry within a reasonable timeframe, typically within 30 days.

Consent and Acknowledgment

By using our website, contacting us via phone, or receiving our services, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and disclosure of your information as described herein.

For personal health information, we will obtain your express written consent on our intake forms and consent documents.

Thank you for trusting Truro Osteopathy with your health care and personal information. Protecting your privacy is our priority.