

## DOCTORS NOVA SCOTIA

### POLICY RESPECTING THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

#### ***Why a Privacy Policy?***

Doctors Nova Scotia (DNS) values the privacy of its members and has enacted this Privacy Policy to put in writing its current practices and to be transparent about its efforts to respect members' privacy. This policy applies to all personal information (excluding DNS employee information and information in the public domain) that has been and will be collected, used and/or disclosed by DNS.

#### ***What do we mean by "Personal Information"?***

"Personal Information" is information about an identifiable individual. It does not include information such as business addresses and business telephone numbers, which can be found in the public domain by accessing publications like telephone or professional directories. Nor does it include personal health information as defined by the Nova Scotia *Personal Health Information Act*.

#### ***What types of Personal Information does DNS collect, use, retain and/or disclose?***

DNS collects, uses, retains and may disclose Personal Information about its members and about individuals who purchase DNS products and services and/or attend DNS sponsored events and seminars. DNS may also collect Personal Information about a DNS member's family members. The specific information included may vary depending on the applicable benefit, product or service being sought.

The Personal Information collected may include a person's name, home address, telephone number and email address. For members, DNS may also collect date of birth, gender and Social Insurance Number. For persons who have attended an event organized by DNS or paid annual membership fees, DNS may also collect credit card or banking information.

#### ***From whom does DNS receive Personal Information?***

The vast majority of the Personal Information DNS receives is provided by members when they complete or renew their DNS membership application, when they complete an application for one or more of the DNS benefit programs, or when they apply for insurance made available through DNS.

In addition, DNS collects Personal Information directly from other organizations, including the College of Physicians and Surgeons of Nova Scotia; the province's Department of Health and Wellness; the agency or agencies retained by the province to administer its Medical Services Insurance program; the Canadian Medical Association (CMA); the Canadian Medical Protective Association; and Dalhousie University's Faculty of Medicine.

### ***Why does DNS collect and use Personal Information?***

DNS will collect, use, retain and may disclose Personal Information about members for the following purposes:

- 1) To determine eligibility for membership;
- 2) To determine eligibility for the services of DNS's preferred third-party suppliers;
- 3) To provide and to communicate information about DNS member benefits and services (e.g., the delivery of publications, advocacy, career placement assistance, etc.);
- 4) To represent individual physician's interest, financial, contractual and otherwise, through advocacy, negotiations and arbitration;
- 5) To facilitate the administration of the Medical Services Insurance program by the provincial Department of Health and Wellness and the agency or agencies retained by the Province in connection with those programs;
- 6) To develop and market products and services tailored to the interests of members and the purchasers of DNS products and services;
- 7) To update the contact information in the DNS database;
- 8) To assist with the maintenance of membership and client contact information;
- 9) To conduct surveys of the physician population in order to analyze for statistical and resource purposes such issues as the demographics of physician human resources; and
- 10) To engage members and physicians in DNS's policy development process.

DNS may also collect Personal Information about a physician's family for insurance purposes or about other individuals who are eligible to participate in DNS programs.

### ***When and to whom does DNS disclose Personal Information?***

DNS does not sell Personal Information. DNS does not share, exchange or otherwise disclose Personal Information except as outlined in this Policy, or as required or permitted by law. DNS may disclose Personal Information about members to the College of Physicians and Surgeons, the CMA and its subsidiaries, and to the provincial Department of Health and Wellness and the agency or agencies retained by the province to administer its Medical Services Insurance program.

In addition, DNS may disclose Personal Information to third parties and organizations that have contracted with DNS to help us provide products and distribute information on services. For example, DNS may outsource the mailing list function for its publications to an organization whose purpose is to distribute the publication on behalf of DNS. In such instances, DNS takes contractual precautions to ensure that:

- the Personal Information is protected by these third parties at a level comparable to DNS's own measures; and
- any further use of the Personal Information is strictly prohibited.

Except for the purposes outlined above, or where required by law, DNS will not collect, use or disclose your personal information without your consent. For example, a request from a member or section for the personal information of another member(s) is considered outside the purposes for which personal information is collected and therefore will not be disclosed without the member's consent.

### ***What if you object to DNS's collection, use or disclosure of Personal Information?***

Subject always to restrictions required by law, and pursuant to the agreements in place with respect to the administration of the provincial Medical Services Insurance program, you may at any time withdraw your consent to the further collection, use or disclosure of your Personal Information for some or all of the purposes identified in this policy. You need only provide DNS with reasonable written notice of your intention and the details of your withdrawal. For instance, if you do not wish to have contact or demographic information shared with the CMA, DNS will respect your choice.

Please note, however, that your objection to disclosure of certain information may mean that DNS will be unable to continue to provide you with some products or services. For example, if you object to the sharing of your CMA membership status with CMA's subsidiaries, you will not be eligible to benefit from their products or services, as MD Management has to confirm your CMA membership status in order to offer you financial services.

It is your responsibility to contact DNS and/or the CMA to determine how an objection to the collection, use and disclosure of Personal Information might affect the services supplied.

### ***Accuracy of and access to your Personal Information***

DNS makes every reasonable effort to ensure the accuracy and currency of your personal information so that the association might fulfill the purpose for which the information was collected in the first place. Please advise us of any changes so we may better meet your needs.

You may challenge the accuracy and completeness of the Personal Information that is maintained by DNS. DNS will amend Personal Information when an individual successfully demonstrates inaccuracy or incompleteness.

To streamline your communications with DNS, some contact information (such as your address) is updated automatically. You may indicate that you do not wish DNS to perform these routine

updates. In addition, you may change and/or update some of your own membership information by accessing your profile via the secured members' side of doctorsNS.com.

To access your Personal Information held by DNS, please send a written request to the attention of the Chief Privacy Officer at 25 Spectacle Lake Drive. Except when the release of such information is legally prohibited, we will, as soon as practically possible, advise you in writing whether such Personal Information exists and the nature of this information. If DNS cannot release the requested Personal Information, we will provide you with the reasons for denying access.

### ***How secure is your Personal Information?***

DNS makes every reasonable effort to protect your Personal Information by implementing security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. DNS uses physical, organizational and technological measures as methods of protection. For instance, only a few DNS staff members have authorized access to sensitive information. An even smaller number can actually update your information. When credit card information is entered into the DNS database, it is encrypted and cannot be retrieved.

### ***How long does DNS retain Personal Information?***

DNS keeps Personal Information as long as it is required to fulfill the purposes identified above. Personal Information will be safely and securely destroyed when:

1. It is no longer required to fulfill the identified purposes;
2. The time necessary to allow an individual to exhaust any legal remedy that is provided for in applicable federal or provincial legislation has elapsed; and
3. It is no longer required under federal or provincial legislation.

### ***What if you have a question or concern about this Privacy Policy or DNS's privacy practices?***

You may address any questions or concerns relating to this Privacy Policy or DNS privacy practices to the Chief Privacy Officer at 25 Spectacle Lake Drive. For more information about your personal privacy rights, you may also review the Privacy Commissioner of Canada's website: [www.priv.gc.ca](http://www.priv.gc.ca).

### ***Changes to our Privacy Policy***

As part of our regular review of DNS policies and procedures, this policy may be changed from time to time.