L.H. Argatoff MD, FRCPC Y. Brierley MD, FRCPC J.S. Doyle MD, FRCPC
D.W. Lesack MD, FRCPC S. M. Tebbutt MD, FRCPC

# **Privacy Notice**

Effective date: 25/AUG/2022

Valley Medical Laboratories ("VML", we" or "us") is committed to protecting your personal information and respecting your privacy rights. This privacy policy relates to our collection, use, disclosure, retention, and protection of your personal information when you use our services, visit any of our lab locations or our website.

#### Overview

The following section is a high-level overview of VML's privacy management practices. You are encouraged to read this <u>Privacy Policy</u> in its entirety to ensure you have a full understanding of our privacy management practices.

In summary, we may:

- Collect your personal information from:
  - you directly
  - o your doctor or other health care providers involved in your care
  - o your provincial health card (i.e., BC Services Card)
  - o your interaction with our website
- Use your personal information:
  - o to help identify you
  - o to provide you with laboratory services
  - o to identify any medical history, allergies, medications that may be relevant to your visit
  - o to improve our internal policies and procedures, quality assurance practices and the functionality of our website (whenever possible we will use anonymized data for these purposes)
  - o for medical research purposes (with your consent)
- Share your personal information, including test results:
  - o with your doctor or other health care providers involved in your care
  - o with your prior knowledge (and when required, your consent)
  - o as required or permitted by law
- Retain your personal information:
  - o for as long as required to provide you with service
  - as required by law
  - o and always in compliance with our record retention schedule
- Protect your personal information using various safeguards including, but not limited to:
  - policies and procedures
  - staff training and communications
  - o technological solutions (i.e., firewalls, detection tools, authentication tools)
  - o physical deterrents (i.e., locks, alarms)

**Questions or concerns** about our privacy management practices or **requests for access to your personal information** can be raised to our Privacy Officer via:

Email:	Phone:	Mail: VML Privacy Officer
privacyofficer@vmlabs.ca	(250) 763-4813	#105 – 537 Leon Avenue
		Kelowna, B.C. Canada V1Y 6J5



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### Collection

VML may collect personal information required to provide you with our services. This may include your:

- Contact information (i.e., name, address, telephone number(s))
- Medical history (i.e., illnesses, injuries, operations, allergies, medications)
- o Demographics (i.e., date of birth, age, sex, gender, language preference)
- Test results
- Emergency contact information
- o Family doctor's contact information

We may also collect personal information related to our interaction with you. This may include:

- Communications (i.e., telephone recordings and transcripts, complaints)
- o Information collected during your interaction with our website via the placement of a cookie, such as:
  - IP address
  - Location info (e.g., GPS data)
  - Device data (e.g., device ID, device type)
  - Click stream data, browser history

#### Use

We may use identifiable personal information for the following purposes:

- o To verify your identity when you:
  - o book an appointment
  - o visit one of our lab locations
  - o contact us (i.e., by phone, by email)
- To provide you with laboratory services such as:
  - Verifying the test(s) to be performed/specimens to be drawn/taken
  - Matching your specimen(s) with your test result(s)
- o To identify any medical history, allergies, medications that may be relevant to your visit (i.e., latex allergy, history of fainting when having blood drawn)
- To improve the functionality of our website (i.e., based on calls to our customer support we may use your comments to troubleshoot issues with our website)

On an anonymous basis, we may use your information and laboratory samples to evaluate our own performance, to ensure quality, establish population based normal values, or to assess certain enhanced services.

Where we propose using your personal information for any other uses, we will we notify you first, unless otherwise permitted or prohibited by law.

### Disclosure

We may disclose your personal information:

- To your ordering physician and members of your health care team who are copied on your requisition, often referred to as members within your "circle of care"
- To provide you with our services (i.e., to invoice the provincial medical system, to allow you to access your results in My Care Compass)



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- To carrying out an investigation as a result of a court order, warrant, subpoena or summons or other purpose as permitted by law
- o To eliminate or reduce a significant risk of serious bodily harm to another person or group
- For research purposes (only with your consent), subject to restrictions and conditions such as use of only certain set of data to meet a research objective
- o If permitted or prescribed by law

There are also other instances when others request your personal information or test results. Examples include your employer, your lawyer, agencies such as the Ministry of Children and Family Services or members of your family. We will require your knowledge of the request, and your permission to release information before we report to anyone other than the health care providers directly involved in your care.

Disclosure outside of Canada - Requisition forms are scanned into our system using a trusted third-party optical character recognition (OCR) product. We do this to eliminate the need to retain hard copy requisition forms as part of our operational streamlining and privacy protection activities. As part of the scanning process requisition forms can be processed through the European Union (EU) where they are protected under the General Data Protection Regulation (GDPR), a regulation in EU law on data protection and privacy. They continue to be protected under the Personal Information Protection Act (PIPA) too. All requisition forms are encrypted in transit and are never at rest outside of Canada.

#### **Protection and Retention**

We will only keep your personal information for as long as required for the purposes we collected it. We have security, retention and destruction policies and procedures that ensure your personal information is protected and that our retention and destruction of your personal information is reasonable and in compliant with applicable laws. In addition, all staff are trained at the time of hiring and annually thereafter on our privacy and security policies, procedures, and protocols.

### Privacy on our Website

#### **Cookies**

Our website uses cookies to improve your online experience with our website. A cookie is a small file that is placed on the browser or device you are using. Our website specifically uses session cookies. These are temporary cookies that disappear once you leave our website or close your browser.

You can remove or turn off cookies through your browser (i.e., Internet Explorer, Safari, Chrome). Follow your browser's directions to learn how to do this.

## Links to third party websites

Our website contains hyperlinks to websites owned and operated by third parties (i.e., Net Check In, Google). These third-party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information you submit or that is collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.



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# Your rights

We want to help you understand your privacy rights and options so you can make informed decisions when using our services and website. We are required to collect certain information to provide you with services. We may also use some of your information as needed for normal business purposes (i.e., quality control, process improvement, website functionality). Finally, some information is optional - you can choose not to provide it from the start or can withdraw your permission at any time.

These are your privacy rights:

Your privacy right	Description	How to exercise your privacy right
Update your	We aim to keep your information	Phone: (250) 763-4813
personal	accurate and complete, so if your	Email: info@vmlabs.ca
information	circumstances change, please update your information with us promptly.	In person: at any of our <u>lab locations</u>
Request access to your personal information	You can request access to personal information we hold about you. There may be a small charge for doing so. You	Requests for access must be made in writing via:
	may correct the information if there are	Email: privacyofficer@vmlabs.ca
	any mistakes. Note: We may require you	Mailing address:
	to access some personal health	Valley Medical Laboratories
	information through the ordering	Attn: Privacy Officer
	physician.	105-537 Leon Ave
		Kelowna, B.C.
		V1Y 6J5
Make an inquiry or	If you have a question or concern with	Phone: (250) 763-4813
complaint	how we handle your information, we	Email: privacyofficer@vmlabs.ca
	want to know.	Mailing address:
		Valley Medical Laboratories
		Attn: Privacy Officer
		105-537 Leon Ave
		Kelowna, B.C.
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### Updates to this notice

We may modify this notice from time to time and will post the most current version online. If we revise it, updates will take effect 30 days later.

