

At Health Risk we are committed to our clients that have entrusted us with their business to ensure that we are protecting the privacy, confidentiality and security of their personal information at all times. As such, we have adopted a Privacy Guideline that directs each employee of Health Risk in their handling, safeguarding and accountability of all information collected.

The overall responsibility for ensuring our compliance with data privacy laws and these Privacy Guidelines rests with the President of Health Risk Services, who is our Privacy Officer.

What Is Personal Information?

“Personal Information” means any factual or subjective information concerning an identifiable individual. Information could include, but is not limited to, health and financial information. Personal information may be collected concerning a variety of individuals within a group or an individual life insured, beneficiaries, and employees or contractors.

Personal Information can be collected in a variety of forms, including written correspondence, electronic communications and records, video or audio recordings and photographs.

Examples of Personal Information include information concerning an individual's name, age, sex, health, personal characteristics or personal and financial circumstances. Personal Information can also include such things as identification numbers (such as SIN or employee numbers), banking and income information, employment records, credit records and medical information.

Personal Information does not include the name, title or business address, telephone number or e-mail address of employees of an organization.

Who Must Comply With The Privacy Guidelines?

Health Risk Services, its directors, officers and employees, and its licensed representatives and other persons and organizations who act for, or on behalf of Health Risk, are required to comply with these Privacy Guidelines.

Who Has Access To Personal Information?

Access to Personal Information is restricted to directors, officers, employees, licensed representatives, other persons or organizations acting for, on behalf of Health Risk, who need the information in order to provide services to the client or Health Risk.

10 Privacy Principles:

In order to ensure that your Personal Information is respected and protected, Health Risk implements the 10 Privacy Principles set out in Schedule 1 of the Canadian Federal - Personal Information Protection and Electronic Documents Act as follows:

1. ACCOUNTABILITY

Health Risk is responsible for personal information in its possession and control, including information that may be transferred to a service provider or Insurance Company. Health Risk has established these Privacy Guidelines, procedures and practices, to safeguard such personal information.

2. PURPOSES FOR COLLECTION OF PERSONAL INFORMATION

Health Risk will identify to you the purposes for which we are collecting personal information from you either before or at the time of collection.

3. CONSENT FOR COLLECTION & USE

Health Risk will collect, use or disclose personal information ONLY with the consent of the customer/client, except in certain circumstances permitted or required by law. If there are circumstances where the information to be disclosed or shared is of a sensitive nature such as medical records or income records, we will obtain express consent. If the collected information is to be used for a new purpose after the original collection, we will obtain an additional consent.

Sometimes consent may be obtained from an authorized representative, such as a legal guardian or person holding power of attorney. Seeking consent may be impossible or inappropriate when the individual is a minor, seriously ill, or otherwise incapacitated dependent, so consent can be granted by the Legal Parent or Guardian.

Implied consent may be inferred in circumstances where the information is less sensitive and consent to collection, use or disclosure can be reasonably inferred.

Consent to the collection, use, or disclosure of personal information may be express or implied, as appropriate. Individuals may withdraw their consent at any time with reasonable notice, subject to legal or contractual restrictions and considerations. The individual withdrawing consent will be advised by Health Risk of the implications of such withdrawal, which may include termination of a policy, termination of benefits or inability to process a claim.

4. COLLECTION OF PERSONAL INFORMATION

Health Risk will not collect personal information indiscriminately. Both the amount and the type of information collected shall be limited to that which is reasonably necessary to fulfill the purposes identified. Personal Information may be collected directly from the Individual or a Company, and may, with consent or as otherwise allowed by law, be collected from other sources.

5. LIMITING USE, DISCLOSURE AND RETENTION

Health Risk will not use or disclose personal information for purposes other than those for which it was collected, unless such use or disclosure is required or allowed by law. This may include use or disclosure in order to protect Health Risk's interests in civil proceedings and in proceedings involving criminal activity, fraud or misrepresentation.

Health Risk retains Personal Information only as long as necessary to fulfill the identified personal or business purpose, or as otherwise required or allowed by law. When Personal Information no longer is required to be retained, Health Risk will ensure that it is destroyed in a secure manner according to our record retention and destruction policies and procedures.

Health Risk does not sell and/or trade customer lists and/or Personal Information to third-party companies and organizations.

6. ACCURACY

Health Risk will ensure that Personal Information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

The extent to which personal information shall be updated will depend upon the use of the information, taking into account the interests of the individual. Information will be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about the individual.

Health Risk will not routinely update personal information unless provided by the individual and if such process is necessary to fulfill the purposes for which the information was collected.

7. SAFEGUARDING PERSONAL INFORMATION

Health Risk will protect the security and confidentiality of Personal Information with safeguards appropriate to the sensitivity of the information.

Health Risk has implemented security safeguards and appropriate training to employees in order to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

Health Risk uses methods of protection inclusive of physical, organizational and technological measures designed to limit access to authorized persons, ensure the integrity of the information and protect it from unauthorized use or disclosure.

Health Risk also includes steps to ensure that all third parties with whom we are contracted with and who may be required to handle Personal Information have implemented comparable security measures.

8. OPENNESS

Health Risk will make readily available to individuals specific information about its policies and practices relating to the management of Personal Information. Should you have any questions regarding the Privacy Guidelines as maintained by Health Risk, please contact us to discuss them with you.

9. CLIENT/INDIVIDUAL ACCESS TO PERSONAL INFORMATION

Health Risk, upon request, will inform an individual:

- whether or not we hold Personal Information about them.
- we will permit access to all Personal Information.
- we will disclose an accounting of the use made of this information including any disclosure to third-parties.

An individual will be able to challenge the accuracy and completeness of their Personal Information on file and after successfully demonstrating the inaccuracy or incompleteness of the information held by us, have it amended as appropriate.

Health Risk, in certain circumstances, may not be able to provide access to all of the Personal Information it holds about an individual. Exceptions to the access requirement will be limited and specific, and the reasons for denying access will be provided to the individual upon request. Exceptions may include:

- information that is prohibitively costly to provide,
- information that contains references to other individuals
- information that cannot be disclosed for legal, security, or commercial proprietary reasons,
- information that has been obtained in the course of an investigation of a potential breach of contract or fraud,
- information that is subject to privilege.

Health Risk will respond to an individual's request within a reasonable time and at no cost to the individual. If the individual requests copies of any of the documents in the Health Risk files, a reasonable fee may be charged for duplication. The information will be provided or made available in a form that is generally understandable and complies with manners of protecting the information. Depending upon the nature of the information challenged, amendment may mean the correction, deletion or addition of information.

10. CONCERNS, INQUIRIES OR REQUESTS

Health Risk clients/individuals may address a challenge concerning compliance with this policy or any concerns, inquiries or requests related to the privacy of their Personal Information to:

Compliance Officer
Health Risk Services Inc.
#50, 12221 – 44th Street S.E.
Calgary, AB T2Z 4H3
Phone: 403.236.9430 or 1.877.236.9430
Fax: 403.236.9420
Email: info@healthrisk.ca