



## Patient Privacy, Disclosure, and Consent Form

### Instructions to the Practice:

- The “Privacy Consent and Disclosure Letter” is to be signed by your existing patients upon their return visit to your Practice and by new patients upon their first visit to your Practice. This is a regulatory requirement as it is necessary to obtain patient consent to use their personal health information and to disclose transfer of ownership to all patients. These forms are designed to do just that.
- New Privacy Codes are to be posted on the Office’s website, and laminated copies should be attached to clipboards to be used by patients when signing these Consent forms. Please note that there is a different “Website” policy for this purpose which includes some additional information on Google Analytics and things of that nature.
- Adults may sign for themselves and for children who are incapable of consenting and patients of the Practice. Mature minor children, and all people above the age of 18 must sign for themselves.
- Please place a signed copy in the patient’s file (hard copy or electronic). If a patient receives a copy of the agreement, that should be noted in the chart, even if they do not provide the clinic with a signed copy. This may occur where a patient takes a physical copy of the privacy form but asks to review it at a later time.
- A notation that a copy of this Consent Form has been signed and the date of signing, are to be documented either on the exterior of the patient file or in the patient’s electronic profile to ensure all patients have signed a consent and to help prevent duplication of signing
- Speaking notes to advise your existing patients of why this form is necessary, may be presented as follows:

*There are frequent changes to Canadian privacy and personal information rules and regulations. In recognition of the importance of your privacy and personal information and to ensure we continue to meet the standards required, we have updated our privacy code and our patient consents forms to reflect these changes. If there are any future updates, we will be sure to let you know. We encourage all our patients to be active participants in their own healthcare and to understand their rights and be aware of how their information is used. At our clinic, your information is used so that we can provide you with excellent healthcare and a fantastic patient experience.*



## **Privacy Consent and Disclosure Letter**

### **Dear Valued Patient**

Thank you for trusting us to look after your oral health care needs. We consider it a privilege to care for you and we always work hard to maintain your trust and confidence. Part of maintaining your trust means ensuring you know about our practice and how we utilize and safeguard your personal health information.

### **A little bit about our practice**

At Oral Surgery Group of Winnipeg - North Office, all clinical dentistry services are performed by dental professionals in good standing with Manitoba Dental Association. We partner with North Winnipeg Oral Health Services to provide administrative and clinical support services to our patients – allowing our dental professionals to focus on your oral health care needs. All clinical support services are provided under the clinical supervision and control of dental professionals.

Oral Surgery Group of Winnipeg - North Office and North Winnipeg Oral Health Services are two separate business entities, each providing different services to you (clinical dentistry by one, and administrative and clinical support by the other). For ease of administration and payment, we may give you a single, joint invoice. We want you to know that one or more dental professionals at Oral Surgery Group of Winnipeg - North Office may have a financial interest in North Winnipeg Oral Health Services. This type of business structure is common within the dental profession. We just thought you should know.

Attached you will find our office's privacy policy. By signing, you acknowledge that you have read and understood the information provided in the policy and that you consent to the practices it describes. Feel free to ask us any questions you might have.

Thank you very much for the privilege of assisting you with your oral health care needs. We look forward to caring for your smile.

**Patient (Guardian) Signature:**

**Date:**

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## **Consent to Use and Store Personal Health Information**

At Oral Surgery Group of Winnipeg - North Office we are committed to ensuring a professional, safe and trusted office environment. To provide you with optimized oral health care and excellent service we use, store and analyze certain personal health information that we (a) collect from you, (b) generate through diagnostic testing and treatment planning, or (c) receive from your other health care providers.

We will not collect, disclose, or use any of your information without your knowledge or consent. Only persons with a clinical (or related administrative) need to know a piece of information will be granted access to that information. In the same vein we embrace the principle that only the necessary amount of information shall be disclosed for any task or function. Our staff are trained on the importance of keeping your information safe, secure and confidential.

We have designated Julian Perez as our privacy officer. You can reach Julian Perez at [julian.perez@dentalcorp.ca](mailto:julian.perez@dentalcorp.ca) should you have any questions or concerns We appreciate your feedback.

### **What information do we collect?**

There are a few categories of information we normally collect. The first is personal information such as name, address, other contact information, insurance information, and financial/billing information, which may include credit card numbers and other such information. To the extent we collect credit card information, it is done in compliance with Payment Card Industry Data Security Standards (PCI DSS).

We also collect and generate personal health information including such things as:

- Medical history
- Medications
- Dental history
- Records of dental visits, recall exams and appointment scheduling
- Results of diagnosis and testing
- Study models, odontograms and impressions
- Treatment recommendations, treatment plans and progress notes
- Records of consent conversations and when appropriate, signed consent forms
- Referral/Specialists reports and recommendations



## **How do we use your information?**

We believe it is important that you know how we use your information. To that end, we only collect, use and disclose information about you for the following purposes:

- To deliver safe and efficient patient care
- To ensure high-quality service
- To assess your health needs
- To advise you of treatment options
- To provide you with information about services offered at our clinic
- To inform you of changes to our office policies or hours
- To establish and maintain communication with you, including to schedule and remind you of appointments
- To enable us to contact you
- To communicate with other health care providers, including specialists and general dentists involved in your care
- To allow us to efficiently follow-up for treatment, care and billing
- For teaching and demonstrating purposes on an anonymous basis
- To complete and submit dental claims and estimates for third party adjudication and payment
- To comply with legal and regulatory requirements, including communication with the provincial dental regulator, privacy commissioner or any statutory review board as required under legislation
- To comply with a court order in the event of legal proceedings
- To invoice for goods and services
- To process credit card, cash and personal cheque payments
- To collect unpaid accounts
- To send you surveys relating to our business and services
- For internal management purposes, such as resource planning, policy development, quality assurance, and human resource management
- To comply with regulatory requirements and the law generally
- In the event that a decision to sell the practice is made:
  - To permit potential purchasers to evaluate the dental practice
  - To allow potential purchasers to conduct an audit in preparation for a sale

While the above list is rather long, we believe it better to be over-inclusive. Many of the items listed above are unlikely to apply to you.

Before personal information is used or disclosed for a purpose not previously identified, we will advise you of this new purpose or disclosure and will only proceed with your consent.



## **Electronic Communication**

When we communicate with you, we may communicate via electronic means, such as e-mail or SMS text message. We strive to ensure that our Commercial Electronic Messages (“CEMs”) are sent with consent, identifying information and unsubscribe mechanisms. We require all CEMs from our Office to be in compliance with privacy and anti-SPAM laws. If and when we communicate with you using CEMs, you can opt out of receiving such messages by following the “Unsubscribe” link included at the bottom of such messages or by contacting our office practice manager. Any questions or concerns with respect to CEMs from our Office may be addressed to [jstrawn@winnipegoms.ca](mailto:jstrawn@winnipegoms.ca) or 204-338-3933. If our Office inadvertently sends out a CEM without consent, we commit to investigating every such instance and assisting the employee(s) or managers involved with renewing their understanding and awareness of our compliance responsibilities.

## **How is your information stored and who has access to it?**

Your information may be kept in physical form (files, models, etc.) in which case it is either guarded by staff or stored in a locked and secure file cabinet or safe. Digital information may be stored on encrypted file servers in secure/access-controlled locations. Digital information is password protected and stored on systems which save audit trails in the event unauthorized access must be investigated. Our systems are protected by industry standard IT security hardware and software measures.

We may enter into agreements with third-party providers specializing in data storage and protection. Sometimes that data is securely stored in the cloud, which may include locations outside of Canada. In those instances, only persons contractually obligated to secure and protect your data will be able to access that data. We will only enter into contractual agreements with providers which meet Canadian legal standards and requirements for storage and protection of personal health information.

We may also share aggregate and non-identifiable data with research institutions or third-party providers to advance oral health care. This is explicitly permitted by legislation as it poses minimal to no risk to patients but has the potential to greatly enhance health care effectiveness. We will only share such data with persons or providers who enter into the necessary agreements to keep information confidential and to safeguard and protect such data.

## **We work with experts to further protect your information**

To meet the complex and every-changing requirements of dental practice and practice administration, we partner with experts to improve the health care services we deliver and to administer our dental offices more effectively.

In addition to the independent duty of each health care provider to respect and safeguard your privacy rights, our dentists and health care providers partner with Mel McManus (Manitoba) Dental Corporation which, among other things, is our designated corporate custodian for patient



health information. Dentalcorp Health Services, ULC (“DHS”) acts as our designated Information Manager in addition to providing technical services to our office.

As Information Manager, DHS utilizes best industry standards and technology along with a robust cybersecurity program to protect patient privacy and to ensure compliance with all local and federal laws.

### **Google Analytics**

We use Google Analytics’ 3rd-party audience data such as age, gender, and interests to better understanding the behaviour of our customers and work with companies that collect information about your online activities to provide advertising targeted to suit your interests and preferences. For example, you may see certain ads on this website or other websites because we contract with Google and other similar companies to target our ads based on information we or they have collected, including information that was collected through automated means (such as cookies and web beacons). These companies also use automated technologies to collect information when you click on our ads, which helps track and manage the effectiveness of our marketing efforts.

You may opt out of the automated collection of information by third-party ad networks for the purpose of delivering advertisements tailored to your interests, by visiting the consumer opt-out page for the Self-Regulatory Principles for Online Behavioural Advertising at <http://www.aboutads.info/choices/> and edit or opt-out your Google Display Network ads’ preferences at <http://www.google.com/ads/preferences/>.

### **Remarketing**

We use Remarketing to advertise our practice across the Internet.

Remarketing will display ads to you based on what parts of our website you have viewed by placing a cookie on your web browser.

This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is used to indicate to other websites that “This person visited a particular page, so show them ads relating to that page.”

Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

If you do not wish to see ads from us, you can opt out in several ways:

1. Opt out of Google’s use of cookies by visiting Google’s Ads Settings
2. Opt out of a third-party vendor’s use of cookies by visiting the Network Advertising Initiative opt-out page
3. Opt out information for Facebook ads visit:

<https://www.facebook.com/help/568137493302217>