

Stroh Health Care Privacy Policy

Since the provision of both our provincial programs involves the collection, use, and disclosure of personal information about our clients, protecting their personal information is one of our highest priorities.

We inform our clients of why and how we collect, use, and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

We abide by our Personal Information Protection Policy, which is in compliance with British Columbia's *Personal Information Protection Act* (PIPA). Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' personal information.

We only collect client information that is necessary to fulfill the following purposes:

- To verify identity
- To understand the needs of our clients
- To deliver requested products and services
- To enrol the client in a program
- To meet regulatory requirements
- To assess suitability for programs offered by Stroh Health Care

We only use or disclose client personal information where necessary to fulfill the purposes identified at the time of collection *or for a purpose reasonably related to those purposes*.

We do not use or disclose client personal information for any additional purpose unless we obtain consent to do so.

We retain client personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

We are committed to ensuring the security of client personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal, or similar risks. The following security measures are followed to ensure that client personal information is appropriately protected:

- *Physically securing offices where personal information is held;*
- *Requiring the use of user IDs, passwords, encryption, and firewalls for electronic data*
- *Restricting employee access to personal information as appropriate (i.e. only those that need to know have access*
- *Contractually requiring any service providers to provide comparable security measures.*

We use appropriate security measures when destroying client's personal information such as *shredding documents and deleting electronically stored information*.

Our client data belongs to the Province of British Columbia and release of that information must be obtained by application under the Freedom of Information Act

Our Privacy Officer is responsible for ensuring Stroh Health Care's compliance with our Personal Information Protection Policy and the *Personal Information Protection Act*. Clients should direct any complaints, concerns, or questions regarding Stroh Health Care's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client may also write to the Information and Privacy Commissioner of British Columbia. To contact Stroh Health Care's Privacy Officer or designated individual, email info@strohhealth.com. Please include "Privacy Officer" in the subject line of the email.