

Privacy Policy

Our Commitment to Privacy

We take great pride in our education and certifications. Although they were challenging to earn, greater pride comes from our ability to connect with each of our patients on an individual level. It lets us understand the direction treatment needs to go in order to achieve the best results, given the unique situations of each person.

TLC Pharmacy takes your privacy seriously. We are committed to safeguarding the privacy and confidentiality of the personal information we collect about you. Please read the following document carefully to understand how your information is collected, used, and/or disclosed.

Each time your personal information is collected, used, or disclosed by TLC Pharmacy, it is done so for a specific purpose. TLC Pharmacy has established policies and/or practices which ensure your information is kept private and confidential.

Your confidentiality is important to us. As a condition of employment, all TLC Pharmacy staff must sign a document requiring them to follow the privacy and confidentiality codes specified therein. TLC Pharmacy also takes additional steps to educate its staff regarding privacy rules and practices associated with handling personal information. Any personal information you provide to TLC Pharmacy is collected, used, or disclosed in accordance with The Freedom of Information and Protection of Privacy Act and/or The Health Information Protection Act.

Personal Information

“Personal Information” as used in this policy means information about an identifiable individual, such as the name and date of birth of that individual, and includes non-personal information that is linked to personal information. The term “Personal Information” does not include or apply to information that does not identify you.

Consent

Unless permitted or required by law, TLC Pharmacy will not collect, use, or disclose Personal Information without first obtaining consent. Consent can be “express” through words or specific acts, or “implied” by the conduct of the individual whose Personal Information is being collected, used, or shared. Unless we determine that we require an additional consent for specific products, services, programs, contests, promotions or events, you agree and consent that as a provider of Personal Information, we may collect, use, share or otherwise process your Personal Information in accordance with this policy. See below for further rights regarding your consent or decision to withdraw it.

Collection of your Personal Information

TLC Pharmacy may collect personal information in a variety of ways such as during the course of your purchase of, or application or request for a quote for, our products and services or your participation in one or more of our programs, promotions, or events. TLC Pharmacy will collect information almost solely directly from you in person, by mail, over the telephone, or in any other direct manner.

Use and Disclosure of Personal Information

TLC Pharmacy typically uses Personal Information for the following:

Healthcare

This includes

- dispensing your medication, and providing counselling with respect to the prescription
- delivering pharmacy professional services and providing knowledge, information and counseling pertaining to these services
- communication with you regarding such pharmacy services
- assisting physicians and other health care professionals that require information on a need-to-know basis for the sole purpose of your continuing health care
- responding to requests made by, or on behalf of, your insurance provider to review your insurance claim
- managing your patient record, which includes medications dispensed and services provided
- obtaining and processing payments for prescription medications and pharmacy services
- performing obligations in accordance with, or complying with, applicable healthcare related professional, legal or regulatory requirements

TLC Pharmacy may share or disclose information when we provide you with healthcare services. We may share your personal information with your healthcare providers (which may also be referred to as your “circle of care”) and your authorized family members. If the need arises, and you specifically consent to the disclosure, we may share information with designated individuals (e.g. parents, caregivers) who have the authority to do so. Furthermore, as permitted or required by law, your personal information may be shared with your provincial drug benefit program, private health insurance, or other health claim adjudicators as necessary in order to process your claim.

Retention of Personal Information

TLC Pharmacy strives to maintain appropriate physical, procedural and technical safeguards with respect to storing of personal information to prevent loss, misuse, unauthorized access, disclosure or modification of personal information. These safeguards also apply to the disposal or destruction of Personal Information. We retain information only as long as it is required for our relationship and a certain period of time afterwards to respond to queries or as required by federal and provincial laws. When this period ends, personal information is scheduled for destruction according to our record retention policies. This schedule may vary depending on the nature of the information collected and the purpose thereof.

Your Right to Access or Amend Personal Information

The Health Information Protection Act (HIPA) provides you with certain rights regarding the information TLC Pharmacy holds about you. You have a right to request access to any of your personal information held by TLC Pharmacy and you have the right to inform TLC Pharmacy of any errors or omissions. In limited situations, we may have to deny some or all of your request to see, or receive copies of your records. In such a case we will tell you in writing why we are denying access to some or all of your records and explain your right to appeal this decision. Depending on the nature of your request, a fee may be charged. TLC Pharmacy will contact you in advance to notify you of any charges in advance of satisfying your request.

If you believe there is a mistake in the information we hold about you or that important information is missing, you may request that we correct or add to your record. If we approve your request, we will make the correction or addition to our records. If we deny your request, we will tell you why and explain how you may appeal this decision.

Health Information Protection Act (HIPA)

HIPA legislates privacy protection and obligations of trustees in the health system. The privacy and protection of your personal health information has always been a priority in Saskatchewan. When you receive health services in the province, you rightfully expect that health providers (among others) provide the highest level of protection regarding the use, disclosure, and safekeeping of your personal health information.

Legislation called The Health Information Protection Act identifies specific rights that individuals have with respect to their personal health information. These rights are important because they ensure that you will be involved in decisions about your personal health information. HIPA also places duties or responsibilities on organizations and individuals in the health system to protect the privacy of any personal health information they have about you. In doing so, they must also make sure that your rights are respected.

HIPA applies to individuals and organizations who are part of Saskatchewan's health system and who have custody or control of personal health information. The Act calls them trustees to reflect the fact that they hold your personal health information "in trust" and must manage it with your best interests in mind. TLC Pharmacy is one such trustee.

The Act also applies to personal health information in the custody or control of a trustee. Personal health information is information about your physical or mental health as well as information gathered in the course of providing you with a health service. It also includes information collected to register you for a service (name, address, date of birth). Your health services number on your health card is also considered to be personal health information under HIPA. Records of prescriptions filled by TLC Pharmacy are an example of personal health information.

Rights of Individuals

HIPA describes a number of rights that you have with respect to your personal health information. These rights include:

- The right to consent to use and disclosure. It should be noted that there are circumstances identified in HIPA where consent of the individual is not required for use or disclosure of an individual's personal health information.
- The right to revoke consent to the use or disclosure
- The right to prevent access to a comprehensive health record.
- The right to be informed by trustees about anticipated uses and disclosures.
- The right to be informed about disclosures without consent.
- The right to access personal health information about oneself.
- The right to request amendments to records of personal health information about oneself.
- The right to request a review by the Information and Privacy Commissioner about a decision by a trustee.
- The right to appeal to a court the decisions of a trustee.
- The right to designate another person to make decisions about one's personal health information.

Duty of TLC Pharmacy as a trustee

The Health Information Protection Act requires a trustee (such as TLC Pharmacy) to protect the privacy of personal health information in their custody and to respect the rights of individuals identified in the

Act. TLC Pharmacy will follow all the rules regarding collection, use, disclosure, storage, retention, and destruction of records containing personal health information.

As such, TLC Pharmacy commits to the following:

- The primary purpose for collecting personal health information must be for the benefit of the individual
- TLC Pharmacy will only collect, use or disclose personal health information that they need to know to provide you with a service
- TLC Pharmacy will also have practices in place that will protect the safekeeping of personal health information

If you still have questions about how your personal information is collected, used, or disclosed by TLC Pharmacy, you may contact TLC Pharmacy's privacy officer at:

TLC Pharmacy
Privacy Officer
149-1235 Main St. N.
Moose Jaw, SK
S6H 6M4

Telephone: (306) 972-7200
Fax: (306) 972-7201