

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 Cityplace Dental Group, all clinical dentistry services are performed by dental professionals in good standing with Manitoba Dental Association. We partner with Cityplace 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.

Cityplace Dental Group and Cityplace 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 Cityplace Dental Group may have a financial interest in Cityplace 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:

Consent to Use and Store Personal Health Information

At Cityplace Dental Group 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 manager/data custodian. You can reach Julian Perez at 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 by calling us directly at 204-943-4611. 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.