

PRIVACY POLICY – LUCENT FAMILY EYE CARE

Pursuant to the Personal Information protection and Electronic Documents Act (PIPEDA).

Dr. Linda F. Yee, Optometric Corporation operating as Lucent Family Eye Care Optometrists
Protecting the privacy of your personal information is important to us.

We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the optometric services that we provide.

We are committed to being open and transparent about how we handle your personal information. This document describes our privacy policies.

Effective Date and Changes

We will comply with the terms of this privacy policy while it is in effect.

We reserve the right to modify the policy at any time as may be required to comply with privacy legislation and the revised privacy policy will then apply to all personal information. This policy will be in effect from January 1, 2012 until the date an amended policy is published. Any changes or amendments to our privacy policy will be posted in our office and have copies available.

What is Personal Information?

Personal information is information about an identifiable individual. Personal information includes information that relates to any personal characteristics (e.g. gender, age, income, home address or phone number, ethnic background, family status), health (e.g. health history, health conditions, health services received by them) or activities and views (e.g. religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual).

Personal information does not include your business address and telephone number, which is not protected by privacy legislation.

Who We Are

Dr. Linda F. Yee, Optometric Corporation operating as Lucent Family Eye Care Optometrists includes any [optometrist](#) or health care professional, all employees, staff and student trainees authorized to collect, use or disclose personal information.

We use a number of consultants and agencies that may, in the course of their work for us may, where necessary, have limited access to personal information we hold. These include, but are not limited to; ophthalmologists to whom we refer, third party insurers, [contact lens](#) companies, lens manufacturing companies, opticians, computer consultants, office security and maintenance, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, collection agencies, website managers and lawyers.

We restrict their access to any personal information we hold as much as is reasonably possible. We also have their assurance that they follow appropriate privacy principles.

Collecting Personal Information: Primary Purposes About Patients

Dr. Linda F. Yee, Optometric Corporation operating as Lucent Family Eye Care Optometrists collects, uses and discloses personal information in order to serve our patients. For patients, the primary purpose for collecting personal information is to provide optometric services. For example, we collect information about your health history, including family history, physical condition and function and social situation as necessary to help us assess your eye care needs and to advise you of options and then to provide the eye care you choose to have.

We may communicate this information to other regulated health practitioners, technicians or individuals authorized to work in our practice as part of your continuing care. A second primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that are occurring over time. It would be rare for us to collect information without the patient's written, oral or implied consent, but this could occur in an emergency (e.g. the patient cannot communicate) or where we believe you would consent if asked and it is impractical to obtain consent (e.g. a family member passing a message on from our patient where we have no reason to believe that the message is not genuine).

Our Website

On our website we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose for which it was provided (e.g. to respond to your email message, to order eye [glasses](#) or contact lenses, to schedule an eye examination appointment). "Cookies" are only used to help you navigate our website and are not used for personal monitoring purposes.

About Contract Staff, Volunteers and Students

For people who are contracted to do work for us (e.g. temporary workers), our primary purpose for collecting your personal information is to ensure we can contact you in the future (e.g. for new assignments) and for necessary work-related communication (e.g. sending our paycheques, year-end tax receipts).

Examples of the type of personal information we collect for those purposes include home addresses and telephone numbers. It is rare for us to collect such information without prior consent, but it might happen in the case of a health emergency (e.g. a SARS outbreak) or to investigate a possible breach of law (e.g. if a theft were to occur in the office). If you as a contract staff person, volunteer or student, wish a letter of reference or an evaluation, we will collect information and your work-related performance and provide a report as authorized by you.

Collecting Personal Information: Related and Secondary Purposes

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes.

The most common examples of our related and secondary purposes are as follows:

To invoice patients for optometric services, products or treatments that were not paid for at the time the service was provided, to process credit card payments or to collect unpaid accounts either ourselves or through a collection agency or lawyer.

When the cost of some optometric services, products or treatments provided by the practice to patients is paid for by third parties (e.g. Department of Health, private insurance and various social assistance programs). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate patient entitlement to this funding.

To advise you, by telephone, mail or email that your vision and eye care needs or treatment should be reviewed (e.g. to schedule an appointment, to ensure that your eye glasses and/or contact lenses are still functioning properly and appropriate for your current needs and to consider modifications or replacement).

To advise patients, prospective patients and others of special events or opportunities (e.g. a seminar, development of a new service, arrival of a new product) that we have available.

Our office reviews patient and other files for the purpose of administration, business planning and ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g. auditors, lawyers, practice consultants, quality assurance programs) may, on our behalf, do audits and continuing quality improvement reviews of our practice, including reviewing patient files and interviewing our staff. In rare cases, our practice or our consultants may make inquiries to verify that the information we have about you is accurate.

Optometrists are regulated by the British Columbia College of Optometrists, which may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, as professionals, we report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. Also, our practice believes that it should report information suggesting serious illegal behaviour to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our patients, or other individuals, to support the concern (e.g. improper services). Also, like all organizations, various government agencies (e.g. Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commission, et cetera) have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g. lawyers, accountants) who will investigate the matter and report back to us.

Patients or other individuals we deal with may have questions about our products or services after they have been received. We also provide ongoing optometric services for many of our patients over a period of months or years for which our previous records are helpful. We retain our patient information for a minimum of seven (7) years after the last contact to enable us to respond to those questions and provide these services.

If Dr. Linda F. Yee, Optometric Corporation operating as Lucent Family Eye Care Optometrists or its assets were to be sold, the prospective purchaser would want to conduct a "due diligence" review of the practice records to ensure that it is a viable business that has been honestly portrayed to the prospective purchaser. This due diligence may involve some review that may include releasing personal information. The prospective purchaser would not be allowed to remove or record personal information and, before being provided a review of the clinical files and records, the prospective purchaser must provide a written promise to keep all personal information confidential. Only a reputable purchaser who has already agreed to purchase the practice or its assets would be provided, at closing, complete access to personal information. The purchaser would be required to maintain the same principles of privacy as established under the present privacy legislation. You can choose not to be part of some of these related or secondary purposes (e.g. by declining to receive notice of special events or opportunities, or by paying for your services in advance). We do not, however, have much choice about some of these related or secondary purposes (e.g. external regulation).

Protecting Personal Information

We understand the importance of protecting personal information.

For that reason we have taken the following steps:

Employees, including temporary staff, are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.

Paper information is either under supervision or secured in a locked or restricted area.

Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones use digital signals, which are more difficult to intercept.

Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies or collected by the patient who asks for the information.

Electronic information is transmitted either through a direct line or is anonymized or encrypted.

Verbal personal information is collected and used in such a manner that other persons would not hear the exchange of the information.

External consultants and agencies with access to personal information must enter into privacy agreements with us.

Retention and Destruction of Personal information

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services we provided to you and for our own accountability to external regulatory bodies. In compliance with the requirements of other legislation, we keep our patient files and records for a minimum of seven (7) years. We keep any personal information relating to our general correspondence (i.e. with people who are not patients), newsletters, seminars and marketing activities for about 24 months after the newsletter ceases publication or a seminar or marketing activity are over.

You can ask us, in writing, to restrict our uses and disclosures of personal information at any time. We will also discontinue to use or to disclose your personal information after a written revocation of your implied or informed consent is received, unless we have already acted in reliance upon this consent. We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that information on the hard drive is destroyed. Alternatively, we may send some or the entire patient file to our patient.

You Can Look At Your Information

With rare exceptions, you have the right to see what personal information we hold about you. All you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g. short forms, technical language, etc).

We will need to confirm your identity, if we do not know you, before providing you with this access.

We reserve the right to charge a nominal fee for such requests. We may ask you to put your request in writing. If we cannot give you access, we will notify you within thirty (30) days if at all possible and provide the reason, as best we can, as to why we cannot give you access. If you believe there is a mistake in the information we have about you, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation that our files are incorrect. Where a mistake has been made, we will make the correction and notify anyone to whom we sent this information. If we do not agree that a mistake has been made, we will include in our file a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.