



# Privacy, Confidentiality & Data Protection Policy

***CPYC is committed to safeguarding the privacy and security of personal information collected from employees, clients, stakeholders, and other individuals who engage with our business. We adhere to all relevant Canadian data protection laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Health Information Protection Act (PHIPA) in Ontario, and any applicable provincial legislation.***

This policy outlines how we collect, store, process and protect personal and health-related data, ensuring transparency and respect for individual rights while maintaining compliance with legal and ethical obligations.

## ***Who we are***

Our website address is: <https://cpyc.ca>.

## ***Scope***

This policy applies to all individuals and entities that interact with CPYC, including but not limited to:

- Employees (including contractors of CPYC)
- Independent contractors and consultants
- Job candidates
- Clients and customers
- Suppliers, vendors, and business partners
- Any external parties who require occasional access to personal or health-related data in the course of business operations.

All individuals subject to this policy must adhere to its principles and ensure the responsible handling of data.

## ***What personal data we collect and why we collect it***

As part of our business operations, we may collect and process personal and health information including but not limited to the following.

- Names, addresses, phone numbers, and email addresses
- Employment details and job applications
- Financial and payment information
- Usernames, passwords, and digital footprints
- Photographs and identification documents (where applicable)
- Health related data, including medical history, treatment plans, and other personal health information (PHI) as required for service delivery.

Clients of CPYC have an online account created in our bookings system called “MY ACCOUNT” that is hosted by a service called “Jane” (<https://jane.app/>). Clients can manage their account through CPYC online booking service, including booking, rescheduling and canceling appointments, making payments and keeping their personal details up to date. Personal data we hold includes:

- Names and Addresses
- Telephone numbers
- Email address
- Emergency contact
- Family doctor
- Date of birth
- Gender and sex
- Employer
- Occupation
- Active credit card details
- For parents - custody status
- Relevant relationships to clients (e.g. parents to children, spouse etc)
- Intake forms, consent forms, questionnaires, surveys
- Clinical notes

## ***Client Intake Forms***

All CPYC new clients must complete intake forms as part of the online booking process for psychotherapy, yoga therapy and yoga classes. The intake form is an important document as it is designed to provide the client with informed consent around CPYC policies with completion and signing of the form signaling that clients agree to abide by the policies. These include:

- Accuracy of information provided
- Privacy and sharing of personal information
- Cancellation policy
- Informed consent and service agreement
- Confidentiality
- Consent to treatment
- Fees policy consent

- Parental/Guardian Consent for children under the age of 13 years old
- Signature
- Yoga class and yoga therapy disclaimer/waiver/release

Please see our **Booking Policy** for further details on the cancellation policy.

### **International Clients**

Clients who are seeking therapy and are non-residents of Canada must complete the “Contract for International Clients” form.

### ***Linking Client Accounts***

There are times when client My Accounts are “linked” via “relationships”. This is usually because clients are in therapy together (e.g. couples therapy, family therapy, children in therapy). When we link client accounts we are doing this through “relationships” the client has with one another. We then set up various permissions that clients can receive for each other’s “My Account”. Clients must provide consent to have these permissions set on their account, and these can be changed at any time, these include:

- View and pay
- Manage bookings and intake forms
- Receive copies of receipts, statements and financial emails
- See appointments in calendar subscriptions

### ***Client Confidentiality***

As part of the Psychotherapy and Yoga Therapy processes, the Psychotherapists and Yoga Therapists at CPYC are bound by ethical responsibilities, college requirements (CRPO, OCSWSSW and IAYT) and PHIPPA to keep confidential the information shared during the sessions. In general, we will not release any information without clients' written permission.

There are important exceptions to the confidentiality of the Psychotherapy and Yoga Therapy relationship.

- All Psychotherapists and Yoga Therapists are required by law to reveal certain information under the following circumstances:
- Client’s disclosure of serious intent to do harm to self or others.
- Client’s disclosure of child abuse or our serious suspicion of child abuse, elder abuse, or dependent adult abuse.
- If a court of law orders the release of specific information.

The Psychotherapists and Yoga Therapists at CPYC must obtain an individual’s authorization to use or disclose psychotherapy notes with the following exceptions:

- The Psychotherapist who originated the notes may use them for treatment. This includes consulting with other health and mental health professionals about a case.
- During consultations, Psychotherapists and Yoga Therapists make every effort to avoid revealing the identity of clients. The other professionals are also legally bound to keep the information confidential.
- The Psychotherapists and Yoga Therapists at CPYC may use for educational

purposes, without an individual's authorization, the psychotherapy notes, in training situations where names and identifying information are changed for the protection of the client.

- Psychotherapists and Yoga Therapists at CPYC regularly consult with each other in a group format to maintain the high standard of care we set for all of our therapists. At these "in house" case consultations, we will collaborate on your case within the therapy team and confidentiality will remain within the therapy team.
- Additionally, the Psychotherapists and Yoga Therapists at CPYC may use and disclose the psychotherapy notes to defend themselves in legal proceedings or other complaints brought by the client.
- The Office Manager may see confidential information in client files at times. They are bound by a confidentiality agreement, and we will take any unnecessary breaches of confidentiality seriously.
- Our accountants will be able to see the client's name, address and billing information. They will not have access to client's case notes. They are also bound by confidentiality agreements, and we will take any unnecessary breaches of confidentiality seriously.

### ***Website & Public Disclosures***

Our website privacy policy can be found on our website page under [Privacy Policy](#).

Our associated websites (e.g. Jane app) may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website. See Jane's [privacy policy](#).

We utilize Google Workspace and Gmail. To see how Google protects your privacy and security please see the information provided on their [website](#).

### ***Social Media and Online Interactions Policy***

Our commitment to your privacy and the therapeutic relationship extends to our online presence. To maintain professional boundaries, protect your confidentiality, and ensure the integrity of your therapy, we adhere to the following guidelines regarding social media and online interactions:

1. **No "Friending" or Connecting on Personal Social Media:** To preserve the therapeutic relationship and your privacy, we do not accept "friend" or "follow" requests from current or former clients on any personal social networking sites (e.g., Facebook, Instagram, LinkedIn, X/Twitter, etc.). We believe that engaging in personal social media interactions blurs the boundaries of the therapeutic relationship and could compromise your confidentiality.
2. **Professional Pages and Information:** We may maintain professional social media pages (e.g., a practice Facebook page, a professional LinkedIn profile) for informational purposes, such as announcing workshops, providing general

mental health resources, or sharing practice updates. While you are welcome to view and follow these pages, we ask that you refrain from engaging in direct or public communication about your personal therapy or private matters on these platforms. Comments or messages containing personal information or therapy-related content will not be responded to and may be removed to protect your privacy.

3. **No Endorsements or Testimonials:** Due to ethical guidelines and to protect your confidentiality, we cannot solicit or accept client testimonials or endorsements on social media or any public online platforms. We can publish general anonymous feedback on our programs.
4. **Privacy of Online Content:** We do not search for clients on social media or other online platforms. Your online presence is your private space. The only exception would be in situations where we have a reasonable belief that you are in danger and we are unable to reach you through traditional means.
5. **Confidentiality in Online Communications:** Please be aware that direct messages, emails, or other online communications may not be entirely secure. For this reason, we prefer to discuss sensitive or clinical matters during your scheduled therapy sessions or via secure methods we explicitly communicate.
6. **Responding to Online Reviews:** Our professional ethics prevent us from responding to any online reviews, positive or negative, in a way that could reveal your identity as a client or discuss any aspect of our therapeutic work. If you have concerns about your therapy, please discuss them directly with your therapist during a session.

By engaging in therapy with us, you acknowledge and agree to this social media and online interactions policy.

### ***How long we retain your data***

Retention of records. Client files are kept in accordance with CMPA (Canadian Medical Protective Association

<https://www.cmpa-acpm.ca/en/advice-publications/browse-articles/2003/a-matter-of-records-retention-and-transfer-of-clinical-records> ) and are retained as follows, adults (18 and older) 10 years past the date of the last entry in the client record, children (18 and under), 10 years from the date of record until they reach adult age (18).

## ***What rights you have over your data and company obligations***

Individuals whose data we have collected have specific rights under Canadian privacy laws, including:

- The right to know what personal and health data we collect and why.
- The right to access their personal and health information upon request.
- The right to request corrections, deletions, or limitations on data processing.
- The right to withdraw consent at any time (where applicable).
- The right to be informed in the event of a data breach affecting their personal or health information.

## ***How we protect your data***

CPYC adheres to PHIPA (Personal Health Information Protection Act), PIPEDA (Personal Information Protection and Electronic Documents Act), OCSWSSW (Ontario College of Social Workers and Social Service Workers), CRPO (College Registered Psychotherapists of Ontario), IAYT (International Association of Yoga Therapists) requirements through:

- Accuracy: Accurate and kept up to date records to ensure reliability.
- Transparency: Clearly outlining data collection and usage procedures.
- Access control” Restricting and monitoring access to sensitive data. Client files are created, managed and maintained through the secure online booking system (Jane). Jane is compliant with PHIPA regarding security of electronic data (<https://jane.app/guide/basics/security-faq>).
- Secure disposal: CPYC shreds all notes, messages, jottings at their offices and these are destroyed via recycle waste.
- Employee Training: Providing ongoing education on privacy laws, cybersecurity and PHIPA compliance.
- Cybersecurity Measures: Implementing secure networks, firewalls, encryption, and regular data backups.
- Contractual Safeguards: Including privacy clauses in agreements with third parties.
- Incident Reporting: Clear processes for reporting and managing data breaches.

## ***Incident Reporting***

If CPYC or an individual suspects or confirms a privacy breach, either party can raise the concern.

- Individuals contact the Office Manager on 705 300 2329 extension 0.
- CPYC will inform individuals of any incidents where there is a suspected or confirmed breach and provide what information they suspect/or confirmed to have been shared.
- CPYC or the individual can contact the Privacy Commission of Ontario if further advice or guidance is required ([info@ipc.on.ca](mailto:info@ipc.on.ca)).
- CPYC can contact Professional Practice advisors for their respective professional organisations.

## ***Enforcement & Compliance***

Compliance with this policy is mandatory. Any employee, contractor, or external party who fails to adhere to these data protection guidelines may face:

- Internal disciplinary action, including suspension or termination of employment or contract.
- Legal actions, if the breach constitutes a violation of privacy laws.
- Potential liability for damages resulting from non-compliance.

## ***Policy Review & Updates***

This policy will be reviewed periodically to ensure compliance with evolving Canadian privacy laws, PHIPA and best practices. Any updates will be communicated to relevant parties.

Effective Date: 19th June 2025.

Last Reviewed: May 2025

Version: V3

Privacy Officer Contact: Office Manager, [info@cpyc.ca](mailto:info@cpyc.ca), 705 300 2329 Ext.0