

 ORGANIZATIONAL SOLUTIONS INC. SOLUTIONS ORGANISATIONNELLES INC.	POLICY AND PROCEDURE	Pages 1 of 6	Number
Subject PRIVACY POLICY		Date March 19, 2012	
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POLICY

At Organizational Solutions Inc. the privacy and protection of personal information is important to us. At Organizational Solutions Inc. we are committed to protecting the privacy, confidentiality, accuracy and security of the personal information we collect, use, retain and disclose and we are also concerned about the personal information of our employees and representatives. **To ensure the protection of client files, it is forbidden to remove original files from Organizational Solutions Inc. offices.**

PURPOSE

This Privacy Policy governs the way Organizational Solutions Inc. collects holds and uses personal data that clients and their employees submit.

Organizational Solutions Inc. acknowledges client expectations that personal information disclosed to Organizational Solutions Inc. will only be used for the purpose of providing the services of case management and for furthering evidence based best practices and will not be released without informed consent.

Organizational Solutions Inc. has developed this policy to comply with Canada's Personal Information Protection and Electronic Documents Act.

PROCEDURE

Personal Information

Personal information pertains to recorded data that identifies an individual whether communicated through oral, electronic, or written form. Organizational Solutions Inc.'s personal information typically includes, but is not limited to, an individual's:

- Name, home address or home telephone number.
- Age, gender, marital status or family status.
- Identifying number, symbol or other particular assigned to the individual.
- Health and health-care history including information about physical or psychological disability.
- Educational, financial, or employment history.

How we use the information we collect

Our policy at Organizational Solutions Inc. sets high standards on collecting, using, disclosing and retaining personal information. For our clients, the primary purpose of collecting personal information about an individual is to provide Disability Management services for that person. We collect only the information we need for the purposes of managing claims. Our files are kept for the purpose of providing early and safe return to work and assessment information. We retain information for as long as necessary for the purpose for which it was collected and in accordance with legislation.

Website information

Organizational Solutions Inc. uses our “**Careers**” page that serves to communicate career opportunities. When an individual submits their resume on our website by clicking the “**Submit**” button they are submitting personally identifiable information.

For members of the general public and clients, our primary purpose for collecting personal information is to provide notice of special events, such as a seminar or conference, or to make them aware of services at Organizational Solutions Inc.

Links to Other Sites

The privacy policy only covers Organizational Solutions Inc.’s website. When you visit our website, you may discover that it contains links that may take you to sites operated by third parties that are not within Organizational Solutions Inc.’s control and are not covered by this Privacy Policy. If you use a link you are advised to check their applicable privacy practices and policy for each particular new site. We at Organizational Solutions Inc. do not accept any responsibility or liability for the practices of other websites.

Contractors

For the people who are contracted to do work for us they are required to have prior knowledge and consent to Organizational Solutions Inc.’s Privacy Policy. Our primary purpose for collecting personal information is to ensure we can contact them in the future (work assignments) for necessary work-related communications (sending pay cheques), letter of reference, or an evaluation about their work.

Common Purposes

We also collect and disclose information for common purposes such as:

- To invoice clients for goods and services or to collect unpaid accounts.
- To advise clients that their service should be reviewed (e.g. to ensure service is still relevant to personal needs).

- To advise customers and others of special events or opportunities (e.g. seminars or conferences or new service options).
- For reviewing client and other files for the purpose of ensuring our high standards and services are being met. This may include external consultants such as lawyers, accountants, private consultants on our behalf and continuing quality control reviews of our company and its standards and services.
- Occasionally, there may be the opportunity to win prizes through participation in periodic prize draws or other promotions on our website, at seminars, or elsewhere. To enter we may ask that an individual provide their name, address, and phone number. Unless they opt out by contacting us, the information provided will be collected, used and disclosed as provided in this Privacy Policy.
- We also use a third party provider to help us gather information about the areas that are visited on our website in order to evaluate and improve the customer experience and the convenience of the website. The third party provider is contractually restricted with the information provided to us in any manner.

Using e-mail or fax to communicate health information

The privacy of client e-mail and faxes containing vital medical information is paramount to Organizational Solutions Inc. As with the paper record, the client has the right to privacy and confidentiality of her/his personally identified medical information.

Organizational Solutions Inc.'s Health Professionals have a duty to retain the confidential nature of patient records at all times. Clients will be informed of privacy issues and will be given detailed instructions regarding the information they provide over the internet.

All client data containing sensitive and confidential information is assigned security protections to control access to the information.

E-mail attachment

This e-mail and any attachments may be confidential or legally privileged. If you received this message in error or are not the intended recipient, you should destroy the e-mail message and any attachments or copies, and you are prohibited from retaining, distributing, disclosing or using any information contained herein. Please inform us of the erroneous delivery by return e-mail. Thank you for your cooperation.

CONFIDENTIEL: Ce courriel est confidentiel et protégé. L'expéditeur ne renonce pas aux droits et obligations qui s'y rapportent. Toute diffusion, utilisation ou copie de ce message ou des renseignements qu'il contient par une personne autre que le (les) destinataire(s) désigné(s) est interdite. Si vous recevez ce courriel par erreur, veuillez m'en aviser immédiatement, par retour de courriel ou par un autre moyen.

Fax attachment

Confidentiality Notice:

The document accompanying this fax transmission contains confidential information belonging to the sender, which is legally privileged. The information is intended solely for the use of the individual or the entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action in reliance on or regarding the contents of this faxed information is strictly prohibited. If you have received this fax in error, we apologize and ask that you immediately notify the above by telephone to arrange for the return of the fax.

Organizational Solutions Inc.'s Health Professionals must be knowledgeable regarding the risks and benefits as well as mechanisms for protecting patient privacy, confidentiality, and systems security in our present information age.

Quality Assurance

“Confidentiality refers to the trust placed that the information shared will be respected and used only for the purpose disclosed. Confidentiality is an inherent requirement of the daily activities of any health record professional.” (Styffe, 1997)

Duty of Health Professionals

All of Organizational Solutions Inc.'s Health Professionals have a duty to retain the confidential nature of patient records at all times. Health information management includes not only collection of patient data, but also protecting it, interpreting it and analyzing it to make decisions.

Organizational Solutions Inc.'s Health Professionals will ensure that they comply with the professional standards of their governing regulatory bodies in maintaining security accountability. Every reasonable effort will be taken to ensure subcontractors also adhere to Organizational Solutions Inc.'s privacy standards.

An Organizational Solutions Inc. internal audit of privacy practices will be conducted on a periodic basis.

Security and Confidentiality

Signed member consent: All claim forms include express consent wording, giving us permission to gather medical and personal information to use for the identified purpose, and to share specific information with the authorized parties as necessary.

Retention of Medical Forms: Reasonable measures have been taken by Organizational Solutions Inc. to provide security for any personal information stored in

Organizational Solutions Inc.'s offices such as passwords, read only options and secure filing cabinets in a secure room.

Claims Audit Agreement: Auditors **must** sign a confidentiality agreement when a claims audit takes place. Should Organizational Solutions Inc. subcontract the services outlined in the policy to another firm, Organizational Solutions Inc. will require the subcontracted firm to commit in writing (signed and dated) to the complete privacy and security of any personal information to which they may have access.

Principles Applying to the Privacy Policy

Accountability

Each employee at Organizational Solutions Inc. is responsible for personal information under her/his control and each is ultimately accountable to Liz Scott, Principal, for compliance with this Privacy Policy. Liz Scott, Principal, will ensure that, as a whole, Organizational Solutions Inc. adheres to this Privacy Policy.

Identify Purposes

The purpose for which any personal information is being collected will be identified before or at the time the information is collected.

Limiting Collection

The personal information will be limited to that which is necessary for the purposes identified. Personal information will be collected under policies and procedures that are fair and lawful.

Limiting Use, Disclosure, and Retention

Personal information will not be used, disclosed, or retained for purposes other than those for which the information was collected, unless the individual gives permission for another reason, or it is permitted under law. Personal information will be retained as long as the file is active and for such periods as prescribed by applicable laws. A file will be deemed inactive when the case is closed. Information in an inactive file will be retained for seven (7) years, except in cases in which a long latency disease exists, eg. hearing loss. Long latency disease files will be retained for 40 years. Guidelines will be developed with respect to the destruction, erasure or anonymizing of personal information once it is no longer required.

Accuracy

Personal information will remain accurate, complete and current as is necessary for the identified purposes for which it is to be used.

Safeguarding Information

Organizational Solutions Inc. will protect personal information with safeguards appropriate to the sensitivity of the information provided.

Openness

Organizational Solutions Inc. will make specific policies and procedures of an individual's personal information available in a manner that the information is readily available and easy to understand.

Individual Access

Organizational Solutions Inc. will give access to an individual who wishes to review or verify personal information. Written request must be given to the Privacy Officer. Upon request to review their file identity will be verified. Once identity is verified the individual will be permitted to review personal information that has been collected, individuals can make a request in writing to Organizational Solutions Inc. and within a reasonable amount of time ask how their personal information is being used and to whom it has been disclosed.

Addressing Complaints and Suggestions

Individuals can address any complaint or suggestion regarding compliance with the above principles. Organizational Solutions Inc. has policies and procedures to receive, investigate, and respond to complaints and suggestions. You may learn more about these policies and procedures by contacting the Human Resource Lead at 905-315-7179 or 1-866-674-7656.

Changes to the Privacy Policy

Organizational Solutions Inc. reserves the right to change or modify this Privacy Policy at any time. Any changes or modifications to this Privacy Policy will be effective immediately. Organizational Solutions Inc. has a commitment to ensure compliance with applicable privacy legislation. This policy will be reviewed on an annual basis.

Contact

If you have any other questions about this Privacy Policy write to:

Valerie Prigent, Privacy Officer/HR Coordinator
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