

Access to information may be more meaningful to you if such access is provided in the presence of a service provider who can explain terminology and the organization's policies. We encourage you to invite a care provider from Suomi-Koti to assist you in your review of your personal information.

Sometimes a staff person will not provide you with information about you that is within his/her control. This can occur if your right of access is constrained pursuant to the provisions of the Personal Information Protection and Electronic Documents Act (PIPEDA). For example, the staff person will **not** provide you with personal information if:

- It would reveal personal information about another party and your personal information cannot be separated.
- The information is subject to solicitor-client or litigation privilege
- The information is used for the detection and prevention of a criminal activity and dealings in the proceeds of crime.

If a staff person refuses your request for access to personal information, you will be told why unless prohibited by law. You may challenge the decision.

If our Executive Director of the Centre or Administrator/Director of Care of the Nursing Home, Privacy Officer or delegate is unable to satisfy your inquiries, you may contact the office of the Privacy Commissioner of Ontario:

**Information and Privacy Commissioner  
of Ontario**

2 Bloor Street East, Suite 1400 Toronto, ON  
M4W 1A8

Email: [info@ipc.on.ca](mailto:info@ipc.on.ca)

Toronto Area: 416-326-3333

Toll Free: 1-800-387-0073

TDD/TTY: 416-325-7539

**Office of the Privacy Commissioner of Canada**

30, Victoria Street  
Gatineau, Quebec  
K1A 1H3

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

TTY: (819) 994-6591

Once you have the information, all you have to do is check for its accuracy and let us know if there are any corrections required. We will correct our records or make a note of differences. If information has been provided to third parties, we will convey the corrected information or not any differences to them, if necessary.

Ultimately senior management is responsible for protecting our residents/tenants' information. They delegate day-to-day responsibilities to others, such as privacy officers, within the organization. Every staff person must take responsibility for protecting resident/tenant privacy, confidentiality and security. There are controls over the use of computers, paper documents, faxing activities, access to personal information.

If you or your family have concerns or questions about the management of personal information in our organization or about our compliance with privacy codes and laws, we invite you to direct your questions and concerns to Executive Director, Juha Mynttinen at 416-425-4134 extension 243 or the Administrator/Director of Care, Ligia Baraian at 416-421-6719 extension 228.

**We trust that we will be able to resolve any issues that you have regarding the protection of personal information.**



# TORONTO FINNISH-CANADIAN SENIORS CENTRE



# PROTECTION OF PRIVACY

## Protection of Privacy

Suomi-Koti Toronto, the Finnish-Canadian Seniors Centre and Nursing Home exist to provide you with a broad variety of care and services. To meet your needs and to serve you well, Suomi-Koti Toronto needs to know some of your personal information.

You, as an individual, have a right to know how we collect, use and disclose personal information. You have a right to expect that, to the best of our ability, your personal information held by us remains accurate, \*confidential and secure.

*\*Please note that there are some areas where we have determined that strictest confidentiality might prohibit things that we consider to enhance the quality of life of our residents. In light of this, please be advised that unless we hear otherwise from the resident or tenant's representative, we will not choose the strictest approach. We will welcome new residents/tenants in the newsletter, announce and celebrate birthdays, post photographs of resident/tenant events and publicly recognize deaths. We will answer general inquiries (e.g. Is Mrs. Smith living at Suomi-Koti?) over the telephone, and in case of crisis care, we will try to give enough information to friends and family that they can make informed decisions about visiting and giving support to the resident/tenant. While we will endeavour to protect the privacy of our residents/tenants, our goal is also to maintain a homelike atmosphere and to promote community spirit.*

*Suomi-Koti Toronto is proud of its commitment to maintaining the confidentiality, privacy and security of personal information and we've provided this write-up to explain how we protect the privacy of individual resident/tenant information in our organization.*

Suomi-Koti's Privacy Policy is being developed based on the Canadian Standards Association Model Code for the Protection of Personal Information and the Federal Personal Information Protection and Electronic Documents Act.

It is important that a trust relationship be established between you and our organization. To this

end, we are pleased to share information with you. The more you know, the more confident you can feel about receiving our services. Similarly, the more we know about you, the better we can serve you.

### **Suomi-Koti Toronto collects and uses information about you for the following purposes:**

- To make decisions about the types of services you need
- To serve as a means to communicate with service providers
- To monitor the provision of services and evaluate your response to services provided
- As a legal document made in the normal course of business
- To serve as a record of services provided
- To appoint a Substitute Decision Maker
- As proof of what was done, by whom and when during a tenant's/resident's encounter with a provider
- To be used as evidence against or for the organization, the service providers or the tenant/resident
- To verify our accountability
- For strategic planning, decision making, allocating of resources
- To meet legal and regulatory requirements.

Because it is important that we keep your trust, we will only ask for information which we need and when we ask you for information, we'll let you know why we need it. To the best of our ability, we will seek your consent to verify and supplement information collected from external sources such as Local Health Integration Network, physicians, social services, Ministry of Long Term Care.

If you refuse or withdraw your consent to the collection, use or disclosure of information about you, we may not be able to continue to provide you with some services that you require.

With your consent and where laws allow this, we may share your personal information with other service providers such as the hospital, pharmacy, medical specialist, social worker; or provide services directly to you as required. If you do not want to be

contacted by these other service providers, we will withhold information from them.

Under normal circumstances, we will not collect, use or disclose your personal information without your consent. Disclosure means providing specific information about you from our records to a third party. The notable exceptions to this rule are when the disclosure is permitted by law or when it is impossible or impractical to get your consent.

### **Some examples of situations where we will not seek your consent for disclosure are:**

- For emergency or life threatening events
- Where personal information is given to agents and service providers for services such as laboratory and pharmacy services
- Where there is legal obligation to disclose under a court or government order, for instance to police
- Where personal information must be given to insurers in connection with insurance services

We attempt to ensure that the information we hold about you is accurate, complete and up-to-date. If there are changes to your information, (e.g. a new Substitute Decision Maker (SDM) has been named) please notify us immediately.

If you believe that information in your records may be inaccurate, we make it easy for you to access, verify and update it. If information has been provided to third parties, we will convey the corrected information to them if necessary.

If we do not agree to change your personal information, you may challenge our decision. We will make a record of this challenge and, if necessary, disclose the challenge to third parties who also process your information.

To review your personal information simply ask a staff person for assistance. The staff person will provide you with instructions about accessing your information.

There may be a charge for retrieving your information in which case you will be notified in advance and may, if you like, withdraw your request. You may also challenge the reasonableness of the charge.