



PRIVACY POLICY

Privacy of personal information is an important principle at ProActive Rehab. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

WHAT IS PERSONAL INFORMATION?

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions, expressed by an individual, an opinion or an evaluation of an individual). Personal information is to be contrasted with business information (e.g., an individual's business address and telephone number) which is not protected by privacy legislation.

WHO WE ARE

Our organization has multiple locations, and we employ a multidisciplinary team of clinicians who are registered to offer services in the following disciplines: physiotherapy, occupational therapy, kinesiology, psychotherapy, and registered massage therapy. We also use physiotherapy assistants to assist in the provision of physiotherapy and occupational therapy care. ProActive Rehab also uses a number of consultants that may in the course of their duties have limited access to personal information we hold. These include computer consultants, maintenance, bookkeepers and accountants, temporary workers to cover holidays, credit card companies, cleaners and lawyers. We restrict their access to the personal information we hold as responsibly as possible. We also have their assurance that they follow appropriate privacy principles.

WE COLLECT PERSONAL INFORMATION: PRIMARY PURPOSES

About Clients

We collect, use and disclose personal information to serve our clients. For our clients the primary purpose for collecting personal information is to provide treatment. For example, we collect information about a client's health history, including their family history, physical condition and function and social situation to help us assess what their health needs are, to advise them of their options and then provide the health care they choose to have. 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 such information without the client's expressed consent, but this might occur in an emergency (e.g., a family member passing a message on from our client and we have no reason to believe that the message is not genuine).

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 personal information is to ensure we can contact them in the future (e.g., for new assignments) and for necessary work-related communication (e.g., sending out paychecks, 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

North Bay Clinic	ProActive Rehab	Powassan Clinic	Mattawa Clinic
Cassells St., 760 ON	34 Cairns Cres.,Huntsville,ON	8 King St., ON	217 Turcotte Park Rd. PO Box 70, ON
T. 705-494-8975	T. 705-788-1480	T. 705-724-9851	T. 705-744-5511 x2244
F. 705-494-4836	F. 705-788-1486	F. 705-724-9000	F. 705-744-6021



possible breach of law (e.g., if a theft were to occur in the clinic). If contract staff volunteers or students wish a letter of reference or an evaluation, we will collect information about their work-related performance and provide a report as authorized by them.

WE COLLECT 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 clients for goods or services that were not paid for at the time, to process credit card payments or to collect unpaid accounts.
- To advise clients that their product or service should be reviewed (e.g., to ensure a product is still functioning properly and appropriate for their current needs and to consider modifications or replacement).
- To advise clients and other individuals of special events or opportunities (e.g., a seminar, development of a new service, arrival of a new product) that we have available.
- Our clinic reviews clients and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff, in addition, external consultants (e.g., auditors, lawyers, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing quality improvement reviews of our Clinic, including reviewing client files and interviewing our staff.
- The regulated health professionals at ProActive Rehab are regulated by their professional college who may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, as professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. Also, our organization believes that it should report information suggesting serious illegal behavior to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients, 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, etc.) 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.
- The cost of some goods/services provided by the organization to clients is paid for by third parties (e.g., OHIP, WSIB, private insurance or Assistive Devices Program). 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 client entitlement to this funding.
- Clients or other individuals we deal with may have questions about our goods or services after they have been received. We also provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of ten years after the last contact to enable us to respond to those questions and provide these services (regulatory Colleges also requires us to retain our client records). If ProActive Rehab or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the Clinic’s records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

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You can choose to be excluded from some of these related or secondary purposes (e.g., by declining to receive notification of special events or opportunities). 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:

- 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 are digital, as such signals are most difficult to intercept.
- Paper information is transmitted through sealed, addressed envelopes or boxes by reputable companies.
- Electronic information is transmitted either through a direct line or is anonymized or encrypted.
- Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- 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 provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our client files for about ten years. Our client and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away. We keep any personal information relating to our general correspondence (e.g., with people who are not clients) newsletters, seminars and marketing activities for about six months after the newsletter ceases publication or a seminar or marketing activity is over.

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 the hard drive is physically destroyed. Alternatively, we may send some or the entire client file to our client.

YOU CAN ACCESS YOUR INFORMATION

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try and help you to 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.

If you were treated by one of ProActive Rehab's registered health practitioners under contract through Ontario Health at Home (OHaH), and you request access, correction or disclosure of your personal health information, we will notify OHaH and respond within 30 days.

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If there is a problem, we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe there is a mistake in the information, 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 wrong, including Ontario Health at Home for patients who were seen through that organization. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we have made a mistake, we will still agree to include in our file a brief statement from you on the point and we will forward this statement to anyone else who received the earlier information.

DO YOU HAVE A QUESTION?

Our registered therapists will attempt to answer the questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to Claude Martel Reg. PT at Claude@martelmitchell.ca or to Michael Mitchell Reg. PT, at Mike@martelmitchell.ca. They will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

If you have a concern about the professionalism or competence of our services or the mental or physical capacity of any of our professional staff we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory bodies:

COLLEGE OF PHYSIOTHERAPISTS OF ONTARIO
375 University Avenue, Suite 901, Toronto, Ontario M5G 2J5
phone: 406-591-3828, 1-800-583-5885 fax: 416-591-3834
email: info@collegept.org website: www.collegept.org

COLLEGE OF REGISTERED PSYCHOTHERAPISTS ONTARIO
375 University Avenue, Suite 800, Toronto, Ontario, M5G 2J5
phone: 1-844-712-1364 fax 416-639-2168
email: info@crpo.ca website: <https://crpo.ca/>

COLLEGE OF OCCUPATIONAL THERAPISTS OF ONTARIO
20 Bay Street, Suite 900, PO Box 78, Toronto, ON M5J 2N8
phone: 1-800-890-6570 fax 416-214-1173
email: info@coto.org website: www.coto.org

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F. 705-744-6021



COLLEGE OF KINESIOLOGISTS OF ONTARIO
160 Bloor Street East, Suite 1402, Toronto, ON M4W 1B9
phone: 1-416-961-7000 fax: 416-961-7009
email: info@coko.ca website: www.coko.ca

COLLEGE OF MASSAGE THERAPISTS OF ONTARIO
1867 Yonge Street, Suite 810
Toronto, Ontario, M4S 1Y5, Canada,
phone: 1-800-465-1933 fax: 416-489-2625
Email: cmtocmto.com

his policy is made under the *Personal Information Protection and Electronic Documents Act*. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here. There are some exceptions to the commitments set out above.

For more general inquiries, the Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Privacy Commissioner can be reached at:

112 KENT STREET | OTTAWA ONTARIO | K1A 1H3
PHONE (613) 995-8210 | **TOLL FREE** 1-800-282-1376 | **FAX** (613) 947-6850 | **TTY** (613) 992-9190
www.privcom.gc.ca

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