

Effective Date: November 23, 2011  
Review Date: November 23, 2013

## 1. PURPOSE

The Ontario Medical Association (OMA) is committed to advancing the interests of its membership. The protection of individual privacy is a paramount consideration in the OMA's collection, use and disclosure of any personal information that has been provided to us.

## 2. SCOPE

Our obligations apply to all officers, employees, contractors and agents who provide services to or on behalf of the OMA in connection with our delivery of products, services and information to our membership.

## 3. DEFINITIONS

*Personal Information:* The OMA considers "Personal Information" to mean any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information, other than business contact information (e.g. name, title, business address, e-mail address, telephone and fax numbers).

## 4. POLICY INFORMATION

### Why Does the OMA Collect Personal Information?

The OMA collects information about members to fulfil its objectives and mandate, which include:

- Communicating with our members;
- Assessing the needs of our members;
- Providing products, services and information to our members;
- Conducting surveys and polls of members;
- Permitting affiliated and other reputable third-party organizations, subsidiaries, and Preferred Suppliers to provide products, services and information to our members;
- Managing our relationship with members;
- Meeting any legal or regulatory requirement; and
- Other purposes consistent with the above.

### How Does the OMA Use Personal Information?

The OMA only collects, uses and discloses Personal Information for purposes that would be considered reasonable in the circumstances and only such information as is required for the purposes of providing products, services or information to our members. Our use of Personal Information is limited to the purposes described in this Policy

## **When May the OMA Disclose a Member's Personal Information?**

All Personal Information is held in confidence and, except in limited circumstances, is not revealed to anyone unless expressly or implicitly authorized by the person themselves.

The OMA does release the name, address, telephone number and e-mail address of members ("OMA membership information") to affiliated organizations, preferred suppliers and other reputable organizations when:

- In the opinion of the OMA, such usage constitutes a service and information relevant to members; and
- The OMA has the written agreement of such organizations to adhere to specific requirements with respect to their use of that information.

Please note that there are circumstances where the use and/or disclosure of Personal Information is permitted where the OMA is required to disclose information *without* consent. Such circumstances may include:

- Where required by law or by order of a court, administrative agency or other governmental tribunal;
- Where the OMA believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to establish or collect fees;
- Where it is necessary to permit the OMA to pursue available remedies or limit any damages that the OMA may sustain; or
- Where the information is public.

In such situations, the OMA will not disclose more information than is required.

## **How Does the OMA Obtain Consent to Collect, Use and Disclose a Member's Personal Information?**

Unless permitted by law, no Personal Information is collected without first obtaining the consent of the individual concerned. However, we may seek consent to use and disclose Personal Information after it has been collected in those cases where the OMA wishes to use the information for a purpose not identified in this Policy or not previously identified.

If a Member consents, his or her personal information shall be used for the purposes indicated in this policy statement. If a member does not consent, then his or her Personal Information shall be used by the OMA for purposes of communicating with the Member only and shall not be provided to anyone else (e.g. Preferred Suppliers). In the event a Member does not indicate his/her consent, the submission of the information constitutes consent to the use of his or her personal information for these purposes.

Consent may be withdrawn at any time. To withdraw consent, a member is requested to contact the OMA at the address or e-mail noted below.

## **The Accuracy and Retention of Personal Information**

The OMA endeavours to ensure that any Personal Information provided by its members and in its possession is as accurate, current and complete as necessary for the purposes for which the OMA uses such information. Should the OMA become aware that Personal Information is inaccurate, the OMA will revise the Personal Information and, if necessary, use its best efforts to inform third parties provided with inaccurate information so that those third parties may also correct their records. Information about former members is not regularly updated unless the former member initiates contact regarding updated information.

Personal Information is kept only as long as it is required for the reasons it was collected. When a Member's Personal Information is no longer required, the OMA has procedures to destroy, delete, erase or convert it into an anonymous form.

Currently, the principal place in which the OMA holds Personal Information is the City of Toronto.

## **Protection of Personal Information**

The OMA endeavours to maintain appropriate physical, procedural and technical safeguards with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

The OMA further protects Personal Information by restricting access to it to those employees that the management of the OMA has determined need to know that information in order that we may provide our products, services or information.

If any third-party individual or organization misuses Personal Information provided for the purpose of providing services to or for the OMA, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between the OMA and the offending party.

## **Access To Your Personal Information**

On written request the OMA permits individuals the reasonable right of access and review of his or her Personal Information. Such requests will be fulfilled within a reasonable time and no later than 30 days following the request.

If an individual identifies incorrect personal information in OMA's possession, OMA will correct or delete that information in accordance with the individual's direction.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

The OMA will not charge a member for verifying or correcting his or her Personal Information.



In the event of questions about this policy or any matters related to the collection, use and disclosure of personal information, please contact:

Ontario Medical Association Privacy Officer  
150 Bloor St. West, Suite 900  
Toronto, ON M5S 3C1  
Email: [privacy@oma.org](mailto:privacy@oma.org)