

## ABELSOFT INC.

# PATIENT PRIVACY POLICY

### Definitions

In this Policy, the following terms are used as follows:

**Privacy Officer:** The person within ABELSoft who is responsible for ensuring compliance with privacy obligations, including this Policy, with respect to the collection, use, disclosure and handling of personal information by ABELSoft and its authorized agents.

**Collection:** Refers to the act of gathering, acquiring, recording or obtaining personal information from any source.

**Disclosure:** The act of making personal information available to others outside ABELSoft.

**Patient Information:** Personal information about an identifiable patient that is recorded in any form, including personal health information such as a patient's treatment or medical history. Patient information does not include aggregate information that cannot be associated with a specific individual.

**Retention:** Refers to the act of keeping patient information as long as necessary to fulfill the stated purposes, or as long as otherwise specified by law.

**Use:** Refers to the treatment, handling and management of patient information by ABELSoft.

ABELSoft is committed to protecting and securing the patient information entrusted to us by clients who use ABELMed or ABELDent. We take great care in managing patient information that may be shared with us, and have taken important steps to support your compliance with the provincial health privacy statutes that apply to you. This Privacy Policy stands as a reflection of ABELSoft's commitment to privacy and is based on the *Canadian Standards Association Model Code for the Protection of Personal Information* (CAN/CSA-Q830-96).

## **1 . Accountability**

*ABELSoft is responsible for personal information under its control. Toward that end, we have established internal procedures to comply with this Policy and have designated a Privacy Officer to be accountable for compliance with the following principles.*

1.1. Responsibility for ensuring compliance with the provisions inherent in this Policy rests with the Privacy Officer of ABELSoft. The Privacy Officer will delegate responsibilities to one or more employees as needed to oversee the continued protection of patient information.

1.2. ABELSoft remains accountable at all times for any patient information in our possession or control. We ensure that any of our third party service providers, including cloud providers, provide a comparable level of protection if patient information is being housed by them.

## **2. Identifying Purposes for Collection of Personal Information**

*ABELSoft identifies the purposes for which personal information is collected at or before the time the information is collected.*

2.1. ABELSoft only collects patient information for the following purposes:

- a) to convert our clients' patient data into a format that is compatible with the use of ABELMed or ABELDent;
- b) to provide support services on an as-needed basis, and assist clients with any technical difficulties they may experience when using an ABELSoft product;
- c) to securely host patient data on behalf of a client, if hosting services are required;
- d) to provide secure back-up services to the client as requested; and
- e) to meet any legal and regulatory requirements that are imposed upon ABELSoft from time to time.

2.2. Upon request, the ABELSoft Privacy Officer will further elaborate on these purposes or refer the requesting individual to a designated person within ABELSoft who shall explain these purposes.

### **3. Obtaining Consent for Collection, Use or Disclosure of Personal Information**

*Knowledge and consent is required for the collection, use or disclosure of personal information, except where inappropriate.*

3.1. ABELSoft relies entirely on the patient's treating physician/dentist to obtain consent for the collection of patient information.

3.2. Since ABELSoft acts as an agent to our clients, consent is not required for the use of ABELMed or ABELDent.

### **4. Limiting Collection, Use and Disclosure of Personal Information**

*ABELSoft limits the collection, use and disclosure of personal information to that which is necessary for purposes identified by ABELSoft.*

4.1. ABELSoft only uses patient information for the purposes identified in section 2.1.

4.2. Development and testing work conducted by ABELSoft, as we enhance our software or offer additional features to our clients, only takes place using dummy or fully scrambled data that does not identify a real patient.

4.3. In the context of offering support services to ABELMed or ABELDent users, our support technicians may request access to your system. In most cases, the client's concerns can be addressed without collecting patient information. However, in some contexts, limited patient information must be copied to, and temporarily stored on, ABELSoft's secure servers in order to further test and resolve an issue.

4.4. ABELSoft does not disclose any patient information to third parties for marketing or any other commercial purposes.

### **5. Limiting Retention of Personal Information**

*ABELSoft retains personal information as long as necessary for the fulfillment of identified purposes, or as required by law.*

5.1. Patient information retention practices are dictated by our clients. Logs, controls and warnings built into ABELMed and ABELDent prevent the inadvertent destruction of patient information.

5.2. When ABELSoft converts data to a format that is acceptable to ABELMed and ABELDent, patient information is immediately deleted from our systems upon successful conversion.

5.3. If patient information is collected from our clients' servers for support purposes, this data is only kept long enough to resolve the support case, and is then diligently destroyed.

5.4. If back-up services are provided by ABELSoft, patient data is retained in and can be restored from secure back-ups.

5.5. Upon written request and confirmation, ABELSoft will make reasonable efforts to assist a client meet its data retention and destruction schedules. Keep in mind however that data may persist in back-up storage spaces for a period of time before being overwritten.

## **6. Accuracy of Personal Information**

*ABELSoft makes reasonable efforts to keep personal information as accurate, complete and up-to-date as is necessary to fulfil the purposes for which the information is to be used.*

6.1. ABELSoft relies upon the patient's treating physician or dentist to ensure accuracy of the information entered into ABELMed and ABELDent respectively.

6.2. ABELSoft has taken steps to ensure that data integrity is supported by our software. For example, when financial or clinical transactions or notes are added or edited by users with the access privileges to do so, such content changes are traced to the identity of the user. To maintain an accurate history of changes, deletion of these record type marks the record for deletion without actually destroying the record.

## **7. Security Safeguards**

*ABELSoft protects personal information with security safeguards appropriate to the sensitivity of the information.*

7.1. With the use of appropriate internal physical, administrative and technical security measures, ABELSoft protects patient information against a variety of risks, such as, loss, theft, unauthorized access, disclosure, copying, use, modification or destruction of such information.

7.2. Access to patient information is only given on a need-to-know basis. For example, even in the support context, a patient's unique system generated identification number is used rather than patient name.

7.3. Training on the importance of privacy best practices and protecting client and patient information is provided to all ABELSoft staff.

7.4. Security features available in the software to assist clients embrace privacy best practice include, but are not limited to:

- a) Role-based security controls are in place. For example, restrictions are in place for who is able to view health information, whether added by a patient (e.g. a health history form) or a provider (e.g. clinical notes);
- b) Strong passwords are enforced by the software with specific complexity rules: A minimum of 8 digits, and three of the following: Lowercase, Uppercase, Numbers, Special Characters. The client is responsible for ensuring passwords are not written down or shared;
- c) When the client relies on ABELSoft for data hosting, end-to-end cloud encryption is used to secure data in transit and at rest;
- d) The software automatically locks after an adjustable timeout period of inactivity. The user must enter their password to get back into the system; and
- e) Record-level activity can be tracked by username. The client is responsible for ensuring users log in using unique usernames to allow transparency of their actions.

## **8. Openness Concerning Policies and Practices**

*ABELSoft makes readily available specific information about its personal information management practices upon request.*

8.1. This Privacy Policy serves to ensure we are open and transparent about our practices. You will be immediately notified if we make any changes to this Policy.

8.2. ABELSoft may refer a patient to their treating physician or dentist if they inquire directly with us about privacy practices that are not under ABELSoft's control.

8.3 Upon request, ABELSoft will provide documentation to clients that provide further information about our privacy management program. For example, ABELSoft has a data breach response procedure in place that requires timely client notification if ABELSoft ever experiences a data security breach.

## **9. Access to One's Own Personal Information**

*ABELSoft informs individuals of the existence of his or her personal information upon request, and how to obtain access to such information.*

9.1. Patients who want access to their own electronic information will be directed to their treating physician or dentist.

9.2. It is our clients' responsibility to ensure that access to personal health information is provided in accordance with applicable health privacy laws.

## **10. Challenging Compliance**

*An individual shall address a challenge concerning ABELSoft's compliance with the principles set out in this Policy to the Privacy Officer.*

10.1. Any inquiries by individuals with regards to ABELSoft's handling of patient information shall be promptly addressed.

10.2. Any complaints concerning compliance with this Privacy Policy shall be immediately investigated by ABELSoft. If a complaint is found to be justified, we will take appropriate measures to resolve the complaint including, if necessary, amending our policies and practices.

For more information please contact:

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