



OCA Privacy Policies

Privacy of personal information is an important principle to the Ontario Chiropractic Association (OCA). We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the appropriate provision of the products and services we provide to our members in our role as a professional association. We also try to be open and transparent as to how we handle personal information. The following describes our privacy policies.

1. What is personal information?

Personal information is information about an identifiable individual, including that which relates to their personal characteristics (i.e. gender, age, income, home address or phone number, ethnic background, family status), their health (i.e. health history, health conditions, health services received by them), or their activities or views (i.e. religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is not to be confused with business information (i.e. an individual's business address and telephone number), which is not protected by PIPEDA, the Personal Information Protection and Electronic Documents Act, an act of the federal government.

2. Who we are

In existence since 1929, the Ontario Chiropractic Association is a voluntary, not-for-profit professional association, representing chiropractors in Ontario. Our mission is to serve our members and the public by advancing the understanding and use of chiropractic care.

3. The personal information we collect and how we use it

3.1 Program Participation

The OCA will maintain a database of **Partnership4BetterHealth**, hereby referred to as "**Partnership**", registrants for internal performance metrics, general communication and planning purposes.

3.2 Enrollment Data

We collect personal information from potential members upon enrollment including, but not limited to, name, contact information, demographic identifiers (e.g.: age and gender) and other relevant information



The purpose of this collection is to ensure our members qualify for participation in the **Partnership** and to provide the OCA with public opinions and feedback related to the chiropractic practice. The OCA will use this information for the purposes of analysis.

3.3 Member Surveys

The OCA will conduct information gathering initiatives including but not limited to surveys, polls and open questions on a variety of topics gathering general information and opinions. This data is saved on password protected hard drives and cloud-based storage.

3.4 Research

The OCA performs statistical research with the data available through its **Partnership** database and Vision Control software. This data is used by OCA to identify trends in healthcare. Users adhere to strict privacy and confidentiality principles. This research is used in the OCA advocacy efforts.

3.5 Technical Support

Vision Critical on behalf of the OCA will provide basic technical support. Technical Support includes explanation and guidance on features within the parameters of the software user interface (“Technical Support”). Requests for Technical Support shall be submitted by the Designated Support Contact by submitting a “Case” from the Vision Critical Help Center which is directly accessible from the Sparq Software, by Live Chat from the Vision Critical Help Center, by e-mail to support@visioncritical.com, or by telephone (North America Toll Free: 1.866.482.6838, UK Toll Free: 0.800.032.3966, Australia Toll Free: 1.800.687.772 and Direct: +1.604.629.6789). Technical Support is provided by Vision Critical 8:00AM to 6:00PM local time, in all time zones, Monday through Friday, except on Christmas Day and New Years day locally and hours may be reduced on local statutory holidays.

Please see [Vision Critical Technical Support Policy](#) for more information.

4. Security

4.1 Data Security

Vision Critical on behalf of the OCA houses the Solution in enterprise class data centres that provide (a) Independent annual audit reports of their security and availability capabilities. Such reports include but are not limited to: AICPA SSAE16 SOC1, AICPA AT100 Trust Principles SOC2 audit reports or ISO27001 certifications; (b) Redundant cooling, fire suppression, power and communications; and (c) 24x7 guard services, physical access control and video surveillance.



4.2 Infrastructure Security

Vision Critical on behalf of the OCA has implemented the following security mechanisms: (a) The Solution is protected by firewalls or functionally equivalent technology that restricts traffic to only that which is required to provide the service; (b) Network traffic into the networking hosting the Solution is monitored by intrusion detection; (c) All access to the Solution and its supporting infrastructure is centrally logged; (d) 24/7 automated monitoring for malicious activity; (e) Bastion hosts and two factor authenticated VPN access into the Production Network; and (f) Anti-virus software.

Please see [Vision Critical Data Protection Schedule](#) for more information.

5. Disclosure of data

The OCA does not disclose information it collects from the **Partnership** with any external parties. The statistical analysis of the information collected may be shared but no personally identifiable information is provided with such disclosures.

The OCA partners with third party contractors on occasion. When such contractors will have access to member data they are required to sign a non-disclosure agreement prior to starting their work with the OCA and maintain your confidentiality. They are prohibited from using your personal information for any purposes other than those they were contracted to perform.

6. External Regulation

Various government agencies (Canada Revenue Agency, Office of the Privacy Commissioner of Canada, Human Rights Commission, Ontario Ministry of Finance, Ontario Ministry of Labour, etc.) have the authority to review our files and interview our staff as part of their mandates. External regulators have their own strict privacy obligations.

7. Your data, your rights

With only a few exceptions, OCA **Partnership** members and former **Partnership** members have the right to see what personal information we hold. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (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.

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 explain the reasons.



If you believe there is a mistake in the personal information we maintain in our files, 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 to support your request. Where we agree that we have made a mistake, we will make the correction and notify anyone to whom we have sent this information. If we do not agree that we have made a mistake, we will still agree to include in our records a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

8. Internet Privacy

Cookies: Cookies are small files or parts of files stored on a World Wide Web user's computer, created and subsequently read by a website server, and containing personal information, such as a user identification code, customized preferences, or a record of pages visited.

8.1 Sparq Cookies

Vision Critical's Sparq platform sets a number of cookies in order to function properly and to facilitate authentication, remember preferences, and maintain sessions. Vision Critical clients who use the Sparq platform, their community members, and Vision Critical's own community members will receive these cookies when interacting with the platform. Generally, users and community members may not opt-out of these cookies directly, and we recommend that they do not delete or block these cookies to ensure a proper user experience. Most of these cookies are proprietary, although a small number are generated by third parties. For more information on Sparq cookies, please see the help article located [here](#).

8.2 Linking of Cookie Data With Other Data

Information gathered through usage of a cookie is not generally linked to any direct personal identifiers (e.g., your name or e-mail address). Once you submit personal data on our sites however (e.g., by signing up to receive information from us, becoming a customer, etc.), we may link such personal data with cookies or other data that are associated with your visit(s) to our Site. This linkage allows us to create a 'profile' of your preferences so that we may tailor Site content, offers, and promotions to your interests.

Please see [Vision Critical Cookie Policy](#) for more information.

8.3 Content

Content, including the information, names, images, pictures, logos and icons regarding or relating to the OCA, its products and services (or to third-party products and services) is



provided “as is” and on an “as available” basis. To the extent permitted by law, the OCA excludes all representations and warranties (whether express or implied by law), including implied warranties of satisfactory quality, fitness for a particular purpose, non-infringement, compatibility, security and accuracy. The OCA does not guarantee the timeliness, completeness or performance of the website or any of the content. While we try to ensure that all content provided by the OCA is correct at the time of publication, no responsibility is accepted by or on behalf of the OCA for any errors, omissions or inaccurate content on the website.

9. Changes to This Policy

We may change the terms of this Policy at any time at our sole discretion so please review it periodically.

10. Do you have any questions or concerns?

If you have any questions or concerns you may contact:

Dr. Benjamin Xafflorey
Ontario Chiropractic Association, Manager of the Privacy Office
416-860-7187
201-70 University Avenue
Toronto, Ontario
M5C2N8

If you wish to make a formal complaint about our privacy practices, you may do so in writing to our Privacy Officer. They will acknowledge receipt of your complaint, ensure that it is investigated promptly, and provide with a response in writing.

For general enquiries and in the absence of any applicable provincial legislation, the Office of the Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as an Ombudsman for privacy disputes. The Office of the Privacy Commissioner can be contacted at:

Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec
K1A 1H3

(819) 994-5444/ 1-800-282-1376 / www.priv.gc.ca