

This notice describes how medical information about you may be used and disclosed and how you can get access to this information. Please review this notice carefully.

Our Commitment to Your Privacy

In order to provide counseling services to you, The Church of Jesus Christ of Latter-day Saints Family Services of Canada ("Family Services") must collect, use, and disclose your health information and other personal information (referred to hereafter as "personal health information"). You have a right to know how we collect, use, and disclose your personal health information. You have a right to expect that we will use reasonable measures to keep your personal health information accurate, confidential, and secure.

We are committed to a high standard of privacy and comply with Canadian federal privacy legislation and provincial privacy legislation, as applicable. Family Services adopts the 10 privacy principles set forth in the Canada Standards Association Model Code for the Protection of Personal Information, which include:

- Accountability.
- Identifying purposes.
- Consent.
- Limiting collection.
- Limiting use, disclosure, and retention.
- Accuracy.
- Safeguards.
- Openness.
- Right of access.
- Challenging compliance.

To facilitate our operations, we may transfer your personal health information to our affiliated entities outside of Canada, including in the United States. Your personal health information thus may be stored, accessed, or processed in the United States or another foreign jurisdiction and may be subject to a lawful order made in that jurisdiction.

Family Services ensures that comparable levels of data protection are in place any time your personal health information is transferred to another jurisdiction and obligates all affiliated entities to comply with Canadian data privacy laws.

Collection of Personal Health Information

The primary purpose for which Family Services collects personal health information is to provide counseling or other health care services to you. In order to provide its services, Family Services collects personally identifying information such as your name, address, telephone number, financial information, date of birth, and gender. It also collects personal health information relating to your physical or mental health or to the provision of care or services to you. Family Services collects personal health information directly from you or from a person authorized to act on your behalf, as well as through our observations of you when you use our services.

Use of Your Personal Health Information

1. For Treatment

We use personal health information to assess your needs and the applicability of our services, to facilitate counseling and other health care services, and to monitor and evaluate your care. Your personal health information may be shared among those health care

providers who provide services to you. For example, your counselor might share information about you with another Family Services counselor in order to determine the most appropriate care for you.

2. For Payment

We may use or disclose your personal health information so that we can be paid by you or another party, including current or future bishops if they are paying any portion of the fee for the services we provide to you.

3. For Agency Operations

We use personal health information in order to run our office and ensure that you and our other clients receive quality care. For example, we may use your personal health information to review the care provided to you and to evaluate the performance of our staff.

As necessary, we will seek your consent to provide you with appointment reminders or other information that may be of interest to you. Please notify us in writing if you do not want us to contact you to remind you of your appointments.

4. Special Situations

We may use or disclose your personal health information or other information you provide to us without your permission for several reasons. These reasons may include:

- When we believe that disclosure is necessary to prevent injury, a serious threat to your health and safety, or a serious threat to the health and safety of another person.
- When permitted or required by law.
- When required by law to report unlawful activity or misconduct of a serious nature, including suspected abuse or neglect.
- In response to a court order, subpoena, warrant, summons, or similar process.

Other Uses and Disclosures of Personal Health Information

Except where otherwise required or permitted by law, we will not use or disclose your personal health information without your written authorization.

Electronic Communications

If you and your counselor communicate electronically (or if you authorize your counselor to communicate electronically with an "authorized contact," such as your bishop), such as through email or text messaging, there is a risk that those messages could be intercepted or read by a third party. To minimize this risk, Family Services uses a secure email server and encrypts email messages and documents sent to clients that contain personal health information, according to industry standards. However, Family Services cannot ensure the security of your personal email provider. We also cannot ensure the security of other electronic communication providers used by you, your counselor, or other authorized contacts to whom you authorize Family Services to disclose your personal health information. By providing your email address or by authorizing communication through other electronic means, you acknowledge that you accept any associated risk. If you prefer not to permit email or other electronic communication, please notify your counselor.

Your Rights regarding Your Personal Health Information

You have a number of rights with regard to your personal health information:

- You may request an electronic or paper copy of your health information (subject to limited exceptions). This may include a copy of any forms presented to or signed by you or any other personal health information we have in our files.
- If you believe that the personal health information we have about you is incorrect or incomplete, you may ask us to amend the information.
- You may obtain an accounting of our use or disclosure of your personal health information.
- You have the right to withhold or withdraw your consent at any time by advising us in writing. This withdrawal of consent does not have retroactive effect (we cannot reverse any uses or disclosures we have already made with your permission).
- Subject to applicable privacy laws, you may request that we restrict or limit our use or disclosure of your personal health information for treatment-related purposes.
- Subject to applicable privacy laws, you have the right to be advised if your personal health information is lost, stolen, or accessed by unauthorized persons.

If you wish to exercise any of these rights, please contact the office in writing, as specified at the end of this notice.

Confidentiality in Couples, Family, and Group Counseling

If you participate in counseling that includes other individuals, such as marriage or family counseling, or if you are involved in group counseling, each participant in the counseling has the right to confidentiality regarding the information he or she shares, as well as the obligation to preserve the confidentiality of information shared by others. Family Services, however, cannot guarantee that all participants will honor these rights and obligations and maintain the confidentiality of information shared.

Changes to This Notice

We have the right to change this notice. If we do so, the new notice will apply to any personal health information we already have about you and to the personal health information that we receive in the future. We are required to abide by the most current notice that is in effect. We will post the most current notice in our office, or you may obtain a copy at any time by contacting us.

Information and Complaints

If you would like more information about our privacy practices, have any questions, concerns, or complaints, or wish to exercise any of your rights described herein, please contact our global chief data protection officer at:

- dataprivacyofficer@ChurchofJesusChrist.org
- 1-801-240-1187

You will not be penalized for filing a complaint.

If you are from Ontario and are not able to resolve a privacy issue directly with us, you have the right to make a complaint to the Privacy Commissioner of Ontario. Their office may be reached at:

- info@ipc.on.ca
- 1-800-387-0073

Other privacy regulators in Canada may be contacted as follows:

- Privacy Commissioner of Canada (federal) - 1-800-282-1376
- Privacy Commissioner of Alberta - 1-888-878-4044
- Privacy Commissioner for British Columbia - 1-800-663-7867
- New Brunswick Ombud - 1-877-755-2811
- Commission d'accès à l'information (Québec) - 1-888-528-7741

This notice is effective as of April 2022.