

Privacy Policy

Prairie Diagnostic Services (PDS) recognizes that an individual's personal privacy is an essential right to be protected. PDS understands the importance in maintaining client confidentiality and protecting personal information. Our relationship with those who participate in the services offered by PDS are founded on trust, to which PDS is committed to maintain. PDS shall be responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of laboratory activities. The laboratory shall inform the client in advance, of the information it intends to place in the public domain. Except for information that the client makes publicly available, or when agreed between the laboratory and the client, all other information is considered proprietary information and shall be regarded as confidential. Safeguards are in place that protect the individual's personal information in PDS's care and control. PDS does not sell, barter, trade, or give away personal information to third parties. PDS stores, maintains, and discloses personal information in conformity with the Personal Information Protection and Electronic Document Act (PIPEDA, 2015), as described further below.

A. An Overview

1. *What This Policy Covers*

This Privacy Policy applies to the personal information that is collected, used, or distributed about identifiable stakeholder(s) by PDS. The "stakeholder" or "stakeholders" can include owners, clients, customers, collaborators, applicants, and members of WCVI and PDS.

This Privacy Policy will not apply to the collection, use, or disclosure of personal information in the following ways: any personal information that has been anonymized by being aggregated in such a manner that it cannot be connected to a person; the name, title, business address, e-mail address, or telephone number of an employee of an organization; information that is publicly available.

2. *Collection of Personal Information*

Personal information that may be collected, used, or disclosed by PDS may include but is not limited to the following:

- Name
- Address
- Telephone/Fax numbers
- E-mail addresses
- Credit Card Information
- Payment and Banking Information
- Name of Employer or Business
- Particulars (including opinions, evaluations, disciplinary actions)

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3. Guidelines for Online Users

PDS may collect non-identifying information about our visitors to create summary statistics and to determine the level of interest in our website. That collected information may include date, time, and the web browser used to access our website. Information about the user's site usage and IP Addresses may also be collected through our server log files.

PDS will not collect personal information from cookies, nor will it collect identifying information about visitors to our website. Our website does not link IP addresses to any personally identifiable information.

Please be advised that personal information that is conveyed to PDS employees using email is done at the user's risk and on the understanding that such information may be accessible to third parties. Voluntarily disclosed information can be intercepted, collected, used, and disclosed by such third parties. PDS is not liable or held responsible for any damages that may result from such user activity.

B. Application of the Ten Principle Code

This Privacy Policy ensures that the ten principles for protecting personal information described in the PIPEDA are adhered to and upheld in all PDS's dealings with stakeholders. As permitted by PIPEDA and its regulations, the language in this Privacy Policy has been tailored to reflect personal information issues specific to PDS.

PDS applies the ten principles of PIPEDA as follows:

1. Accountability

PDS is fully responsible for the maintenance and protection of any information received from a stakeholder. In addition, PDS has a designated Privacy Officer who is accountable for PDS's compliance with respect to the ten privacy principles.

PDS will transfer personal information to third parties only with the express consent of the stakeholders, or where required by law. All personal information that is transferred is protected by entering into legal agreements with such third parties. These legal agreements seek to ensure that the third parties employ comparable levels of control.

To ensure compliance with this Privacy Policy, PDS has taken the following measures:

- Developed procedures to receive and respond to complaints and inquiries.
- Developed and distributed information that explains PDS's policies and procedures respecting personal information.
- Trained our staff about policies and practices respecting personal information.

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2. Identifying Purposes

When required, PDS shall document the purpose for collecting information. Whether at the time of collection, prior, or afterwards, PDS is always clear and open with stakeholders regarding the intended purpose and use of collected information. To do so, PDS will specify either orally, electronically, or in writing the identified purposes to stakeholders at or before the time personal information is collected. Upon request, persons collecting personal information will explain these identified purposes, or refer the individuals to PDS's Privacy Officer who will explain the purposes.

Personal information that has already been collected from stakeholders will not be used or disclosed for any new purposes without first identifying and documenting the new purpose and obtaining the prior consent of the stakeholder, unless required by law.

PDS will typically collect personal information for the only following limited purposes:

- a. For support of veterinary diagnoses; PDS will effectively provide laboratory results to stakeholders. Under the Health of Animals Act, to assure identity of test results and to meet legal reporting requirements, PDS must be able to identify the person who owns or possesses the animal, sample or portion. PDS will obtain the owner's name and contact information of submissions for analysis, and where different than the latter, information regarding the current location of the animal, sample or portion.
- b. For financial support from Western College of Veterinary Medicine (WCVN), PDS supplies case data to support the teaching of veterinary professionals. WCVN personnel are required to sign PDS confidentiality agreements to gain access to the PDS database for the provision of diagnostic support to PDS, teaching and research purposes.
- c. For information and services PDS provides to stakeholders, PDS will use personal information to create mailing lists. These mailing lists are used to inform those listed individuals of corporate changes, opportunities, and upcoming events such as training or conferences to those interested. PDS obtains and maintains sufficient personal information to provide these services. By providing written instruction to PDS's Privacy Officer, stakeholders can request their information to not be used for such marketing.
- d. As may be required to carry out normal business activities, PDS will collect relevant personal information.

3. Consent

As a condition of PDS providing services to stakeholders, stakeholders are given the purpose for collecting their information. PDS is required to seek stakeholder consent to collect, use, or disclose that personal information. Consent may be given verbally, in writing, or electronically, depending on the nature of the product or service. PDS may consider implied consent appropriate when the information is less sensitive. Consent may also be given by an authorized representative. Consent will not be obtained

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through deception. Clients provide consent by completing the **Privacy Policy and Service Conditions Consent Form.**

In obtaining consent, PDS will use reasonable efforts to ensure that a stakeholder is advised of the identified purposes for which personal information is collected and will be used and/or disclosed. Purposes are identified in a manner that can be reasonably understood by the stakeholder. In addition to obtaining consent, the reasonable expectations of the stakeholder are relevant.

A stakeholder may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Stakeholders may contact PDS at the address below for more information.

4. Limiting Collection

PDS will not collect personal information indiscriminately. Consent with respect to collection is not obtained through deception. Information is collected and limited to the details necessary for the purposes identified. Our standardized forms ensure that only information that is required is collected by fair and lawful means. This prevents PDS from collecting information by misleading or deceiving stakeholders about the purpose for collected information.

5. Limiting Use, Disclosure, and Retention

PDS does not use personal information for purposes other than those for which it was originally collected unless it has first documented the new identified purpose and obtained the consent of the stakeholder(s) from whom such information was received or as required by law.

PDS will keep personal information only if it remains necessary or relevant for the identified purpose or as required by law. Depending on the circumstances where personal information has been used to make a decision about a stakeholder, PDS shall retain information for a period of time that is reasonably sufficient to allow for access by the stakeholder, either the actual information or the rationale for making the decision. Paper records are generally maintained for up to 5 years. Electronic diagnostic records which include some personal information are maintained indefinitely as part of the diagnostic, surveillance and teaching database.

Any personal information kept by PDS is disposed of or destroyed once it is no longer needed to meet the purposes for which it was collected. To prevent unauthorized parties from gaining access to the personal information, PDS ensures appropriate measures regarding the destruction or disposal of that information.

6. Accuracy

PDS will make reasonable efforts to ensure a stakeholder's information is kept accurate, complete, and current. Information is updated as necessary for the information's original purpose. Information that is used on an ongoing basis, including information disclosed to third parties, should generally be accurate and current, unless limits to the requirements for accuracy are clearly set out.

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7. Safeguards

There are different methods of security safeguards within PDS that protect sensitive personal information against risks such as copying, destruction, loss, modification, unauthorized access, or use. PDS has physical, organizational, and technological safeguards measures in place that will protect the stakeholders' information. PDS employees who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect the information.

8. Openness

PDS ensures that PDS's policies and practices with respect to the management of information are readily available.

The PDS Privacy Officer is accountable for the policies and practices related to the Privacy Policy. Stakeholders may contact the Privacy Officer to obtain details about the type of personal information that PDS holds, explanations of PDS's policies, standards, or codes, and to know what personal information is made available to related organizations.

If you have any concerns or wish to access our policies and practices, contact our Privacy Officer to address an issue or to explain the policies in further details.

9. Individual Access

Upon a written request with sufficient information, PDS will inform individuals of the existence of any of their personal information in our care and control. PDS will provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information. PDS shall respond within a reasonable time to such requests. The information provided by PDS will be used for only this purpose.

PDS will be as specific as possible in providing an account of disclosures to third parties. When providing an account of this type of disclosure, PDS will provide a list of organizations to which the personal information has been disclosed to.

10. Challenging Compliance

PDS has designated its Privacy Officer as accountable for the day-to-day care and control of personal information. The Privacy Officer will receive and respond to all information requests regarding the PDS Privacy Policy, procedures, and stakeholders' inquiries regarding their personal information. If a stakeholder wishes their personal information to be added or removed from any of the lists or databases that PDS maintains, a written request to do so can be submitted to the Privacy Officer.

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Stakeholders can challenge the completeness of their personal information. If they can successfully demonstrate that an error in the accuracy or completeness exists, PDS will amend their personal information appropriately. Any unresolved differences to accuracy or completeness will be noted in their file. Where appropriate, PDS will transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Procedures are in place to receive and respond to complaints or inquiries about the policies and practices relating to the handling of personal information. Individuals will be informed about the existence of these procedures, as well as the existence of relevant complaint procedures. PDS will investigate and respond in a timely manner to all complaints received. If a complaint is found to be justified, PDS will take appropriate measures to resolve the matter, including if necessary, amending our policies and procedures.

C. How to Add, Remove, or Amend Personal Information

If at any time, stakeholders wish to amend their personal information with us or have their personal information removed from our records, inform PDS in writing at the following:

Privacy Officer
Prairie Diagnostic Services Inc.
52 Campus Drive
Saskatoon, SK S7N 5B4
Email: pds.info@usask.ca

Please note that further information can be obtained as well as a copy of the PIPEDA through the Office of the Privacy Commissioner of Canada's website at www.priv.gc.ca.

D. Changes to the Privacy Policy

PDS reserves the right to modify or remove this Privacy Policy at its discretion and without notice.

Approved by: *Karen Moline*
PDS Privacy Officer

Date: *August 28, 2023*

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