

Privacy Policy

At **CREW Psychotherapy and Trauma Services**, we value your privacy and are committed to maintaining the confidentiality, security, and integrity of your personal information. This Privacy Policy outlines how we collect, use, disclose, and protect your personal information, ensuring compliance with applicable Canadian privacy laws, including the **Personal Information Protection and Electronic Documents Act (PIPEDA)**, **Ontario's Personal Health Information Protection Act (PHIPA)**, and other relevant federal and provincial regulations.

By accessing and using our website, services, and resources, you acknowledge and consent to the terms outlined in this Privacy Policy. If you do not agree with any part of this Privacy Policy, you should refrain from using our website and services.

1. DEFINITIONS

In this Privacy Policy:

- **"Agreement"** refers to all documents, including the Credit Card Authorization Form, between you and CREW Psychotherapy and Trauma Services.
- **"Client," "You," or "Your"** refers to any purchaser, client, or user of the services, courses, and resources offered by CREW Psychotherapy and Trauma Services.
- **"Company," "We," or "Us"** refers to CREW Psychotherapy and Trauma Services, a company operating in Ontario, Canada.
- **"Website"** refers to the website through which we provide our services, including all subdomains.
- **"Terms and Conditions"** refers to the terms of use governing our services, available on our website.

2. PERSONAL INFORMATION

For the purposes of this Privacy Policy, **"Personal Information"** refers to any information that can identify you as an individual, including but not limited to your name, contact details, payment information, health records, and any other data that can be used to identify you directly or indirectly. Personal information does not include anonymized or de-identified data or information that is publicly available from government records.

We collect **personal health information (PHI)** as part of our services. PHI includes health-related data such as medical history, treatment plans, psychological assessments, and therapy notes. This information is subject to strict confidentiality and is collected, stored, and used in compliance with the **Personal Health Information Protection Act (PHIPA)**, and other applicable legislation.

3. INFORMATION WE COLLECT

We collect personal information directly from you when you interact with our Website and services. The information we collect may include, but is not limited to:

- **User/Contact Information:** Name, email address, postal address, and phone number.
- **Billing Information:** Payment details, including credit card numbers, billing addresses, and related information required to process payments for services and courses.
- **Financial Information:** Debit/credit card numbers and other payment-related details required to process transactions.
- **Health Information:** Health history, treatment records, psychological evaluations, and any other personal health information you provide us as part of your engagement in therapy or other services.
- **Promotional Information:** Your participation in surveys, contests, newsletters, or promotional offers, including the information you voluntarily provide in connection with these activities.
- **Content Information:** Any personal information included in email, chat messages, or inquiries made to us regarding our services.
- **Order Information:** Information related to purchases, including billing information, payment details, and delivery addresses for physical goods or services.

We may also collect **non-personal information**, including data related to your browser type, IP address, referral site, and date/time of visits, which is used to analyze and improve the Website's functionality.

4. USE OF YOUR INFORMATION

We collect and use your personal information for the following purposes:

- **To Provide Services:** We use your personal information, including health information, to provide therapy services, process payments, and manage your account in accordance with our contractual obligations.
- **Billing and Payment Processing:** Your financial information is used to process payments and verify transactions, ensuring proper billing for our services.
- **Compliance with Legal Obligations:** We use your personal information to comply with legal obligations under Canadian privacy laws, including **PHIPA** for handling personal health information and **PIPEDA** for other types of personal information.
- **Customer Support:** To respond to inquiries, provide assistance, and resolve complaints, ensuring we meet our obligations and provide you with the best service possible.
- **Marketing and Promotions:** With your consent, we may use your information to send promotional offers, newsletters, and information about our services. You can opt out of marketing communications at any time.
- **Security and Fraud Prevention:** We use personal information for fraud detection and to ensure the security of our services, transactions, and users.
- **Website Improvement:** We use non-personal information to analyze how users interact with the Website, identify trends, and improve the services we offer.

- **Research and Data Analytics:** We may use anonymized data for internal research, analysis, and business development purposes.

5. COOKIES AND TRACKING TECHNOLOGIES

Our Website uses cookies and similar tracking technologies to enhance user experience and analyze usage patterns. Cookies are small text files stored on your device by your web browser. You may choose to disable cookies through your browser settings, although this may affect the functionality of certain features on the Website.

6. ADVERTISING

We may partner with third-party advertisers who may use cookies and tracking technologies to deliver targeted ads. These advertisers may collect information about your visits to our Website and other websites to serve more relevant advertisements. This Privacy Policy covers only our use of cookies and does not extend to third-party advertisers.

7. EMBEDDED CONTENT

The Website may include embedded content (e.g., videos, articles, or images) from third-party websites. Embedded content behaves in the same way as if you visited the third-party website directly. These external websites may collect data about you, use cookies, and track your interactions with their content. We are not responsible for the privacy practices of third-party websites.

8. DISCLOSURE OF YOUR DATA

We do not sell or rent your personal information to third parties. We only share your information in the following circumstances:

- **Third-Party Service Providers:** We may share your data with third-party vendors who assist us in processing payments, providing customer support, delivering marketing communications, or performing other business operations. These third parties are contractually obligated to protect your information and use it solely for the purposes for which it was shared.
- **Legal Obligations:** We may disclose your personal information if required by law, such as in response to a subpoena, court order, or government request, or when we believe in good faith that such disclosure is necessary to protect our legal rights, property, or the safety of others.
- **Mergers and Acquisitions:** In the event of a merger, acquisition, or sale of our business or assets, your personal information may be transferred as part of the transaction.

9. CLIENT FILE RECORD KEEPING

In accordance with **PHIPA** and other applicable laws, we maintain client records, including personal health information, for a period of at least **10 years** after the last date of service or after the date that a youth turns 18 years of age. This is in line with the regulatory requirements for healthcare professionals in Ontario. After this retention period, we will securely destroy or anonymize the records unless there is a legal or professional obligation to retain them longer.

Clients have the right to access and request amendments to their personal health information as permitted under PHIPA. Should you wish to access or correct any of your records, please contact us at the details provided below.

10. DATA RETENTION

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including for legal, accounting, and reporting purposes. After the required retention period, we will securely destroy or anonymize your information unless further retention is required by law.

11. DATA SECURITY

We implement reasonable administrative, technical, and physical safeguards to protect your personal information from unauthorized access, disclosure, alteration, or destruction. While we strive to protect your data, no method of transmission over the internet or method of electronic storage is entirely secure. Therefore, we cannot guarantee absolute security of your information.

12. PRIVACY POLICY CHANGES

We may update this Privacy Policy from time to time. Any changes will be posted on this page, and the updated Privacy Policy will be effective as of the date indicated. We encourage you to review this Privacy Policy regularly to stay informed of any changes.

13. CONTACT US

If you have any questions, concerns, or requests regarding this Privacy Policy or how we handle your personal information, please contact us:

Email: admin@crewservices.ca

Mailing Address: 701 Rossland Rd East, Unit 209C, Whitby, ON, L1N 8Y9

This policy is reviewed and updated regularly to ensure compliance with applicable privacy laws in Canada, including PIPEDA, PHIPA, and Ontario's privacy regulations.

Last Updated: February 15, 2025