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## **GROW PT PRIVACY POLICY**

Privacy of personal information is an important principle to GROW PT, LLC. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services we provide. We also strive to be open and transparent as to how we handle personal information. This document describes our privacy policies.

**WHAT IS PERSONAL INFORMATION?** Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g. gender, age, income, home address or phone number, ethnic background, family status), their health (e.g. health history, health conditions, health services received by them), or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is to be contrasted with business information (e.g. an individual's business address and telephone number), which is not protected by privacy legislation.

### **WHO WE ARE**

GROW PT is an education and exercise based Physical Therapy practice that is the LLC of Annie Linville, PT (license #P16243). We use a number of consultants and agencies that may, in the course of their duties, have limited access to personal information we hold. These include computer consultants, website managers, office staff and cleaners. We restrict their access to any personal information we hold as much as reasonably possible. We also have their assurance that they follow appropriate privacy principles.

### **WE COLLECT PERSONAL INFORMATION**

#### **Primary Purposes About Clients**

Like all physical therapists, we collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide physical therapy evaluation and treatment. For example, we collect information about a client's health history, including their family history, physical condition and function and social situation in order to help us assess what their health needs are, to advise them of their options and then to provide the health care they choose to have. A second primary purpose is to obtain a baseline of health and social information so that in providing on-going health services we can identify changes that are occurring over time. It would be rare for us to collect such information without the client's express consent, but this might occur in an emergency (e.g. the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g. a family member passing a message on from our client and we have reason to believe that the message is not genuine).

#### **About Members of the General Public**

For members of the general public, our primary purpose for collecting personal information are to provide notice of special events (e.g. a seminar or conference) or to make them aware



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of physical therapy services in general or our clinic in particular. For example, while we try to work contact information where possible, we might collect home addresses, fax numbers and email addresses. We try to obtain consent before using any such personal information, but where this is not, for any reason, possible, we will upon request immediately remove any personal information from our distribution list.

### **We Collect Personal Information: Related and Secondary Purposes**

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

1. To secure payment for goods or services.
2. To advise clients/patients of the need for follow up services.
3. To advise clients and others of special events or opportunities (e.g. a seminar, development of a new service, arrival of a new product) that we have available.
4. Our clinic looks at client reviews and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of staff. In addition, external consultants (e.g. auditors, lawyers, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing quality improvement reviews of our clinic, including reviewing client files and interviewing our staff.
5. Physical therapists are regulated by the Physical Therapy Board of North Carolina who may inspect our records and interview our staff as a part of their regulatory activities in the public interest. In addition, as professionals, we will report serious misconduct, incompetence or incapacity of other practitioners, whether they belong to other organizations or our own. Also, our organization believes that it should report information suggesting serious illegal behavior to the authorities. External regulators have their own strict privacy obligations. Sometimes these reports include personal information about our clients or other individuals to support the concern (e.g., improper services). Also, like all organizations, various government agencies have the authority to review our files and interview our staff as a part of their mandates. In these circumstances, we may consult with professionals (e.g. lawyers, accountants) who will investigate the matter and report back to us.
6. The cost of some goods/services provided by the organization to clients is paid for by third parties (insurance carries, medical savings plans, etc.). These third-party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.



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7. Clients or other individuals we deal with may have questions about our goods and services after they have been received. We also provide ongoing services for many of our clients over a period of months or years which our previous records are helpful. We retain our client information for a minimum of 10 years after the last contact to enable us to respond to those questions and provide these services (our regulatory Board also requires us to retain our client records).

8. If GROW PT or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the clinic’s records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who already agreed to buy the organization's business or its assets would be provided access to personal information and only for the purpose of completing their due diligence search prior to closing the purchase. You can choose not to be part of some of these related or secondary purposes (e.g. by declining to receive notice of special events or opportunities, by paying for your services in advance). We do not, however, have much choice about some of these related or secondary purposes (e.g. external regulation).

### **Protecting Personal Information**

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

1. Paper information is either under supervision or secured in a locked or restricted area.
2. Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital, as such signals are more difficult to intercept.
3. Paper information is transmitted through a sealed, addressed envelopes or boxes by reputable companies.
4. Electronic information is transmitted either through a direct line or where we are unsure of the security of the electronic transfer of information, identifying information is removed.
5. Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties in accordance with our privacy policy.
6. External consultants and agencies with access to personal information must enter into



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privacy agreements with us.

### **Retention and Destruction of Personal Information**

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our clients files for about 10 years. Our client and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away. We keep any personal information relating to our general correspondence (e.g. with people who are not clients) newsletters, seminars, and marketing activities for about six months after the newsletter ceases publication or a seminar marketing activity is over.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed. Alternatively, we may send some or the entire client file to our client.

### **You Can Look at Your Information**

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you have questions about (e.g. 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.

If there is a problem, 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 tell you the reason as best we can, as to why we cannot give you access.

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



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**ANY QUESTIONS?**

If you have a question or concern, please address it to Annie Linville, owner of GROW PT, LLC at [annie@growptcharlotte.com](mailto:annie@growptcharlotte.com). If you wish to make a formal complaint about our privacy practices, you may make it in writing to Annie Linville, PT at GROW PT, LLC. 2128 Remount Rd. Ste. A-1, Charlotte, NC, 28208. We will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.

If you have a concern about the professionalism or competence of our services or the mental or physical capacity of our staff, we would ask you to discuss those concerns with us. However, if we cannot satisfy your concerns, you are entitled to complain to our regulatory body:

North Carolina Board of Physical Therapy  
Examiners 8300 Health Park #233 Raleigh, NC  
27615 Phone: (919) 490-6393 Website:  
[www.ncptboard.org](http://www.ncptboard.org)