

# **\*\*CLINIC CONCIERGE — PRIVACY POLICY**

(PIPEDA-Compliant, Canada)\*\*

**Effective Date:** November 17th 2023

Clinic Concierge (“we,” “us,” “our”) is a Canadian, women-owned patient-acquisition service that connects cosmetic dental patients with verified clinics. We operate in compliance with the Personal Information Protection and Electronic Documents Act (**PIPEDA**) and follow strict privacy, security, and consent-based practices.

This Privacy Policy explains how we collect, use, disclose, store, and protect personal information for both **patients** and **clinics**, and outlines your rights under Canadian privacy law.

By using our website, submitting an intake form, or operating a clinic dashboard account, you consent to the practices described in this policy.

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## **1. Who This Policy Applies To**

This Privacy Policy applies to:

- Individuals (“patients”) submitting cosmetic dentistry inquiries
- Clinics using the Clinic Concierge platform
- Users browsing our website or interacting with our services
- Individuals receiving emails, SMS, or notifications from us

Our services are intended for **adults 18 years or older**. We do not knowingly collect information from minors.

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## **2. Information We Collect**

### **2.1 Patient Information (Collected via intake form, call, or text)**

We may collect the following:

- Full name
- City/region
- Phone and email (verified via OTP or validation)
- Treatment type (e.g., veneers, Invisalign, crowns)
- Desired case scope (number of units/teeth)
- Photos (optional)
- Budget range
- Timeline (“ready now,” “within 1 month,” “just exploring”)
- Additional notes about smile goals
- Call metadata, call transcripts, and/or call recordings
- Communication history and lead activity

Some fields may be optional; not all patients will complete every step.

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## **2.2 Clinic Information (Providers using our platform)**

We may collect:

- Clinic name, owner name, and contact details
- Clinic location(s)
- Business email and phone
- Billing details (credit card or invoicing preferences)
- Dashboard activity logs (login time, lead purchases, access timestamps)

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## **2.3 Automatically Collected Information**

When you access our website or dashboard:

- IP address
- Device type and browser
- Pages viewed and timestamps
- Cookie data (see Section 7)
- Referral URLs
- Basic analytics
- Session identifiers

This information helps improve security, performance, and user experience.

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## 3. How We Use Personal Information

We use patient and clinic information to:

- Verify, screen, and classify patient inquiries
- Match patients with local clinics
- Deliver verified cosmetic dentistry leads to clinics
- Operate and improve our website and dashboard
- Prevent fraud and maintain security
- Provide customer service and technical support
- Comply with Canadian laws and regulatory requirements
- Communicate with patients and clinics (email, SMS, platform notifications)
- Process payments and track purchase history for clinics

**We do NOT sell personal information to third parties.**

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## 4. How Leads Are Shared With Clinics

- A patient's information is **only** shared with a clinic **after the clinic purchases the lead**.
- Prior to purchase, clinics see only preview information (non-identifying).
- After purchase, the clinic receives:
  - Full contact details
  - Intake form responses
  - Call transcript or call recording (if available)

Once the lead is transferred:

**Clinics become independent data controllers under PIPEDA.**

Clinics are responsible for:

- Lawful use of patient data
- Secure storage and handling
- CASL/CAN-SPAM compliance for messages sent to the patient
- Honoring patient privacy and deletion requests
- Meeting all provincial and federal health information standards

Clinic Concierge is **not liable** for clinic actions or communication once a lead is purchased.

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## 5. Legal Basis for Collection (Consent)

By submitting information as a patient, you:

- Consent to being contacted by Clinic Concierge
- Consent to having your information screened and verified
- Consent to having your verified lead details shared with **one purchasing clinic only**

By using the dashboard as a clinic, you:

- Consent to data processing required to operate your account
- Consent to receiving lead alerts and service messages

Consent may be withdrawn at any time (see Section 11).

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## 6. Disclosure to Third Parties

We may disclose personal information to:

- Service providers assisting with:
  - Cloud hosting
  - Email delivery
  - Billing and payment processing
  - SMS/verification services
  - AI-assisted intake tools
- Legal authorities when required by law
- Regulators in cases of data inquiries or compliance investigations

We only work with providers that maintain strong privacy and security standards.

We **never** sell personal information or share it with advertisers.

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## 7. Cookies & Tracking Technologies

Our website uses cookies and similar technologies for:

- Session management

- Login authentication
- Analytics (e.g., site usage, traffic patterns)
- Performance optimization
- Optional advertising or retargeting (if enabled in the future)

Users may disable cookies in their browser; however, certain features may stop functioning.

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## 8. Marketing Communications

Patients and clinics may receive:

- Service updates
- Lead notifications
- Appointment reminders (if opted in)
- Newsletters or educational content
- Promotional offers related to Clinic Concierge services

You may unsubscribe at any time using:

- The unsubscribe link in any email
- “STOP” for SMS (where applicable)
- Emailing us at: **privacy@clinicconcierge.ca**

Transactional or security-related messages may still be sent.

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## 9. International Data Transfers

Some of our third-party providers may store or process data outside Canada (e.g., United States).

Where this occurs, we ensure:

- Contractual protections
- Encryption in transit and at rest
- That providers meet PIPEDA-equivalent standards

All international transfers occur strictly to operate the service.

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## 10. Security Measures

We use industry-standard security controls:

- Encryption
- Access controls
- Secure dashboard authentication
- Limited employee access
- Network and firewall protections
- Monitoring for suspicious activity

No method of transmission is perfectly secure, but we use strict safeguards to minimize risk.

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## 11. Your Rights (Patients & Clinics)

Under PIPEDA, you may request to:

- Access personal information we hold
- Correct inaccurate or outdated information
- Withdraw consent to certain uses

- Request deletion, where legally allowable

To exercise rights:

**Email:** [privacy@clinicconcierge.ca](mailto:privacy@clinicconcierge.ca)

We may need to verify your identity before proceeding.

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## 12. Retention & Deletion

We retain:

- Patient intake data only as long as necessary for lead delivery and compliance
- Clinic account data as long as the account remains active
- Billing records as required for financial and legal obligations

You may request deletion at any time (subject to legal retention rules).

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## 13. Privacy Complaints

We take privacy concerns seriously.

To file a complaint or raise a concern:

**Email:** [privacy@clinicconcierge.ca](mailto:privacy@clinicconcierge.ca)

If not resolved, you may contact:

**Office of the Privacy Commissioner of Canada:** [www.priv.gc.ca](http://www.priv.gc.ca)

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## 14. Changes to This Policy

We may update this Privacy Policy to reflect:



- operational changes
- compliance updates
- new features
- regulatory requirements

Updated versions will be posted with a revised effective date.

Continued use of our services constitutes acceptance of the updated policy.

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## 15. Contact Us

Clinic Concierge  
Vancouver, BC, Canada  
Email: **[privacy@clinicconcierge.ca](mailto:privacy@clinicconcierge.ca)**  
Website: **[www.clinicconcierge.ca](http://www.clinicconcierge.ca)**