

# Service Privacy Policy

Last Updated: April 16, 2025

Paul Lucas, (“Therapy When Life Sucks”, “Your Inner Solutions”, “we” or “us”) values the relationship it has with its clients and is committed to protecting their Personal Information in accordance with applicable laws. When used herein, the term “client” means any individual who is receiving or has signed up or requested to receive services from Paul Lucas.

## b) Partnership Services – 3<sup>rd</sup> Party

Paul Lucas uses 3<sup>rd</sup> party services in his counselling practice. This includes a secure server for appointments, case notes, intake forms, etc., a 3<sup>rd</sup> party to handle virtual appointments (video), one that handles text messages and also one that handles your financial payments. At the time of this update, the following 3<sup>rd</sup> parties are partnered with Paul Lucas and the services he provides:

- Janeapp – for bookings, virtual appointments, case notes, EHR. Janeapp is located in Canada.
- Simple Practice – for bookings, virtual appointments, case notes, EHR. Simple Practice is located in the United States. Simple Practice is HIPAA compliant and HiTrust Certified, a gold standard in the healthcare industry
- Whereby – for video sessions. Located in Ireland
- Stripe – for payments and billing. Located in various areas
- Text Messaging – located in the U.S

By receiving services from Paul, including submitting a contact form or a pre-screener form, you acknowledge that you have read and understood this Privacy Policy, and you agree and consent to the collection, use, and disclosure of your Personal Information in accordance with the terms set out below. **If you do not agree with this Privacy Policy, you must not supply your Personal Information to us.**

## **Background**

### **a) Paul Lucas**

Paul Lucas is a marriage and relationship counsellor who holds membership with the CCPA (Canadian Counsellors and Psychotherapist Association). He assists individuals and couples in their relationship using a coaching-style approach, with Relational Life Therapy being his main modality. He is not a psychotherapist and does not practice the Controlled Act of Psychotherapy. He is clinically supervised by a Registered Social Worker who holds a BSW degree.

## **Application of privacy policy**

This Privacy Policy describes Paul Lucas' Personal Information management policies and practices, including how Paul Lucas collects, uses and discloses Personal Information in the course of providing services.

## **Collection of personal information**

Paul Lucas may collect the following Personal Information from clients:

- name, contact information (including home address and email address), date of birth, religious affiliation(s), gender, employment status, Personal Health Information, and certain other Personal Information about the client
- credit card information and/or bank account information (where provided to us for the purposes of paying for the services); and
- other identifying information about the client that we did not request but that is provided by the client or any other person authorized to provide such information on the client's behalf.

We will always collect Personal Information by fair and lawful means. We may collect Personal Information from clients directly and/or from third parties (including our Partners), where we (and/or

those third parties) have obtained the client's consent to do so, or as otherwise required or permitted by applicable law. Generally, however, we collect Personal Information directly from clients when they voluntarily provide it in the course of accessing the Services and Partnership Services. For example, Personal Information will be collected when a client:

- completes the contact form, pre-screener, client profile or intake form;
- provides it to Paul Lucas in the course of the client sessions
- communicates with Paul Lucas via phone, email, text or secure messaging

In any event, we limit our collection of Personal Information to that which is necessary to fulfill the purposes identified in this Privacy Policy.

Paul Lucas' privacy practices are intended to comply with applicable privacy laws, including, without limitation, the Personal Health Information Protection Act (Ontario) ("PHIPA") and the Personal Information Protection and Electronic Documents Act (Canada)

("PIPEDA"). We will maintain the privacy of Personal Information as required by applicable privacy laws in applicable jurisdictions.

### **How we use client's personal information**

We use client's Personal Information for the following purposes:

- to provide mental health and assessment treatment services;
- to plan, administer and monitor the Services and Partnership Services;
- for quality control purposes;
- for billing purposes;
- to communicate with other therapists and healthcare workers for

clinical purposes. Paul de-identifies client personal information to maintain confidentiality

### **Access to client's personal information**

Client's Personal Information will be accessible to Paul Lucas and third party service providers on a "need-to-know" basis, such as for billing your credit card.

### **Disclosure of personal information**

Paul Lucas will maintain the client's Personal Information in strict compliance with this Privacy Policy, including by only disclosing Personal Information in accordance with applicable laws.

We identify to whom, and for what purposes, we may disclose Personal Information, at the time we collect such information from the client to whom it relates and obtain such client's consent to such disclosure except as required or permitted by applicable law. For example, in accordance with section 7(2)(b) of the Personal Information and Protection of Electronic Documents Act, Paul Lucas may - without the knowledge or consent of the client - use the client's Personal Information for the purpose of acting in respect of an emergency that threatens the life, health or security of an individual. In the event that we

are required by applicable law to disclose a client's Personal Information without their consent, we will aim to disclose only the specific information that is required in the circumstances and unless prohibited by applicable law from doing so, will inform the client about the disclosure.

### **Security and safeguards**

Information that we collect may be processed and stored on servers located in Canada, or outside of Canada. If Personal Information is processed and/or stored outside of Canada, it will be subject to the laws of the jurisdiction where it is processed and/or stored (as the case may be) and may be accessible to that jurisdiction's governments, courts, law enforcement or regulatory agencies. Paul Lucas uses standard security procedures and practices and other reasonable means appropriate to the nature of the Personal Information to protect it from theft, loss or unauthorized access, use (including modification and copying), disclosure or destruction.



Sometimes, unless we are otherwise prohibited, our employees, partners, and third-party service providers, may be located in other provinces or countries outside Canada, and your personal information may be subject to the laws of those provinces and countries. All such persons, whether or not they are located in Canada, are required to protect the confidentiality of your personal information in a manner that is consistent with our privacy policy and practices.

### **Retention of personal information**

We will use, disclose or retain Personal Information that clients provide to us for as long as necessary to fulfill the purposes for which that Personal Information was collected, and as permitted or required by applicable law.

### **Changes to our privacy policy**

Paul Lucas may, in its sole and absolute discretion, change this Privacy Policy from time to time. Paul Lucas will post a copy of the Privacy

Policy as changed on the Website. The top of the Privacy Policy will contain the date on which the Privacy Policy was last updated.

You should review the Privacy Policy from time to time. A client's continued use of the services provided by Paul Lucas constitutes his/her/their agreement to abide by the Privacy Policy as changed. If, at any point, a client objects to any term of the Privacy Policy, this client's sole recourse shall be to cease using the the Services.

### **Access, correction, or other requests**

Privacy Officer: Paul Lucas: [paul@therapywhenlifesucks.com](mailto:paul@therapywhenlifesucks.com)

Clients have the right to request access to the Personal Information we have collected about them. Clients may request their Personal Information by submitting a written request to our Chief Privacy Officer. If you believe there is a mistake in your Personal Information you have

the right to request that it be corrected, by sending a request to our Chief Privacy Officer. If you have any other questions about this Privacy Policy or our privacy-related practices and procedures, please contact our Chief Privacy Officer.