



Medical Identification Number for Canada
Numéro d'identification médicale du Canada

Code for the Protection of Personal Information

A. Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

The Executive Director (whose contact information appears at the end of this Code) has been designated by the Board of Directors as responsible for MINC#NIMC's compliance with the protection of personal information in accordance with this Code.

MINC#NIMC is responsible for the personal information under its control, including any personal information that it may transfer to a Prime User, Licensed User or third party service provider for processing. Prime Users and Licensed Users are required, as part of their agreements with MINC#NIMC to designate the individual(s) within their organization who are accountable for compliance with this Code, applicable personal information and privacy legislation, and the confidentiality and security provisions contained in the agreement.

Similarly, any person or organization with whom MINC#NIMC contracts as an information manager or otherwise have in place confidentiality and security provisions consistent with this Code, and which are to be monitored by MINC#NIMC.

MINC#NIMC conducts regular privacy and security audits by external reviewers. It also seeks advice on matters related to this Code from its Advisory Forum, which is composed of representatives of the Canadian Medical Forum.

B. Identifying Purposes

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

MINC#NIMC collects core personal information about individuals in order to assign them a unique lifetime identification number (MINC number). The MINC number, in combination with the core personal information, is used by Prime and Licensed Users for the reliable identification of individuals throughout the Canadian medical educational and licensing systems and in other regulatory, administrative and research contexts.

The further purpose of the MINC number is to enable Prime Users and Licensed Users to process, link, match and exchange information pertaining to physicians, both within their own organizations and with other Prime and Licensed Users, for specified Approved Purposes. A list of Licensed Users and their Approved Uses appears on the MINC website at www.minc-nimc.ca.

C. Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

Unless required by law, MINC#NIMC will only collect, use and disclose personal information and generate and assign a MINC number with the written consent of individuals. Before individuals consent to provide personal



information to MINC#NIMC and to have a MINC number assigned to them, they are informed of the purposes for collecting core personal information and generating a MINC number, the types of organizations that are or could become Licensed Users of the MINC number system, and the purposes that have been approved for using the MINC number system.

Prime Users work with MINC#NIMC to provide information to individuals about the MINC number system, and to seek each individual's signed consent to provide core personal information to MINC#NIMC so that a MINC number can be generated and assigned to them. Prime Users also supply the core personal information to MINC#NIMC once individuals have provided this consent.

This signed consent also authorizes disclosure by MINC#NIMC as follows:

- a) to Prime Users: MINC number plus core information (refer to Section D for core information), for regulatory purposes, and
- b) to Licensed Users: MINC number only, for Approved Purposes identified in their License Agreement.

Individuals may withdraw their consent to the use or disclosure of their core information and MINC number at any time. If consent is withdrawn, MINC#NIMC will retain the information in its database (for data integrity purposes), but will cease disclosing the MINC number and associated core information to any Users.

D. Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

MINC#NIMC collects core personal information from Prime Users to confirm identity before generating or confirming a MINC number. MINC#NIMC retains the core information in its system for the purposes of verifying that a MINC number has been issued to an individual, and for the unique identification and ongoing identity confirmation by Prime and Licensed Users.

The core personal information collected by MINC#NIMC is limited to that necessary to uniquely identify individuals and to confirm their identity. The core information includes:

- a) name(s),
- b) gender,
- c) date of birth,
- d) country of birth,
- e) university of medical degree,
- f) year of medical degree, and
- g) where necessary, further pieces of information that may be required to confirm identity.



E. Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

MINC#NIMC uses core information to generate or confirm a MINC number and to retain the core information and its associated MINC number in its system for the purposes of unique identification and ongoing identity confirmation by Prime and Licensed Users.

Prime Users have access for regulatory purposes to all core information and associated MINC numbers in the MINC system, and may retrieve records from MINC#NIMC by searching on a number of fields; for example, MINC number, name, date of birth, country of graduation, university of graduation. Prime Users can also upload information from the MINC system into their own systems, and maintain an independent record of the MINC number assigned to an individual.

Licensed Users only have access to the names and MINC numbers for their members/constituents, and can only conduct searches and retrieve records on the basis of these two fields. Licensed Users may also maintain their own independent record of the MINC number assigned to their members/constituents.

As part of their contractual agreements with MINC#NIMC, Prime Users and Licensed Users are restricted to using the MINC number for specified, Approved Purposes and in compliance with personal information and privacy laws.

Approved Purposes may include uniquely identifying individuals and the linking, matching, and exchange of personal information on the basis of the MINC number between MINC Users for purposes such as the compilation of statistics, the development of profiles, the administration of programs or benefits, the management of the health system and research.

The organizations that are Prime or Licensed Users of the MINC system, and the Approved Purposes that have been specified for each organization are available www.minc-nimc.ca. The types of organizations that might become future MINC system Licensed Users can also be found there.

As confirmation of identity may be required even after an individual has left Canada or died, the core personal information and the MINC number associated with it will be kept indefinitely.

The existence of core information linked to a MINC number on the MINC database does not in itself allow tracking of an individual. MINC#NIMC does not maintain current information as to an individual's whereabouts, whether an individual is alive or deceased, or the jurisdiction in Canada in which they might reside.

F. Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Prime Users supply MINC#NIMC with core information and upload it to the MINC database. Since Prime Users are generally in the best position to verify data accuracy, MINC#NIMC relies primarily on the Prime Users to ensure that the core personal information is accurate and complete. Prime Users also update or correct the core personal



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information, where appropriate; for example, a legal change of name or the discovery that incorrect information had previously been entered.

As a further means to confirm accuracy, when a MINC number is issued, the Prime User which registered them provides the person documentation of what core information has been disclosed to *MINC#NIMC*, and the MINC number which has been generated for them.

MINC#NIMC's Data Integrity Officer is responsible for the overall integrity of the MINC system to ensure that only one MINC is assigned to each individual. The Data Integrity Officer is also responsible for investigating and rectifying possible inaccuracies or anomalies that Prime Users are unable to resolve.

G. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

The information captured by the *MINC#NIMC* database, as well as the MINC number itself, is considered to be confidential personal information, and is handled as such. It is protected by appropriate physical, staffing, process and electronic means. The COACH guidelines and the CSA Model Code form the basis of this protection. Contracts with information managers and Prime and Licensed Users specify appropriate confidentiality and security provisions.

Independent risk assessments of the MINC system are undertaken on a regular basis. Details of *MINC#NIMC's* security safeguards are available on request.

H. Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

This Privacy Code, as may be amended from time to time, is available on the *MINC#NIMC* website at www.minc-nimc.ca.

MINC#NIMC's policies and practices with respect to the management of information in the MINC database are open to stakeholders for inspection on request. Individuals who are issued a MINC number are provided with information about the MINC system at the time of consent, are notified that their core information has been submitted to *MINC#NIMC* and the MINC number has been issued, and are also provided with contact information.

I. Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

MINC#NIMC's policy in this regard is exactly as outlined above. Upon written request, and with documentary proof of identity, individuals will be provided with a copy of all information contained in the MINC database pertaining to them, and logs of access and disclosure of their file. Also available will be the names and contact information for the individual responsible for compliance of any pertinent Prime or Licensed User. A minor administrative fee may be charged for provision of copies.



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J. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

Any individual whose personal information has been included in the MINC#NIMC database is entitled to challenge MINC#NIMC's Executive Director with respect to compliance with any of the above principles. Written complaints will be investigated, resolved, and any appropriate remedial measures undertaken.

Similarly, the individual shall have the right to challenge any Prime or Licensed User who is felt to have not complied with this Code, by way of written complaint to the designated information officer of that organization, and/or the Executive Director of MINC#NIMC.

MINC#NIMC's agreements with Prime Users and Licensed Users all have provision to audit their compliance practices.

Any questions or concerns regarding privacy issues should be brought to the attention of:

MINC#NIMC Corporation
300-699 Howe Street
Vancouver, BC V6C 0B4
Attention: Mr. Michael Epp, Executive Director

Telephone: (604) 733-7758
Email: info@minc-nimc.ca