

EverHome Concierge – Privacy Policy

Effective Date: [Insert Date]

EverHome Concierge ("EverHome," "we," "us," or "our") is committed to respecting and protecting the privacy, dignity, and confidentiality of our clients, prospective clients, families, caregivers, and website visitors. This Privacy Policy explains how EverHome Concierge collects, uses, discloses, stores, and safeguards personal information in accordance with applicable privacy legislation, including the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and applicable Ontario privacy laws.

This Privacy Policy should be read together with EverHome Concierge's:

- General Terms & Conditions of Service
- Client Service Agreement
- All service-specific policies (including Daily Assistance, Home Maintenance & Organisation, Transportation, Errand, Hourly Concierge, Technology Services, and Free Consultation policies)

In the event of any inconsistency, the Client Service Agreement and applicable service-specific policy will prevail.

1. Our Privacy Commitment

EverHome Concierge provides non-medical, non-regulated concierge and lifestyle support services designed to help seniors maintain independence, comfort, and quality of life while aging in place. We recognize that the personal information entrusted to us is sensitive and personal in nature, particularly given the populations we serve.

We are committed to:

- Collecting only the information necessary to deliver and improve our services
 - Using personal information responsibly and transparently
 - Safeguarding personal information against unauthorized access, use, or disclosure
 - Respecting client autonomy, consent, and dignity at all times
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2. Scope of This Policy

This Privacy Policy applies to:

- Clients and prospective clients of EverHome Concierge
- Family members, caregivers, substitute decision-makers, and authorized representatives
- Website visitors to www.everhomeconcierge.com

- All EverHome Concierge employees, contractors, and service providers

This policy governs personal information collected through:

- Consultations and intake processes
 - Service delivery and coordination
 - Communications by phone, email, website forms, or in person
 - Billing, invoicing, and payment processes
 - Quality assurance and feedback activities
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3. Definitions

Personal Information: Any information about an identifiable individual, including but not limited to name, contact details, address, service preferences, billing information, emergency contact details, and other information reasonably required for service delivery.

Client: An individual who has entered into an agreement with EverHome Concierge to receive services, or their authorized representative.

Authorized Representative: A family member, caregiver, or legally authorized individual acting on behalf of a client.

4. Information We Collect

EverHome Concierge may collect the following types of personal information:

4.1 Identification and Contact Information

- Name, address, phone number, and email address
- Emergency contact details
- Authorized representative or caregiver information

4.2 Service-Related Information

- Information shared during consultations and assessments
- Service preferences, schedules, and instructions
- Accessibility considerations and non-medical support needs
- Notes relevant to service coordination and continuity

4.3 Billing and Administrative Information

- Invoicing and payment information

- Service agreements and signed documentation

4.4 Technology and Website Information

- Information submitted through website forms
- General website usage data (e.g., IP address, browser type), collected through standard analytics tools

EverHome Concierge does **not** intentionally collect medical, clinical, or regulated health information and does not provide medical or personal care services.

5. How We Use Personal Information

Personal information is used solely for legitimate business and service-related purposes, including:

- Conducting consultations and intake assessments
- Delivering, coordinating, and managing services
- Communicating with clients, families, and authorized representatives
- Scheduling, billing, and payment processing
- Ensuring safety, quality assurance, and service improvement
- Complying with legal, regulatory, or contractual obligations

Personal information is **not** sold, rented, or used for unrelated marketing purposes.

6. Consent

EverHome Concierge collects, uses, and discloses personal information with the knowledge and consent of the individual or their authorized representative, except where otherwise permitted or required by law.

Consent may be:

- **Express** (written or verbal), such as during consultations or service agreements
- **Implied**, where information is voluntarily provided for the purpose of receiving services

Clients may withdraw consent at any time, subject to legal or contractual restrictions. Withdrawal of consent may limit or prevent EverHome Concierge from providing certain services.

7. Disclosure of Personal Information

EverHome Concierge may disclose personal information only in the following circumstances:

- With the client's consent or at their direction
- To authorized representatives or caregivers involved in service coordination
- To vetted third-party providers where necessary to deliver requested services (e.g., transportation providers), limited to the minimum information required
- When required by law, regulation, court order, or legal obligation
- Where there is a reasonable concern for safety or risk of harm, consistent with legal reporting obligations

EverHome Concierge does not disclose personal information for commercial gain.

8. Confidentiality & Staff Obligations

All EverHome Concierge employees, contractors, and representatives are required to:

- Maintain strict confidentiality of all client information
- Access personal information only as necessary to perform their duties
- Comply with internal privacy, confidentiality, and data protection protocols

Confidentiality obligations continue even after services end.

9. Safeguards and Data Protection

EverHome Concierge employs reasonable administrative, technical, and physical safeguards to protect personal information, including:

- Secure record-keeping practices
- Restricted access to personal information
- Password-protected systems and devices
- Secure handling and storage of physical documents

Despite these measures, no method of transmission or storage can be guaranteed to be completely secure. EverHome Concierge cannot guarantee absolute security but takes reasonable steps to mitigate risks.

10. Technology & Digital Services

Where technology support services are provided:

- Access to devices or accounts occurs only with client consent
- Login credentials are not stored centrally by EverHome Concierge

- Assistance is educational and supportive in nature

Clients remain responsible for account security, device backups, and software updates, as outlined in the Technology Service Policy and General Terms & Conditions.

11. Retention of Personal Information

Personal information is retained only for as long as necessary to:

- Fulfill the purposes for which it was collected
- Meet legal, regulatory, and contractual requirements

When no longer required, information is securely destroyed or anonymized.

12. Access, Accuracy, and Corrections

Clients or their authorized representatives may:

- Request access to their personal information
- Request corrections to inaccurate or incomplete information

Requests must be made in writing and will be addressed within a reasonable timeframe, subject to legal limitations.

13. Complaints and Privacy Concerns

Questions, concerns, or complaints regarding privacy practices may be directed to:

Privacy Officer

EverHome Concierge

info@everhomeconcierge.com

(613) 663-2379

EverHome Concierge will investigate privacy complaints in good faith and take appropriate corrective action where required.

14. Changes to This Privacy Policy

EverHome Concierge reserves the right to update this Privacy Policy periodically to reflect changes in services, legal requirements, or operational practices. The most current version will be made available on our website or upon request.

Continued use of EverHome Concierge services constitutes acceptance of the current Privacy Policy.

15. Governing Law

This Privacy Policy is governed by the laws of the Province of Ontario and applicable federal privacy legislation.