

# New dental practice management software

Example Dental Clinic

Person in charge of the protection of personal information

Isabelle Example, Dentist and owner

Project

New dental practice management software

Project type

Acquisition or development of an information system

Date

September 25, 2026

Version

1

## In-depth

Level of review

## 2

Findings

0 gap, 2 to confirm

## 0

Priority risks

high severity and likelihood

## 0

Vendors outside Québec

## 4

Measures

## 1 Purpose and scope

Example Dental Clinic is replacing its practice management software, currently installed on a server in its office, with cloud software from a Québec publisher, hosted in Québec. The new software will hold patients' records, including medical history, X-rays and treatment plans, as well as the schedule, billing and claims to insurers. Example Dental Clinic is undertaking the project to keep its patients' records, to manage its schedule, billing and insurer claims, and to send patients appointment reminders by text message. The information will not be used for any purpose other than these.

This assessment covers the acquisition of the new software. It includes the migration of existing records by the publisher, the hosting of the information in the cloud, access to it by Example Dental Clinic staff, its retention and return at the end of the contract, and the sending of appointment reminders through a text message service. The records concern between 100 and 10,000 people, many of them children, and consist largely of health information, which makes the information highly sensitive. The assessment is limited to the processing described here and does not cover other activities of Example Dental Clinic. The text message service has not yet been named by the publisher, so the assessment of that part of the project relies on incomplete information.

Under the fourth paragraph of section 3.3 of the LPRPSP, the assessment is proportionate to the sensitivity of the information, the purposes of its use, its quantity, its distribution and the medium on which it is stored. On those factors, this assessment is carried out at a high level of detail.

- LPRPSP: Act respecting the protection of personal information in the private sector (CQLR, c. P-39.1).
- LRSSS: Act respecting health and social services information (CQLR, c. R-22.1).

## 2 Personal information concerned

| Information                             | Nature         | Persons concerned |
|-----------------------------------------|----------------|-------------------|
| Medical history and dental record       | Health         | Patients          |
| X-rays                                  | Health         | Patients          |
| Name, date of birth and contact details | Identification | Patients          |
| Insurance and billing                   | Financial      | Patients          |

| Factor (s. 3.3) | Finding                                                                                                    |
|-----------------|------------------------------------------------------------------------------------------------------------|
| Sensitivity     | high                                                                                                       |
| Purpose         | Keep patients' dental records; Manage the schedule, billing and insurer claims; Send appointment reminders |
| Quantity        | 100 to 10,000 persons                                                                                      |
| Distribution    | Location of at least one processing unknown                                                                |

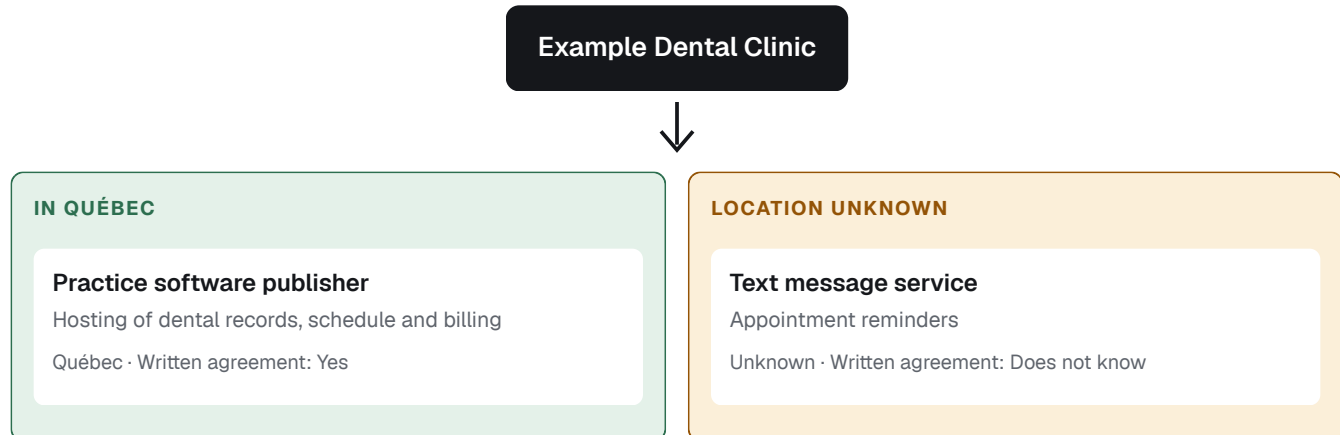
| Factor (s. 3.3) | Finding |
|-----------------|---------|
| Medium          | Cloud   |

### 3 Data flows

The personal information comes from Example Dental Clinic's patients. It includes their name, date of birth and contact details, their medical history and records, their X-rays, and their insurance and billing information. Patients are informed of how their information is handled. When the project begins, the publisher will migrate the existing records, including those of many children, from the office server to the new cloud software. From then on, information collected from patients will be recorded directly in the software.

The publisher hosts the records, the schedule and the billing information, and processes them in Québec under a written agreement with Example Dental Clinic. To send appointment reminders, patients' contact details and appointment information will be passed to a text message service. The publisher has not yet identified this service. Where it processes the information, and whether a written agreement covers that processing, remain to be confirmed. Within Example Dental Clinic, access to the information is limited to staff who need it for their work. No decision about patients is made exclusively by automated processing.

The contract with the publisher sets the retention period for the information and provides for the data to be returned to Example Dental Clinic at the end of the contract. Patients receive appointment reminders by text message. How long the text message service keeps the information it receives remains to be confirmed once that service is identified.



| Processing                                      | Vendor                      | Location | In Québec     | Written agreement |
|-------------------------------------------------|-----------------------------|----------|---------------|-------------------|
| Hosting of dental records, schedule and billing | Practice software publisher | Québec   | Yes           | Yes               |
| Appointment reminders                           | Text message service        | Unknown  | Does not know | Does not know     |

## 4 Findings and risks

### Findings

To confirm

LPRPSP, ss. 17 and 18.3

#### No written agreement with Text message service, outside Québec

Section 17 requires that a communication outside Québec be the subject of a written agreement that takes the results of the assessment into account. Section 18.3 requires that the mandate or contract be in writing and specify the protection measures the vendor must take.

**Answer:** does not know

To confirm

LPRPSP, s. 17

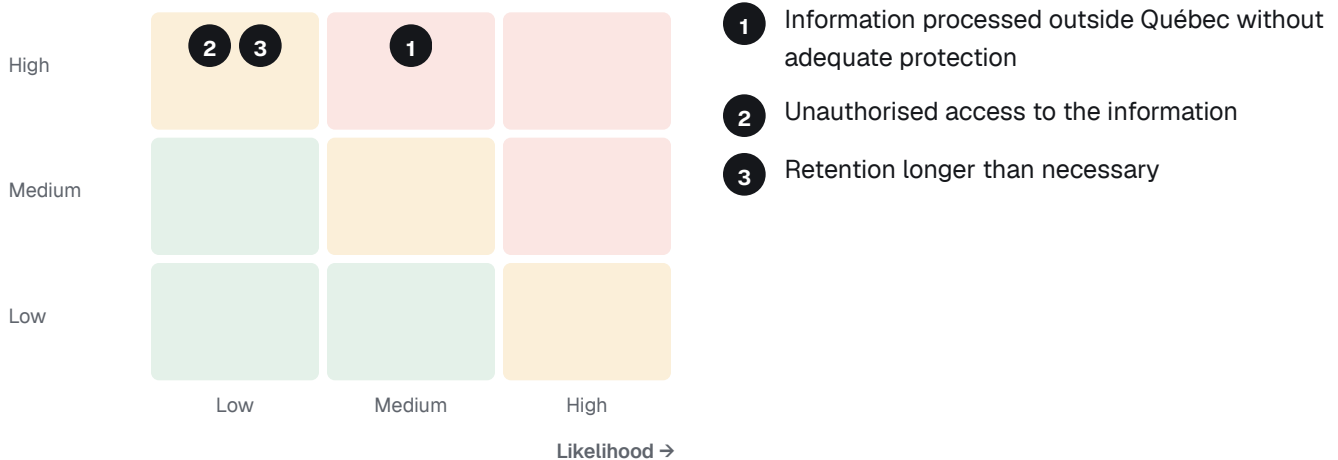
#### Processing location unknown: Text message service

Section 17 requires an assessment before any communication outside Québec. While the processing location is unknown, such a communication cannot be ruled out.

**Answer:** does not know

### Risks

Severity ↑



| # | Risk                                                             | Severity | Likelihood | Sections              |
|---|------------------------------------------------------------------|----------|------------|-----------------------|
| 1 | Information processed outside Québec without adequate protection | high     | medium     | LPRPSP, s. 17         |
| 2 | Unauthorised access to the information                           | high     | low        | LPRPSP, ss. 20 and 10 |

| # | Risk                            | Severity | Likelihood | Sections      |
|---|---------------------------------|----------|------------|---------------|
| 3 | Retention longer than necessary | high     | low        | LPRPSP, s. 23 |

## 5 Communication outside Québec

According to the organisation's answers, no personal information is communicated outside Québec in this project.

## 6 Measures adopted

The measures below follow from the characteristics of the project. For each one, the organisation states whether it is in place or planned, and who is responsible.

|                                                                                                                                                                                                          | In place                 | Planned                  | Responsible |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------|
| Determine the purposes before collecting, and collect only the information necessary for them.<br>LPRPSP, ss. 4 and 5                                                                                    | <input type="checkbox"/> | <input type="checkbox"/> | _____       |
| Take reasonable security measures given the sensitivity, purposes, quantity, distribution and medium of the information.<br>LPRPSP, s. 10                                                                | <input type="checkbox"/> | <input type="checkbox"/> | _____       |
| Obtain the consent of the person having parental authority or the tutor before collecting information from a minor under 14, unless the collection is clearly for the minor's benefit.<br>LPRPSP, s. 4.1 | <input type="checkbox"/> | <input type="checkbox"/> | _____       |
| Set out the procedure for confidentiality incidents, and record each incident in the incident register.<br>LPRPSP, ss. 3.5 and 3.8                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | _____       |

## 7 Conclusion

The assessment produced two findings, both concerning the text message service that will send appointment reminders. The first is that it is not known whether a written agreement governs that service's processing of patients' information. The second is that the place where the service processes the information is unknown. The main risk identified is that information could be processed outside Québec without adequate protection, which is rated high in severity and medium in likelihood. The assessment also identified two risks rated high in severity and low in likelihood: unauthorised access to the information, and retention longer than necessary. The high sensitivity of the health information involved, and the number of children whose records are migrated, add weight to these risks.

The hosting arrangement with the Québec publisher rests on a written agreement that sets the retention period and the return of the data. The text message service is the main point still to be clarified. Its identity, its processing location, the existence and terms of an agreement with it, and how long it keeps the information all remain to be confirmed. Example Dental Clinic adopts the four measures set out in this document to address these findings and risks.

*This document was drafted from the organisation's answers. It applies the cited provisions to those answers and does not constitute legal advice. The organisation adopts it under the responsibility of its person in charge of the protection of personal information.*

### Adoption

**The organisation adopts this assessment and the measures it sets out.**

Name: Isabelle Example

Title: Dentist and owner

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

## Appendix: the organisation's answers

| Question                                            | Answer                                                                                                     |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| Project type                                        | Acquisition or development of an information system                                                        |
| Purposes                                            | Keep patients' dental records; Manage the schedule, billing and insurer claims; Send appointment reminders |
| Use for a new purpose                               | No                                                                                                         |
| Quantity                                            | 100 to 10,000 persons                                                                                      |
| Medium                                              | Cloud                                                                                                      |
| Retention period defined                            | Yes                                                                                                        |
| Access limited to staff who need it                 | Yes                                                                                                        |
| Decision based exclusively on automated processing  | No                                                                                                         |
| Human review of the decision                        | No                                                                                                         |
| Identification, location or profiling technology    | No                                                                                                         |
| Product offered to the public with privacy settings | No                                                                                                         |
| Collection from minors under 14                     | Yes                                                                                                        |
| Persons concerned informed                          | Yes                                                                                                        |
| Communication in a structured format possible       | Yes                                                                                                        |
| Person in charge consulted from the start           | Yes                                                                                                        |