



Jaan Lilles  
416-865-3552  
jlilles@litigate.com



Amanda Smallwood  
416-865-3056  
asmallwood@litigate.com

## PHIPA Decision 240

Counsel to the successful respondent physician in a complaint before the Information and Privacy Commissioner of Ontario, relating to the application of the access provisions of the Personal Health Information Protection Act in a circumstance where the complainant was a relative and not a patient.