

## Privacy Compliance Policy

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**Applies to:** Employees

**Topic Owner:** HR Services

**Last Updated:** January 26, 2021

### OVERVIEW

We all need to understand and follow the legislated rules around collecting, using, and disclosing private information.

### DEFINITIONS

#### *PIPEDA*

Personal Information Privacy and Electronic Document Act (PIPEDA) sets out the ground rules for how organizations collect, use, or disclose personal information in the course of activities across Canada.

### POLICY

Currently, PIPEDA protects personal information in provinces and Territories that do not have their own private sector privacy laws. Currently, only BC, AB and QC have privacy laws. Please see specific information in the Resources section on legislation in those provinces. You are responsible for understanding and adhering to this Policy to ensure that the CCRW is compliant with PIPEDA or your provincial legislation requirements by adhering to its 10 Principles as follows:

#### 1. Accountability

- ◆ CCRW and its Staff will comply with all 10 of the Principles.
- ◆ The COO is the individual responsible for CCRW's compliance.
- ◆ Personal information held by CCRW or transferred to a third party for processing will be protected.

#### 2. Identify Purpose for Collection

We will identify the reasons for collecting personal information before or at the time of collection.

- ◆ Before or when any personal information is collected, we will identify why it is needed and how it will be used.
- ◆ We will document why the information is collected.
- ◆ We will inform the individual from whom the information is collected why it is needed.

- ◆ If we identify any new purpose for the information, we will obtain the individual's consent before using it.

### **3. Obtain Informed Consent**

Consent is considered valid only if it is reasonable to expect that individuals to whom CCRW's activities are directed would understand the nature, purpose, and consequences of the collection, use or disclosure to which they are consenting.

We may collect personal information without an individual's knowledge or consent only as outlined as specific exceptions under PIPEDA.

- ◆ We will specify what personal information we are collecting and why in a way that our customers can clearly understand.
- ◆ We will inform the individual in a meaningful way of the purposes for the collection, use or disclosure of personal data.
- ◆ We will obtain the individual's consent before or at the time of collection, as well as when a new use of their personal information is identified.

### **4. Limit Collection of Personal Information**

- ◆ We will not collect personal information indiscriminately.
- ◆ We will not deceive or mislead individuals about the reasons for collecting personal information.

### **5. Limit Use, Disclosure, & Retention**

- ◆ We will use or disclose personal information only for the purpose for which it was collected unless the individual consents or the use or disclosure is authorized by PIPEDA.
- ◆ We will keep personal information only as long as necessary to satisfy the purposes.
- ◆ We have guidelines and procedures in place for retaining and destroying personal information. They can be found in **Management of Records**.
- ◆ We will keep personal information used to decide on a person for a reasonable period of time.
- ◆ We will destroy, erase, or render anonymous any personal information that is no longer required for an identified purpose or a legal requirement.

### **6. Keep Personal Information Accurate**

- ◆ We will make every effort to minimize the possibility of using incorrect information when deciding on the individual or when disclosing information to third parties.

### **7. Safeguard Personal Information**

- ◆ We will protect personal information against loss or theft.

- ◆ We will safeguard the information from unauthorized access, disclosure, copying, use or modification.
- ◆ We will protect personal information regardless of the format in which it is held.

## **8. Make Information About Policies & Procedures Available**

- ◆ Everyone has access to our privacy practices on our website. Printed and accessible copies are available upon request.

## **9. Provide Access to Personal Information**

With some specific exceptions outlined in PIPEDA, individuals have access to the private information CCRW has about them.

- ◆ When requested, we will inform individuals if we have any personal information about them.
- ◆ We will explain how it is or has been used and provide a list of any organizations to which it has been disclosed.
- ◆ We will give individuals access to their information.
- ◆ We will correct or amend any personal information if its accuracy and completeness are challenged and found to be deficient.
- ◆ We will provide a copy of the information requested, or reasons for not providing access, subject to exceptions set out in Section 9 of PIPEDA.
- ◆ We will note any disagreement on the file and advise third parties where appropriate.

## **10. Provide Recourse**

- ◆ Our complaint procedure is available on our website and includes information about available recourse.
- ◆ We will promptly investigate all complaints received.
- ◆ We will take appropriate and reasonable measures to correct information handling practices.

## **RESOURCES**

CCRW intends that this Policy is compliant with provincial legislation.

Alberta

- ◆ <https://www.alberta.ca/personal-information-for-non-profits-and-other-organizations.aspx>

British Columbia

- ◆ <https://www.oipc.bc.ca/for-private-organizations/>

Quebec

- ♦ <https://www.cai.gouv.qc.ca/diffusion-de-linformation/>

Rest of Canada

- ♦ <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>
- ♦ <https://laws-lois.justice.gc.ca/eng/acts/P-8.6/FullText.html>