

[Name of Organization]

Privacy Protection Policy

[Name of Organization] is committed to protecting the privacy of its employees, directors, officers, volunteers, and any other persons from whom [Name of Organization] collects personal information.

We manage all personal information in our custody or under our control in accordance with universal Fair Information Principles, as set out in the Canadian Standards Association (CSA) Model Privacy Code and the Personal Information Protection and Electronic Documents Act (PIPEDA).

Personal information collected by [Name of Organization] will be limited to the information that is needed for providing services to our clients and will be used only for the purposes for which it is collected. Personal information will be disposed of in a safe and timely manner when no longer required.

[Name of Organization] is committed to safeguarding the personal information entrusted to us by our clients and our employees. No personal information will be sold, rented, leased or otherwise made available to any person without the explicit consent of the person from whom it was collected.

[Name of Organization] has designated the Executive Director to be its Privacy Officer. Any inquiry, request or concern related to privacy matters should be made in writing to the Executive Director at the address of [Name of Organization].

[Name of Organization] has adopted the following 10 Privacy Principles:

1. Accountability

[Name of Organization] accepts responsibility for maintaining and protecting the personal information in its custody or under its control. [Name of Organization] has appointed the Executive Director as the Privacy Officer, who will ensure there is compliance with all of these Privacy Principles.

2. Identifying Purposes

[Name of Organization] collects and uses personal information for a variety of purposes including, but not limited to:

(Here list the primary functions or programs of the organization)

[Name of Organization] shall identify and explain the purposes for which it collects personal information, to the person from whom the personal information is being collected, before or at the time the information is collected. [Name of Organization] is committed to collecting personal information in a fair, open and lawful manner.

3. Consent

Consent will be obtained from the person whose personal information is collected, used and disclosed, unless obtaining the express consent would be inappropriate or not required by these Principles. Sometimes the person's consent may be implied by virtue of their involvement with [Name of Organization]. However, the primary method of obtaining consent will be expressed consent in writing.

Written consents will be kept on file for as long as the information is reasonably necessary. A person may withdraw his or her consent at any time, subject to legal or contractual restrictions and reasonable notice. The person will be informed of reasonably foreseeable implications of the withdrawal.

4. Limiting Collection

Information collected will be limited to that required for the purpose for which it was collected.

5. Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, unless explicit consent is obtained to use it for another purpose, or if required by law. All collected personal information shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by the law.

6. Accuracy

Personal information shall be maintained in as accurate, complete and up-to-date a form as necessary in order to fulfill the purposes for which it was collected. Periodic reviews of personal information, particularly in informational databases – including email address books - will be conducted to verify the accuracy of the information.

7. Safeguards

Personal information will be protected by security safeguards that are appropriate to the sensitivity of the personal information. This safeguarding shall include physical measures such as locked filing cabinets and premises security, organizational measures such as restricted access to files with personal information, and/or technological measures such as security software.

8. Openness

Information regarding the privacy policy of [Name of Organization], as well as the personal information management program, shall be available on request.

The information will include:

- Name and address of the Privacy Officer;
- A copy of this Privacy Policy
- Means of gaining access to one's own personal information held by [Name of Organization]; and
- Copies of any brochures or other information that explains [Name of Organization]'s policies, standards or codes for protecting personal privacy.

9. Access to Records containing Personal Information

Access to one's own personal information in the custody or under the control of [Name of Organization] will be granted, subject to some exceptions. For example, access to the personal information of third parties will be denied unless the request is accompanied by the written consent of the third party. For added protection, such written consent will be verified by the Privacy Officer.

If we refuse a request in whole or in part, we will provide the reasons for the refusal.

In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to the Privacy Officer at the address of [Name of Organization]. You must provide sufficient information in your request to allow us to identify the information you seek.

You may also request information about how your personal information has been used by [Name of Organization] and any disclosure of that information to persons outside our organization.

You may also request a correction of an error or omission in your personal information. The Privacy Officer has the responsibility to decide whether it is appropriate to correct the information in the record. If the Privacy Officer decides not to correct the information, you will be given the reasons for the decision and the Privacy Officer will annotate the record with the correction that was requested but not made.

[Name of Organization] will respond to your request within 30 calendar days of receiving the request. If the search for the information and preparing the records for disclosure involves an inordinate amount of time and copying expenses, the Privacy Officer will advise you of any fees that may apply before processing your request.

10. Challenging Compliance

Complaints or inquiries about the collection, use, disclosure or retention of personal information and [Name of Organization]'s compliance with these ten principles should be directed to the Privacy Officer. The Privacy Officer will investigate complaints and take appropriate correction measures where a complaint is substantiated. The Privacy Officer may use whatever form of dispute resolution available, including mediation, in an effort to settle the complaint. The Privacy Officer will advise you in writing how the complaint has been dealt with and what measures were taken or are proposed to correct an error and prevent a recurrence.

If you are not satisfied with the results of the Privacy Officer's actions and decision, you may make a request in writing to the address of [Name of Organization] for a review by the Board of Directors. The Board will review the complaint, the action taken by the Privacy Officer, and any additional relevant information, and conclude the matter in any of the following ways:

- confirm and validate the actions and decision taken by the Privacy Officer;
- direct the Privacy Officer to reconsider the complaint on the basis of specific grounds not previously taken into account;
- vary the decision of the Privacy Officer; or
- direct the Privacy Officer to take further action or make changes to administrative processes or procedures as appropriate.

The Board of Directors will complete a report on the results of its review, with reasons for its decision, and provide a copy to the person making the complaint and to the Privacy Officer.

Investigations by the Privacy Officer on a complaint, and any subsequent review by the Board of Directors will be in a conducted in a timely manner.