



SECTION: Administration

REVISED: Feb. 2017

TOPIC: PRIVACY POLICY

NUMBER: A-P01

Policy:

CCRC is committed to protecting the privacy of our donors, members, clients, staff and volunteers and maintaining the confidentiality of their personal information.

CCRC will maintain a written statement of its commitment to privacy on its website, including a description of its practices to protect privacy and personal information, an outline of circumstances when such information may be disclosed, contact information for its Privacy Officer and procedures for making a complaint regarding a breach of privacy.

CCRC will appoint the Manager of Finance and Administration as CCRC's Privacy Officer. The Privacy Officer is responsible for ensuring that the Privacy Legislation is complied with through the ongoing review of our information systems and procedures.

Procedures:

Ten Principles of *PIPEDA* Summarized

This privacy policy has been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*"). *PIPEDA* sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act:

The ten principles of *PIPEDA* that form the basis of this Privacy Policy are as follows:

1. **Accountability:** organizations are accountable for the personal information they collect, use, retain and disclose in the course of their commercial activities, including, but not limited to, the appointment of a Chief Privacy Officer;
2. **Identifying Purposes:** organizations are to explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;



3. **Consent:** organizations must obtain an Individual's express or implied consent when they collect, use, or disclose the individual's personal information. "*Express consent*" means the individual signs the application, or other forms containing personal information, authorizing the organization to collect, use, and disclose the individual's personal information for the purposes set out in the application and/or forms. "*Implied Consent*" means the organization may assume that the individual consents to the information being used, retained and disclosed for the original purposes, unless notified by the individual.
4. **Limiting Collection:** the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;
5. **Limiting Use, Disclosure and Retention:** personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the Individual consents to the alternative use or disclosure;
6. **Accuracy:** organizations are required to keep personal information in active files accurate and up-to-date;
7. **Safeguards:** organizations are to use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.
8. **Openness:** organizations must inform their clients and train their employees about their privacy policies and procedures;
9. **Individual Access:** an individual has a right to access personal information held by an organization and to challenge its accuracy if need be; and
10. **Provide Recourse:** organizations are to inform clients and employees of how to bring a request for access, or a complaint, to the Chief Privacy Officer, and are to respond promptly to a request or complaint by the individual.

CCRC-Specific Procedures:

The collection, use and release of personal information by CCRC will comply with provincial and federal legislation, including that CCRC will:

1. Obtain the informed consent of persons served for the collection, use and release of their personal information, except where permitted or required by law



2. Advise persons providing such information how it will be used (for example, for routine management, professional supervision and quality assurance purposes, including accreditation)
3. Obtain the consent of a substitute decision maker, if needed
4. Advise people of their rights related to withdrawal of consent, withholding of consent or limits placed on use of the personal information, including informing persons served of implications for service (for example, limits to treatment, loss of third-party benefits)
5. Limit the use of personal information to the purposes for which the information was provided and prevent unauthorized access to personal information held by the organization.
6. Respond to police and other third-party requests for personal information as required by law
7. Notify persons served in the case of theft, loss, or unauthorized use or release of their personal information
8. Permit persons served to access their personal information, to request a correction, and to request a copy of their personal information in accordance with CCRC Program Policy Client Rights, P-C01
9. Provide procedures for complaints regarding a breach of privacy in accordance with CCRC Program Policy Client Complaints and Appeals, P-C06
10. CCRC will issue a statement on its commitment to privacy of personal information on its fundraising pledge forms, with a link to its statement on its website.
11. CCRC will not provide, release or share personal information with third parties unless:
 - a. The person(s) authorize(s) us in writing (signed and dated) to share the information



- b. Sharing the information is necessary to process a donation, for example to process a credit card transaction;
- c. It is required by law.

CCRC will provide a statement on its commitment to privacy of personal information on its fundraising pledge forms, with a link to its statement on its website.