

## Canadian Association of Counsel to Employers

### Privacy Statement

The Canadian Association of Counsel to Employers, (CACE), is committed to safeguarding the personal information entrusted to us by our members. We manage your personal information in accordance with the *Personal Information Protection and Electronic Documents Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

#### What is personal information?

Personal information means information about an identifiable individual. This may include an individual's name, address and phone number, an identifying number, financial information, biographical information, etc.

#### What personal information do we collect?

We collect a limited amount of personal information, and only the personal information that we need for the purposes of providing services to our members, including personal information needed to:

- send out CACE membership information
- notify members of upcoming events of interest
- register members for conferences
- create conference speaker biographies
- provide materials to our members

We collect client information directly from our members.

We inform our members, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a member volunteers information for an obvious purpose (ie: a credit card to register for a conference when the information will be used only to process the payment).

#### Consent

We ask for consent to collect, use or disclose member personal information, and we will not disclose personal information to any third party without it. We may assume your consent in cases where you volunteer information for an obvious purpose.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask members to provide their consent orally (in person, or by telephone), in writing (by signing a consent form), or electronically (by clicking a button).

#### How do we use and disclose personal information?

We use and disclose client personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use member contact information to deliver goods. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

### How do we safeguard personal information?

We make every reasonable effort to ensure that member information is accurate and complete. We rely on our members to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible.

In some cases we may ask for a written request for correction.

We protect member personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying member personal information, including shredding paper records and permanently deleting electronic records.

We retain member personal information only as long as is reasonable to fulfil the purposes for which the information was collected, or for legal or business purposes.

### Access to records containing personal information

CACE members have a right of access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, we are required to refuse to provide access to information that would reveal personal information about another individual.

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 e-mail to the President of CACE. Their contact information can be found on CACE's internet home page. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information 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.

A model policy would list some examples of physical, technological and administrative measures used to protect personal information, such as IT network security and restrictions based on the "need to know" on employee access to personal information.

Remember you will be held to what you say in your policy, so your policy must reflect your actual practices.

The complete list of exceptions to access appears in section 24 of PIPA (*Guide*, pp.41-2). Choose examples that are relevant to your organization.

PIPA requires every organization to designate an individual to be responsible for compliance with the Act.

An organization that receives a lot of requests may find it helpful to develop a schedule of fees.

## **Questions and complaints**

If you have a question or concern about any collection, use or disclosure of personal information by CACE, or about a request for access to your own personal information, please contact the President of CACE by e-mail.