

The Council of Canadians Privacy Policy

The Council of Canadians (The Council) is committed to the protection of the personal information of its donors, members, volunteers, as well as its prospective and current employees.

The Council is a national organization and, as such, it is committed to meeting its obligations under the various applicable privacy laws across Canada such as Alberta's *Personal Information Protection Act*, British Columbia's *Personal Information Protection Act*, and Quebec's *Act Respecting the Protection of Personal Information in the Private Sector*. In other provinces across the country, The Council meets its obligations under the *Personal Information Protection and Electronic Documents Act* ("PIPEDA") when it is involved in the collection, use and disclosure of personal information for commercial purposes.

Personal Information is factual or subjective information, recorded or not. It can include, but is not limited to, age, name, addresses, e-mail addresses, donation history, financial information, identification numbers, income, ethnic origin, or opinions.

During the course of our normal activities The Council frequently gathers and uses personal information from donors, members, volunteers, prospective employees and current employees and others who are involved or interested in our work. This may include name, home address, home telephone number and e-mail address, financial information and information normally required for employment or donation purposes. Information may be in verbal, print or electronic form.

This policy is applied to all personal information collected, used or disclosed--whether factual or subjective--about an identifiable individual during the course of commercial activities. The Council will ensure that individuals, groups, organizations and/or businesses that have been approved, designated or contracted to act for or on its behalf are aware of and in compliance with the principles set forth in this Policy.

The Council adheres to the following privacy principles:

Accountability: The Director, Human Resources and Administration is responsible for ensuring compliance with this policy. The Director may, from time to time, delegate another individual in the agency to act on his/her behalf. The Director, Human Resources and Administration can be contacted at privacy@canadians.org.

Identifying Purposes: The purposes for which the Council collects, uses and discloses personal information will be identified at or before the time the information is collected. In general, the Council collects, uses and discloses personal information for a variety of reasons including:

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- To verify the identity of Council members;
- To promote up-coming activist-related events and opportunities;
- To register members and non-members for Council events;
- To promote our programs and services to prospective members; or
- To solicit funds to support our activities.

Consent: The knowledge and consent of the individual are obtained for the collection, use, or disclosure of personal information, at the time of collection. **Consent** can be either express or implied. Express consent is given explicitly, either orally or in writing. Implied consent occurs where consent may reasonably be inferred from the action or inaction of the individual.

Limiting Collection: Collection of personal information is limited to that which is necessary for the purposes identified above and/or for the purposes identified at the time of collection.

Limiting use, disclosure and retention: Personal information will be used or disclosed only for the purposes for which it was collected except with the consent of the individual or as required by law. Personal information is retained only as long as necessary to fulfill these purposes. Once personal information is no longer required to fulfill the identified purposes or to comply with legal requirements regarding retention, it will be destroyed or rendered anonymous.

Accuracy: Personal information will be kept as accurate, complete and up-to-date as necessary for the purposes for which it is used.

Safeguards: Personal information is protected by security safeguards appropriate to the sensitivity of the information such as internet security, password protection on electronic files, locked filing cabinets and locked storage rooms.

Openness: Information about our policies and practices relating to the management of personal information is available on request to privacy@canadians.org.

Individual Access: Upon request, an individual will be provided with information about the existence, use, and disclosure of his or her personal information and will be given access to that information. Requests for access to personal information must be made in writing to the Director, Human Resources and Administration. The Council then has 30 days in which to respond to the request or in which to provide the individual with the legal basis for which the request is denied.

The individual may challenge the accuracy and completeness of their personal information and have it amended as appropriate.

Challenging Compliance: If an individual has concerns over the Council's compliance with this Policy, he or she should address their concern in writing to:

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Privacy Officer
The Council of Canadians
700 – 170 Laurier Avenue West
Ottawa, Ontario K1P 5V5
e-mail: privacy@canadians.org

An individual also has the right to contact the appropriate Privacy Commissioner within their own jurisdiction. In jurisdictions where PIPEDA applies and in circumstances where an individual has a concern about The Council's compliance with this policy with respect to the collection, use or disclosure of personal information for commercial purposes, an individual can contact the Office of the Privacy Commissioner of Canada at:

112 Kent Street
Place de Ville
Tower B, 3rd Floor
Ottawa, Ontario
K1A 1H3

Toll-free: 1-800-282-1376
Phone: (613) 995-8210
Fax: (613) 947-6850
TTY: (613) 992-9190