



<b>EFFECTIVE DATE:</b> September 1, 2013	<b>POLICY:</b> Personal Information Protection Act ( <i>PIPA</i> )
<b>REVISED DATE:</b>	<b>APPROVED BY:</b> Board of Directors

## **INTENT**

At CUI, we are committed to providing our clients and employees with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients and employees, protecting their personal information is one of our highest priorities.

While we have always respected our clients and employees privacy and safe-guarded their personal information, we have strengthened our commitment to protecting personal information as a result of Alberta's *Personal Information Protection Act (PIPA)*. *PIPA, A.R. 366/2003*, which sets out the ground rules for how Alberta businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients and employees of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that is reasonable and appropriate.

This Policy, in compliance with *PIPA*, outlines the principles and practices we will follow in protecting members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients and employee's personal information and allowing our clients and employees to request access to it, and correction of, their personal information.

## **SCOPE**

This Policy applies to CUI and all of its subsidiaries throughout the Province of Alberta (as applicable).

This Policy also applies to any service providers collecting, using or disclosing personal information on behalf of CUI.

## **DEFINITIONS:**

**Personal Information** – Information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g. gender, age, income, home address, home phone number, ethnic background, family status, etc.), their health (e.g. health history, health conditions, health services received, etc.), or their activities and view (e.g. religion, politics, opinions expressed by the individual, etc.). Personal information, however, does not include contact information.



**Contact Information** – Information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this Policy or *PIPA*.

**Privacy Officer** – The individual designated responsibility for ensuring that CUI complies with this policy and *PIPA* is the President & COO.

## **COLLECTING PERSONAL INFORMATION**

Unless the purposes for collecting personal information are obvious and the client or employee voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

We will only collect client and employee information that is necessary to fulfill the following purposes:

### **Clients:**

- Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of communicating and reporting about CUI's services, programs, events and activities.
- Information required for enabling utility services payments.

### **Employees:**

- Banking information, social insurance number, criminal records check, resume, and beneficiaries for the CUI payroll, company insurance and health plan.
- Criminal records check and related personal reference information for the purpose of implementing the volunteer screening program.
- Contact information for use in the event of medical emergency.
- Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.

## **CONSENT**

CUI will obtain consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

Consent can be provided by orally, in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the client or employee voluntarily provides personal information for that purpose.



Consent may also be implied where a client or employee is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, marketing, or fundraising, and the client or employee does not opt-out.

Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients or employees can withhold or withdraw their consent for CUI to use their personal information in certain ways. A decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist them in making the decision.

We may collect, use or disclose personal information without the clients or employee's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law.

### **USING AND DISCLOSING PERSONAL INFORMATION**

We will only use or disclose member personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:

- To conduct surveys in order to enhance the provision of our services;
- To contact our clients or employees directly about services that may be of interest.

We will not use or disclose personal information for any additional purpose unless we obtain consent to do so.

We will not sell client or employee lists or personal information to other parties.



## **RETAINING PERSONAL INFORMATION**

If we use client or employee personal information to make a decision that directly affects them, we will retain that personal information for at least one year so that the client or employee has a reasonable opportunity to request access to it.

CUI will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

## **ENSURING ACCURACY OF PERSONAL INFORMATION**

CUI will make reasonable efforts to ensure that client or employee personal information is accurate and complete where it may be used to make a decision about them or disclosed to another organization.

Clients or employees may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

A request to correct personal information should be forwarded to the Privacy Officer.

If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the clients' or employees' correction request in the file.

## **SECURING PERSONAL INFORMATION**

We are committed to ensuring the security of client or employee personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

The following security measures will be followed to ensure that client or employee personal information is appropriately protected:

Methods of protection and safeguards include, but are not limited to:

- Locked filing cabinets.
- Restricted access to offices.
- Security clearances.
- Need-to-know access and technological measures including the use of passwords, encryption and firewalls.

The following steps will be taken to ensure security:



- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
- Electronic information is transmitted either through a direct line or is encrypted.
- Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
- External consultants and agencies with access to personal information will provide CUI with appropriate privacy assurances.

CUI will use appropriate security measures when destroying personal information such as shredding documents, and deleting electronically stored information.

CUI will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

### **PROVIDING ACCESS TO PERSONAL INFORMATION**

Clients or employees have a right to access their personal information, subject to limited exceptions.

A full listing of the exceptions to access can be found in *Section 23 of PIPA*. Some examples include: solicitor-client privilege, disclosure would reveal personal information about another individual, health and safety concerns.

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.

Upon request, we will also tell clients or employees how we use their personal information and to whom it has been disclosed if applicable.

We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client or employee of the cost and request further direction from the client or employee on whether or not we should proceed with the request.

If a request is refused in full or in part, we will notify the client or employee in writing, providing the reasons for refusal and the recourse available to the member.



## **QUESTIONS AND COMPLAINTS**

The Privacy Officer is responsible for ensuring CUI compliance with this policy and the *Personal Information Protection Act*.

Members should direct any complaints, concerns or questions regarding CUI compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of Alberta.