



POLICY MANUAL

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Policy Statement:

CADS - Alberta considers issues relating to member privacy to be a serious matter. This policy has been developed to clearly outline what CADS-Alberta may and may not do with personal information obtained.

2.5.1 Introduction

CADS-Alberta is committed to safeguarding the personal information entrusted to us by our members. We manage your personal information in accordance with Alberta's *Personal Information Protection Act* and other applicable laws.

This policy outlines the principles and practices we follow in protecting your personal information.

2.5.2 Collection of Personal Information

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, medical records, an identifying number, financial information, educational history, etc.

Membership with CADS-Alberta requires that each member provides certain personal information. This personal information is needed for the purposes of providing our services.

We normally collect personal information directly from our members. We may collect your information from other persons with your consent or as authorized by law.

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 (for example, producing a credit card to pay a membership fee when the information will be used only to process the payment).

2.5.3 Consent

We ask for consent to collect, use or disclose member personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

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 (by telephone or in person) or in writing (by signing a consent form).

In cases that do not involve sensitive personal information, we may rely on "opt-out" consent. For example, we may disclose your contact information to other organizations that we believe may be of interest to you, unless you request that we do not disclose your information. You can do this by contacting the Executive Coordinator at CADS Alberta.

A member may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose a member's personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health or safety.

2.5.4 How Do We Use and Disclose Personal Information?

We use and disclose member personal information only for the purpose for which the information was collected, except as authorized by law. For example, we may use member contact information:

1. To analyze personal information and other data in order to enhance CADS-Alberta programs, services and website;
2. For the purpose for which it was provided and in relation to activities which are reasonably ancillary to such purpose. For example, with email correspondence to CADS-Alberta, email address and contents can be recorded for future reference, or when an individual attends CADS Alberta functions, CADS Alberta may keep a record of attendance;
3. Postal or email addresses provided to CADS-Alberta will be used to provide information on future CADS-Alberta programs and other items that CADS-Alberta believes important to its members;

4. With a "user id", CADS-Alberta may collect information about member use of the features and services of its website (whether or not the individual provides his/her user id on each visit) and CADS-Alberta may associate this information with other personal information of a member. If a visitor does not have a user id but does permit cookies, then CADS-Alberta has the means to track use of its website by that visitor but has no ability to determine who that visitor is unless the visitor provides that information.
5. CADS-Alberta may also use and disclose personal information that is relevant to a legal proceeding or as permitted or required by law. In the event CADS-Alberta transfers control of any or all of its operations or services, CADS-Alberta reserves the right to transfer and disclose personal information to that party. However, CADS-Alberta will require that party to agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose personal information as set out by this Privacy Policy
6. CADS-Alberta may engage certain service providers to assist CADS-Alberta in its activities. Further, CADS-Alberta may work with other organizations similar to CADS-Alberta towards some common purpose consistent with the objectives of CADS-Alberta. For these purposes, it may be necessary for CADS-Alberta to disclose personal information to these service providers and other organizations. However, CADS-Alberta will require that these service providers and other organizations agree that they will only use and disclose your personal information solely for those purposes and that they will adhere to the terms of this Privacy Policy.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. We may not seek consent if the law allows this (e.g. the law allows organizations to use personal information without consent for the purpose of collecting a debt).

2.5.5 What Is Personal Employee Information?

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, etc.

We can collect, use and disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.

2.5.6 What Personal Employee Information do we collect, use and disclose?

We collect, use and disclose personal employee information to meet the following purposes:

- Determining eligibility for employment or volunteer work, including verifying qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues if they arise
- Administering pay and benefits (paid employees only)
- Processing employee work-related claims (e.g. benefits, insurance claims)
- Complying with requirements of funding bodies (e.g. lottery grants)

- Complying with applicable laws (e.g. Canada Income Tax Act, Alberta Employment Standards Act)

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes.

- Contact information such as your name, home address, telephone number
- Employment or volunteer information such as your resume (including educational background, work history or references), interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
- Benefit information such as forms relating to applications or changes to health and insurance benefits including medical & dental care, life insurance, short and long term disability, etc.
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only)
- Other personal information required for the purposes of our employment or volunteer relationship
- Criminal background checks

We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

We will obtain your consent to collect, use and disclose your personal information for purposes unrelated to the employment or volunteer relationship (e.g. to inform you of a workplace charity program).

2.5.7 What information do we provide for Employee/Volunteer References

In some cases, after your employment or volunteer relationship with us ends, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees and volunteers to other organizations who request references without consent. The personal information we normally provide in a reference includes:

- Confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering
- General information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship

2.5.8 How Do We Safeguard Personal Information?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals 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 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 personal information, including shredding paper records and permanently deleting electronic records.

The CADS-Alberta website has security measures in place to protect against the loss, misuse or alteration of the personal information under CADS-Alberta control. However, CADS-Alberta cannot guarantee that these security measures will not be breached.

We retain personal information for the duration of time the individual is involved with CADS-Alberta, and as long as the information remains relevant and useful to the business and legal functioning of CADS-Alberta. At the conclusion of such time, CADS-Alberta will permanently delete electronic records and shred paper records.

2.5.9 Access to Records Containing Personal Information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of CADS Alberta, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act 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 writing to the Executive Coordinator at CADS Alberta. 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. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

2.5.10 Questions and Complaints

If you have a question or concern about any collection, use or disclosure of personal information by CADS Alberta, or about a request for access to your own personal information, please contact the Executive Coordinator at CADS Alberta.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2

Phone: 403-297-2728

Toll Free: 1-888-878-4044

Email: generalinfo@oipc.ab.ca

Website: www.oipc.ab.ca