



## Privacy Policy

### Purpose

Habitat for Humanity Niagara (HFHN) is committed to protecting the privacy, confidentiality and security of the personal information that it holds by adhering to the obligations set out in the *Personal Information Protection and Electronic Documents Act (PIPEDA)* with respect to the management of personal information. HFHN is equally committed to ensuring that all employees and volunteers of HFHN uphold these obligations.

Violations of this Policy through intent or neglect may result in disciplinary action up to and including termination of employment or association with HFHN. Where appropriate, legal sanctions may also be pursued.

### Scope

This policy applies to the activities of HFHN in managing personal information that it collects during the course of its activities under PIPEDA and during the course of its regular administrative activities.

### Definitions

#### Legislative Requirements

The *Personal Information Protection and Electronic Documents Act (PIPEDA)* is a Canadian law relating to data privacy. It governs how private-sector organizations collect, use and disclose personal information in the course of commercial business. PIPEDA became law on April 13, 2000.

### Policy

HFHN is responsible for the personal information that it collects as a result of its activities and which it subsequently retains, uses, discloses, and destroys. HFHN will continue to develop and implement policies and practices to ensure that personal information is handled in strict accordance with PIPEDA and other relevant legislation and regulations.

HFHN's Privacy Officer is designated as responsible for overseeing the implementation of this policy to ensure compliance, including:

- Ensuring open, full and timely communication to employees and individuals about HFHN's policies, practices and expectations with respect to the handling of personal information;

- The establishment of standards for classifying the sensitivity of personal information, to determine the appropriate level of security required for the information;
- Ensuring that personal information is safeguarded from improper access, loss, use, disclosure or destruction through;
  - The implementation of systems to ensure that only HFHN employees or volunteers whose HFHN responsibilities require access to personal information , are granted access to that information,
  - The inclusion of specific confidentiality provisions in contracts or other arrangements with third parties, which require adherence to the PIPEDA as well as to this policy and internal procedures;
- Ensuring procedures are in place under which individuals may request access to their personal information, request correction of their personal information, and file complaints concerning the management of their personal information;
- Ensuring procedures are in place under which individuals are notified of an improper collection, retention, use, disclosure or destruction of their personal information; and
- Monitoring the degree of compliance with this Policy annually and, where required, initiating action to correct any deficiencies.

## **Collection of Personal Information**

HFHN collects personal information from individuals for various purposes. HFHN may also collect personal information for administrative reasons, e.g. to provide individuals with publications or other requested information.

HFHN commits to collecting only personal information which is directly related to an operating program or activity of HFHN. Wherever possible, such information will be collected directly from the individual about whom it pertains. The amount and the type of the information collected will be limited to that necessary to fulfill identified purpose(s).

HFHN employees or volunteers collecting personal information on behalf of HFHN will be required to be able to explain to individuals the purpose(s) for which the information is being collected or – if unable to do so – will be required to refer the individual to a designated person within HFHN who is able to explain the purpose(s).

## **Consent**

HFHN is committed to seeking the consent of individuals prior to the collection of their personal information. The form of consent may vary depending on the circumstances and the type of information being sought. Consent can be express or implied and can be provided directly by the individual or by an authorized representative. Express consent of individuals is preferable and will be sought whenever possible. Express consent can be given orally, electronically or in writing. Implied consent may be reasonably inferred from an individual's action or inaction (i.e. providing a name and address in order to receive a publication, providing a name and telephone number in order to obtain a response to a question). When determining the appropriate form of consent, HFHN will take into account

the sensitivity of the personal information at issue, the purposes for which it is collected, and the reasonable expectations of the individual.

### **Retention/Destruction of Personal Information**

HFHN is responsible for ensuring that all personal information is managed within an established life cycle. Personal information used by HFHN to make a decision about an individual shall be retained for at least two years after the decision was made. This allows the individual to exercise legal recourse and ensures that the individual has the opportunity to exercise all of the rights afforded him/he under the PIPEDA.

### **Change & Review History**

<b>Date</b>	<b>Modification</b>	<b>Approved by</b>
03/17	Reformatted document	Senior Management
03/17	Policy Review	Senior Management

### **Attachment(s)**