



Canadian Friends Service Committee (Quakers)

Personal Information Policy (2012)

Commitment to Privacy

The Canadian Friends Service Committee (Quakers) is committed to protecting the privacy, confidentiality, accuracy, and security of personal information that is collected, used, retained, and disclosed in compliance with applicable federal and provincial privacy legislation. This includes, but is not limited to, the federal Personal Information Protection and Electronic Documents Act (PIPEDA) (2000, c.5). For more detailed information, please refer to the following: <http://laws.justice.gc.ca/en/P-8.6/index.html>

Privacy legislation, including the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and provincial and territorial legislation, establishes rules for the collection, use and disclosure of "personal information." It addresses two issues:

- the way that Canadian Friends Service Committee collects, uses, discloses, and protects personal information; and
- the right of individuals to access personal information about themselves.

The 10 Principles

Canadian Friends Service Committee will follow the [10 principles](#) for handling personal information as set out in Schedule 1 of the Personal Information Protection and Electronics Document Act of Canada (PIPEDA). These principles are:

1. *Accountability*: organizations are accountable for the personal information they collect, use, retain and disclose in the course of their commercial activities, including, but not limited to, the appointment of a Chief Privacy Officer;
2. *Identifying Purposes*: organizations are to explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;
3. *Consent*: organizations must obtain an Individual's express or implied consent when they collect, use, or disclose the individual's personal information;
4. *Limiting Collection*: the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;
5. *Limiting Use, Disclosure and Retention*: personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the Individual consents to the alternative use or disclosure;
6. *Accuracy*: organizations are required to keep personal information in active files accurate and up-to-date;

7. *Safeguards*: organizations are to use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.
8. *Openness*: organizations must inform their clients and train their employees about their privacy policies and procedures;
9. *Individual Access*: an individual has a right to access personal information held by an organization and to challenge its accuracy if need be; and
10. *Provide Recourse*: organizations are to inform clients and employees of how to bring a request for access, or complaint, to the Chief Privacy Officer, and respond promptly to a request or complaint by the individual.

Personal Information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual—that is, it is information which can, directly or indirectly, identify an individual. Personal information does not include the name, title, business address, or business telephone number of an employee of an organization.

Personal information includes information in any form (e.g., printed/electronic) including home address, home phone number, age, personal e-mail address, race, national or ethnic origin, colour, religion, sexual orientation, marital status, mental or physical disability, family members' names, employee files, identification numbers, evaluations, disciplinary actions, the existence of a dispute and related opinions, comments, social status, income, credit and bank records, donation information, loan records, or medical records.

All personal information obtained, compiled, maintained, and disclosed for Canadian Friends Service Committee by third-party agents and contractors must comply with standards comparable to this policy and applicable federal/provincial privacy legislation. Contractual provisions requiring such compliance are incorporated into all third party agent and contractor agreements.

Collection of Information

Canadian Friends Service Committee collects personal information for the following intended purposes:

- employee records
- salary and benefits records
- information required for organizational records
- fundraising and donor information
- board member information
- legal/regulatory requirements
- distribution of communications and publications

Personal information can only be used for the purposes for which it is collected. Specific permission must be sought if personal information is to be used for any other purpose than that for which it was initially collected.

Accountability

Canadian Friends Service Committee is responsible for all personal information in its possession or custody, which means information, whether factual or subjective in nature, about an identifiable individual. This includes personal information that has been transferred to, or received from, a third party in the course of activities or purposes for which consent has been given.

Personal information collected by the Canadian Friends Service Committee includes, but is not limited to, health and financial information, such as

- name and age
- address, telephone number, and e-mail address
- medical records
- identification numbers (such as Social Insurance Number, passport number)
- Next of kin information
- income, assets, and transaction information
- opinions, evaluations, and comments related to health and financial information
- credit records and loan records

Safeguards

Canadian Friends Service Committee has a centralized records and archives management process for the collection, management, retention, and disposition of personal information. Categories of individuals for which personal information is being collected and maintained include employees, board members, volunteers, and donors. Personal information is contained in paper and electronic records at the Canadian Friends Service Committee. Each employee of the Canadian Friends Service Committee, whether full-time, part-time, contract, or retired, has confidential and secure personnel, benefits, and payroll files. Donors and third party service providers have files that include confidential personal information. Databases collect personal information required to accommodate event attendance and programs.

All personal information is the property of the Canadian Friends Service Committee and all individuals have controlled access to their personal information. Personal information is to be stored under lock and key or is password protected if in electronic format, and only certain authorized individuals have access to it.

Retention and Transfer of Information

Personal information is retained only as long as it is required to meet any potential obligations or legal or government requirements. Once the personal information is no longer required, it will be destroyed except in cases where federal and/or provincial retention rules apply. When this personal information is no longer required, methods to destroy it are carried out using the same care as is used for preserving this information. In some cases, records are of archival value and transferred to the archives where restrictions are in place consistent with privacy standards.

If personal information is transferred to a third party for processing (for example, when printing cheques, managing claims and client statements, or for data processing) the person or organization providing the services on our behalf are required to protect confidentiality of all information in a manner consistent with that used in the Canadian Friends Service Committee, or as required by law.

Access to Personal Information

Each person has the right to access their own personal information that is in the possession or control of the Canadian Friends Service Committee. This right extends to knowing which third parties have received this information from the Canadian Friends Service Committee.

In order to access this personal information, requests should be made in writing to the General Secretary of Canadian Friends Service Committee, who acts as a privacy officer for the organization, stating as specifically as possible which personal information is being requested.

The Canadian Friends Service Committee has the right to refuse a request for access to personal information if:

- the information is protected by solicitor-client privilege
- granting access would reveal confidential financial information
- doing so would reasonably be expected to threaten the safety or security of another individual
- the information was collected for purposes related to the detection and prevention of fraud
- the information was generated in the course of a formal dispute resolution process, or
- the information would likely reveal personal information about another individual

Contact Information

For more information, please contact the Canadian Friends Service Committee's General Secretary at cfsc@quakerservice.ca.