

Privacy Standards Policy of Canadian Yearly Meeting

1. Purpose

Canadian Yearly Meeting of the Religious Society of Friends (CYM) has a Privacy Standards Policy (PSP) applicable to all individuals who work in the CYM Office, are employed by CYM or serve the CYM on CYM committees or in other ways. This Policy describes the procedures to be used in proper collection, retention and distribution of personal information.

2. Privacy Officer

2.1 Each year Representative Meeting of CYM will name a Privacy Officer and Privacy Committee whose responsibility is to ensure compliance with the PSP.

2.2 The Privacy Committee will review the PSP annually.

2.3 This Policy will be included in the Personnel Policy Handbook. Employees and clerks of CYM committees will be informed of the proper care of personal information in order to keep it confidential and secure.

3. Collection

3.1 Records containing personal information are retained by CYM.

3.2 All employees have access to their own personal information owned by CYM. Any personal information obtained by other organizations and agencies of the CYM must comply with the standards comparable to the CYM PSP.

4. Definitions

4.1 Personal Information: Any factual or subjective information, recorded (or not) in any format, about an identifiable individual. Personal information does not include the name, job title or business contact information of an employee of an organization.

4.2 The legislation considers personal information located in any format which would include any of the following: home address and phone number, age, marital status, family members' names, employee files including photographic images, identification numbers, ethnic origin, evaluations, disciplinary actions, the existence of a dispute, opinions, comments, social status, income, credit records, donation information, loan records, and medical records.

4.3 Commercial Activity: Any particular transaction, act or conduct, or any regular course of conduct that is of a commercial (or fund-raising) character, including the selling, bartering for or leasing of donor, membership, or other personal lists.

4.4 Consent: Voluntary agreement with what is being done or proposed. Consent can either be expressed or implied. Express consent is given explicitly, either in writing or orally. Express consent is unequivocal and does not require any inference on the part of the organization seeking consent. Implied consent arises where consent may reasonably be inferred from the action or inaction of the individual, for example, how registration forms are used for Yearly Meeting of CYM.

4.5 Disclosure: Making personal information available to others outside the organization.

4.6 Use: Refers to the treatment and handling of personal information within an organization.

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5. Principles

There are 10 principles established by Schedule 1 of the Personal Information Protection and Electronic Documents Act of Canada that describe the handling of personal information. These principles include: accountability, identifying purposes, consent, limiting collection, limiting use, disclosure and retention, accuracy, safeguards, openness, individual access, and provision of recourse.

It is our intent to comply with all of these principles.

5.1 Accountability:

- establish a Privacy Officer to ensure compliance
- establish a Privacy Committee to work with the Privacy Officer
- perform an annual review of Privacy Policy
- protect all personal information held by CYM or transferred to a third party for processing
- instruct that CYM Office and each CYM committee follow the established procedures for the collection, retention, and distribution of information in their care.

5.2 Identify the Purpose:

We will identify the reasons for collecting personal information before or at the time of collection.

CYM Office and each CYM committee will review all personal information holdings to ensure they are all required for a specific purpose.

- we will ensure that the purposes for which personal information is used are limited to what a reasonable person would expect under the circumstances.

5.3 Obtain Consent:

- for information collected by CYM, implied consent will be the norm, subject to ongoing review by the Privacy Committee.

5.4 Limit Collection of Personal Information:

- CYM will limit the amount and type of personal information collected based on what is necessary for the identified purposes.
- identify the type of personal information needed and the handling policies for same.

5.5 Limit the Use, Disclosure and Retention:

- establish the best practices and legal requirements which will be used for overall records management in the office. This will involve maintaining appropriate records disposition, when timely, for the records that contain personal information.
- dispose of personal information that is no longer needed – document any new purpose for the use of personal information.
- dispose of any information that does not have a specific purpose or that no longer fulfils its intended purpose.
- ensure appropriate means of disposal for personal information such as shredding or deleting electronic records.
- Ensure that records of archival value are transferred to archives where restrictions are in place consistent with privacy standards

5.6 Accuracy:

- information on an individual collected by CYM is to be as complete and up-to-date as possible — taking into account its use and the interests of the individual.

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5.7 Safeguards:

- we take seriously our responsibility to protect personal information against loss or theft, to safeguard the information from unauthorized access, disclosure, copying, use or modification, and to protect personal information regardless of what format it is stored on.
- we will review and update security measures regularly taking the following factors into consideration in selecting appropriate safeguards:
 - sensitivity of the information
 - amount of information
 - extent of distribution
 - format of the information
 - type of record

5.8 Openness:

- we will inform donors, volunteers, committees and employees of our policies for the management of personal information.

5.9 Access:

- when requested, we will inform individuals of any personal information that is held on them including: how the information is or has been used, and we will provide a list of any organizations to which it has been disclosed. Individuals will have access to their personal information. We will correct or amend any personal information if its accuracy and completeness is challenged or found to be deficient.

5.10 Recourse:

- we encourage you to contact us with any questions or concerns you have about this privacy policy. If you have a question concerning this policy or if you have a complaint, please contact: Privacy Committee, Canadian Yearly Meeting, 91A Fourth Ave., Ottawa ON K1S 2L1.

6. Exceptions to Consent Principles with respect to Collection, Use and Disclosure

CYM may use personal information without consent:

- if it is clearly in the individual's best interests and consent is not available in a timely way.
- if personal information is required to investigate a breach of an agreement or contravention of a federal or provincial law.
- if it is publicly available.
- for an emergency that threatens an individual's life, health, or security.

CYM may disclose and use personal information without consent:

- to a lawfully authorized government authority.
- to comply with a subpoena, warrant, or order made by a court or other judicial body.

7. Online Donations Policy

CYM has policies and procedures designed to protect the privacy of our people who donate on-line. We will never share or sell your personal information with any external organization. Any personal information (including name, address, credit card number, phone number etc.) are protected internally. All personnel with access to personal information are aware of our policies.