



St. Lawrence River Institute of Environmental Sciences

POLICIES AND PROCEDURES

Section:	Governance		
Policy:	Confidentiality and Privacy		
Board Approval:	April 24, 2015		
Issued to:	All Manual Holders	Replaces:	
Issued by:		Date:	

1 BACKGROUND

The St. Lawrence River Institute of Environmental Sciences (River Institute) values and respects the privacy of individuals, including our Board members, employees, volunteers, donors, sponsors, and sponsored children and their families and takes reasonable steps to safeguard the personal information entrusted to us.

2 SCOPE

- 2.1 This Policy applies to personal information of the River Institute's Board members, employees, volunteers, donors, sponsors, sponsored children and their families, and all persons affiliated with the River Institute, which is collected, used or disclosed by the River Institute during the course of its activities.
- 2.2 Principles outlined in this Policy shall be treated as essential for contract compliance with suppliers, consultants and other contracted organizations.

3 DEFINITIONS

- 3.1 River Institute: This is an abbreviation for the St. Lawrence River Institute of Environmental Sciences.
- 3.2 Personal Information: Under the *Personal Information Protection and Electronic Documents Act*, personal information does not include the name, business title, business address, telephone number and any employee ie: information on a business card. Personal Information does include any factual or subjective information, recorded or not, about an identifiable individual including name and contact information, identification numbers or codes, and sensitive personal information.
- 3.3 PIPEDA: Personal Information Protection and Electronic Document Act. For further information, see the website: <http://www.privcom.gc.ca>.

- 3.4 Consent: Individuals can give consent in many ways. For example:
- a) an application form may be used to seek consent, collect information, and inform the individual of the use that will be made of the information. By completing and signing the form, the individual is giving consent to the collection and the specified uses;
 - b) a checkoff box may be used to allow individuals to request that their names and addresses not be given to other organizations. Individuals who do not check the box are assumed to consent to the transfer of this information to third parties;
 - c) consent may be given orally when information is collected over the telephone; or
 - d) consent may be given at the time that individuals use a product or service.

4 POLICY

- 4.1 The River Institute will comply with applicable privacy legislation (PIPEDA), principles and practice.
- 4.2 All individuals affiliated with River Institute will take all reasonable steps to maintain the confidentiality of all confidential organizational and personal information.
- 4.3 The organization will maintain a Privacy Policy for distribution to members, clients and other interested parties, and will post this Policy on its website.
- 4.4 The organization will maintain high standards of physical and electronic security wherever personal information is being handled.
- 4.5 Employees have a right to understand, access and correct their personal information. Employee personal information collected, used or disclosed will be subject to the same care and conditions as outlined for other personal information.
- 4.6 Personal information may be collected without knowledge or consent only in the following circumstances:
- a) In the event of an emergency that threatens the life, health or security of an individual.
 - b) If there are reasonable grounds to believe that the information could be useful to investigate the contravention of a law.
 - c) The collection is in the interest of the individual and consent cannot be obtained in a timely way.
 - d) The collection of the information with the individual's knowledge or consent would compromise the availability or accuracy of the information and the collection is required to investigate the contravention of a law.
 - e) The information is publicly available.
- 4.7 Personal information may be disclosed without knowledge or consent only in the following circumstances:
- a) In the event of an emergency that threatens the life, health or security of an individual.
 - b) To a lawyer representing the organization.
 - c) To collect a debt owed to the organization by the individual.
 - d) To a government institution that has indicated disclosure is required on a matter relating to national security or the conduct of international affairs.
 - e) The information is publicly available.

- f) If required by law.
- g) For other circumstances listed in subsection 7(3) of PIPEDA.

4.8 The River Institute does not sell, barter or lease donor, sponsor or other fundraising lists.

4.9 The River Institute limits the amount and type of personal information collected to that which is reasonably necessary to fulfill the purposes identified. Personal information is collected by fair and lawful means. The River Institute makes efforts to advise individuals of the purposes for which their personal information will be used prior to collection. Individuals are also informed that they have the right to withdraw their consent at any time.

5 PROCESS

5.1 All individuals affiliated with the River Institute will respect and protect the privacy of personal information by complying with the 10 privacy principles required by the Personal Information Protection and Electronic Documents Act (PIPEDA), as follows:

- a) Accountability
- b) Identifying purpose
- c) Consent
- d) Limiting collection
- e) Limiting use, disclosure and retention
- f) Accuracy
- g) Safeguards
- h) Openness
- i) Individual access
- j) Challenging compliance

5.2 All persons affiliated with the River Institute will protect and respect confidential and personal information by:

- a) Taking all reasonable steps to secure and protect the information, as follows:
 - (i) Electronic records of personal information will be subject to limited access by authorized personnel in the performance of their duties.
 - (ii) Printed records of personal information, when they are not under the control of authorized personnel, will be kept in a secure location.
- b) Disclosing to individuals that personal information is being collected and directing them to the Privacy Policy.
- c) Destroying the information when it is no longer required. Personal information will be destroyed two years after it is no longer required.

5.3 The Executive Director will appoint a Privacy Officer for the River Institute whose name and contact information will be publicly available as the point of contact for all inquiries or issues related to privacy of personal information.

5.4 All requests for access to personal information and all contact with the Privacy Commissioner of Canada will go through the Privacy Officer.

- 5.5 The Privacy Officer is responsible for:
- a) Implementation and maintenance of the organization's privacy policies for all individuals affiliated with the River Institute whose records are required.
 - b) Thorough review of the River Institute's collection, use and disclosure of personal information to ensure that only required information is dealt with.
 - c) Communication of this Policy for individuals affiliated with the River Institute to the public and to all employees, including necessary employee training.
 - d) Acting as the resource for the River Institute on matters relating to the Policy.
 - e) Ensuring that the organization's systems and procedures meet all legal compliance requirements and also a standard of excellence for respect of personal information.
 - f) Documenting and analyzing all complaints regarding the use, retention or disclosure of personal information.
 - g) Recommending changes to the Policy and related procedures when deemed necessary in order to respect the principles of this Policy.
- 5.6 Requests from an individual to provide information about their personal information being collected, used or disclosed by the organization will be answered within 20 days. No fee will be charged for this service.
- 5.7 If an individual withdraws consent, previously given, for the use of personal information, the Privacy Officer will take all necessary steps to cease the organization's use of the information within 30 days, subject to other provisions of this policy.
- 5.8 The River Institute collects:
- a) Donor personal information, which may include name, address, credit card and banking information, for purposes of:
 - (i) collecting donations or sponsorships,
 - (ii) donor/ sponsor history,
 - (iii) donor/ sponsor relationships,
 - (iv) issuing receipts,
 - (v) offering opportunities for further donation or sponsorships,
 - (vi) offering volunteer opportunities,
 - (vii) sending River Institute communications, and
 - (viii) market research and determining how to engage donors.
 - b) Employee and volunteer personal information, which may include name, address, social insurance number, banking information, and employment history, for purposes of:
 - (i) establishing, managing and ending employment and volunteer relationships,
 - (ii) communicating with employees and volunteers; and
 - (iii) vulnerable sector screening activities.
 - c) Personal information relating to children participating in programs is collected with the consent of the child's parents and/or guardians or, if appropriate, with the consent of the child.