

Model Policy

Introduction

The protection of personal information is important to *[insert organization's name]* and we have a policy and procedures dealing with the protection of privacy. Any questions about this policy can be directed to our Privacy Officer, *[you may insert Privacy's Officer's name]* at *[insert contact number etc. for Privacy Officer]*.

Our employees play an important role in protecting personal information. Our employees are required to adhere to this policy and take all reasonable steps to ensure that personal information is protected from unauthorized access.

Collection, Use and Disclosure of Personal Information

[Include this paragraph if you are a contractor and do not normally deal with individuals as customers. Delete the following two paragraphs] Our organization does not usually collect personal information from individuals as customers (other than business contact information), since we generally deal only with other companies. In the event that we do collect personal information from an individual customer, that information will only be used by us to administer the contract for the product and/or services. When we do deal with individuals as customers we collect the following types of personal information:

[Include this paragraph if you have a retail business and regularly collect personal information from customers. Delete the preceding paragraph and the following paragraph.] We collect personal information from our customers in order to administer the contract for products and/or services. We collect the following types of personal information from our customers:

[Include this paragraph if you are both a contractor and a retailer and regularly collect personal information from customers – delete the preceding two paragraphs] Although we deal commonly with other companies and in those cases do not collect personal information other than business contact information, we also deal with individual customers. We collect the personal information of our individual customers in order to administer the contract for products and/or services. When dealing with these individual customers we collect the following types of personal information:

1. Customer name;
2. Customer address and telephone number;
3. *[Include in this list other examples of the types of personal information you collect – the list does not have to be exhaustive but should provide good examples of the type of information you collect]*

This personal information is collected for the following purposes:

[This list should describe the reasons that you collect personal information – what do you use the information for? For example:

1. *In order to contact the customer for instruction and billing purposes;*
2. *For the administration of the contract for services;]*

We only collect personal information directly from the customer except when we have the customer's consent to collect information from elsewhere or are permitted by law to collect it without the customer's consent.

We only use a customer's personal information for the purposes outlined above. If we need to use the personal information for any other purpose we will contact the customer and obtain consent prior to that use.

We disclose customers' personal information to the following third parties:

1. *[This list should include the names of all third parties to whom you disclose personal information, if any.]*

We disclose this information in order to *[insert reason for disclosing the personal information.]* We do not disclose personal information to third parties for any other purposes.

Our customers have the right to withdraw consent for our collection, use or disclosure of their personal information at any time. However, if a customer does so it may affect his/her ability to *[insert whatever the applicable product or service is.]* If a customer wishes to withdraw consent, or has any questions about withdrawing consent, he or she can contact our Privacy Officer.

Business contact information is not protected by this policy. This type of information is not considered to be personal information and may be collected, used and disclosed without consent.

Consent

In most cases customers consent to us collecting, using and disclosing personal information for the purposes outlined above by simply agreeing to provide us with the personal information. *[If you collect, use or disclose personal information for any purposes other than simply providing the product or service – for example, for your mailing list or for disclosure to others in your industry for their mailing lists - include the following sentences.]* However, there may be cases where we require explicit consent, including *[insert the other uses and disclosures]*. The withdrawal of this consent will generally not affect a customer's ability to obtain the product or service they require, however by providing us with consent for the previously outlined uses we can *[insert examples of why the customer might want to allow you to use their information for other uses or disclosures, for example -.serve the customer better / offer the customer alternatives, etc.]*

Storing your Personal Information

We only keep personal information for as long as is necessary for the purposes outlined above. This may include keeping the information after a project is completed in order to resolve any problems or concerns that may arise. We are also required by law to maintain certain records for set amounts of time. We have appropriate safeguards in place to protect personal information and when we no longer need the information it is destroyed. We try to keep personal information as accurate as possible and customers can assist us by providing us with updated information when necessary. Information can be updated by contacting *[insert name of Privacy Officer]*.

Access

Our customers have the right to access the personal information we hold about them. A customer can access his/her personal information by making a request to our Privacy Officer. The Officer will provide the necessary forms and assistance to make the request and obtain the information. If the customer believes that some of the personal information is incorrect he or she can request that the information be corrected.

We may charge our customers for out-of-pocket expenses in responding to an access request. If we decide that a charge is appropriate we will provide the customer with a written estimate prior to providing access. Any concerns with the estimated charge should be directed to our Privacy Officer.

Accountability

We apply our best efforts to protect our customer's privacy. If our customers have any concerns they are free to contact our Privacy Officer. We hope that the Officer will be able to resolve any problems. If concerns are not resolved, the Officer can provide information on making a formal complaint.

Model Policy *continued*

Collection, Use and Disclosure of Personal Employee Information

[The following information is only for your employees – you may wish to provide this information to your employees as a separate document or you may wish to have two versions of your policy – one for external audiences and one for internal audiences.]

“Personal employee information” is personal information collected, used or disclosed for the purposes of establishing, managing or terminating an employment relationship. We can collect, use and disclose this information without consent but we will only collect, use and disclose the personal information that is necessary for the purpose of administering the employment relationship. “Personal employee information” may include the following:

1. name;
2. home address and phone number;
3. employment history;
4. disciplinary record;
5. medical information or disability;
6. social insurance number;
7. age;
8. bank account;
9. wage or salary paid;
10. sex;
11. family status;
12. marital status.

In administering the employment relationship we may use this information to perform tasks such as providing benefits, paying wages and generally managing the workplace.

Some personal employee information will be disclosed to the following third parties:

1. *name of benefit provider;*
2. *name of payroll company;*
3. *union etc.*

We will not disclose personal employee information to any other third party unless we provide our employees with prior notification.

Our personal employee information is safeguarded to prevent unauthorized access, use and disclosure. Particularly sensitive information such as medical information is stored separately and is only accessed by those with a need to do so.

It is important that we keep our personal employee information as up to date as possible. Please notify us as soon as possible of any changes to employee contact information or beneficiary / dependent information.

Employees may access their personal employee information by making a request to *[insert name of Privacy Officer.]* Any concerns about the collection, use or disclosure of

personal employee information can also be addressed by this individual. Please feel free to contact *[insert name of Privacy Officer]* with any questions.