



Title: **Privacy Policy, CSAWCC-2023-002**

Submitted By: Joshua Bell, Chief of Staff;
and Executive Assistant to the President
and CEO

Purview: Board of Directors

Date of Approval: 15 October 2023

Privacy Policy

BE IT RESOLVED that 14855086 CANADA ASSOCIATION (hereinafter "the Corporation" or "CSAWCC") do adopt the "PRIVACY POLICY" effective upon a successful vote by the Board of Directors.

1. Overview

- 1.1 Whereas the Corporation recognizes privacy protection and the confidentiality of information are fundamental to the business practices of the Corporation. The Corporation is committed to protecting the privacy and security of your personal information obtained by reason of your relationship with the Chamber.
- 1.2 Whereas the Corporation this Privacy Policy has been designed to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and corresponding provincial privacy acts.

2. Adoption

- 2.1 Be it therefore resolved, that the Board of Directors adopt the following Privacy Policy.
- 2.2 Be it further resolved, that no provisions of this policy shall override the foundational principles present in the By-laws, and where there is a discrepancy between this policy and the Corporation's By-laws, the By-laws shall prevail.

3. Accountability

- 3.1 The CSAWCC is accountable for all personal information under its control. Any questions about the CSAWCC's handling of personal information should be directed to info@csawcc-ccfcsa.ca. Please see below for more information about the process of referring questions about the CSAWCC's handling of personal information.



4. Purposes of Personal Information

- 4.1 The purpose for which the CSAWCC collects personal information will be identified at or before the time the information is collected. The CSAWCC may collect personal information for the purposes of:
- administering CSAWCC membership and providing member services and benefits, such as the creation and maintenance of membership lists, Business Resource Guide (virtual or printed), and databases to which the membership of the CSAWCC, as well as third-party service providers, may have access, providing they have agreed to abide by this Privacy Policy.
 - registering for CSAWCC events, for example, the Annual General Meeting;
 - purchasing various CSAWCC products or services including document certification; and
 - processing and administering the above or other purposes as necessary.
- 4.2 The CSAWCC will never use personal information for any other purpose than identified at or before the time of collection.

5. Consent

- 5.1 The CSAWCC seeks consent for all personal information it collects, uses and discloses through information provided to individuals prior to collection, or at the time of collection.
- 5.2 If a person or organization voluntarily provides information, that person or organization has consented to the collection, use and disclosure of personally identifiable information as described in this Privacy Policy.
- 5.3 As required by the PIPEDA, the CSAWCC will never use personal information for any purpose other than that for which that person or organization consented. Should the CSAWCC require personal information for a new purpose, it will contact the individual or organization to seek consent for that new use.

6. Limits for Collecting, Using, Disclosing, and Keeping Personal Information

- 6.1 The CSAWCC does not collect, use or disclose personal information except when consent has been given on a voluntary basis. There may be occasions where more



specific personal information is necessary for the CSAWCC to proceed with a request for information, or provide a product or service. In such cases, it will provide a description of the information required. In all cases, the CSAWCC limits the amount and type of information collected to that which is required to provide the product, or service. Whatever the case, such information will be kept strictly confidential.

6.2 With reference to the above, the CSAWCC will retain active personal information only as long as is necessary to provide the requested product, service or information. To facilitate legal reporting and retention requirements the CSAWCC archives inactive information.

6.3 The CSAWCC will not normally sell or otherwise provide personal information to third parties. However, in specific instances, it may transfer information to service providers in the course of its administrative procedures or member services. Whenever such personal information is transferred, the CSAWCC requires the service provider to respect the Privacy Policy and restricts them from using or disclosing personal information for any purpose other than the assigned provision of services. Any personal information the CSAWCC retains is kept in such a manner as to ensure its security and confidentiality at all times.

7. **Safeguarding Personal Information**

7.1 The CSAWCC respects the privacy of our members, partners, potential website visitors, and Internet users and will protect that privacy as vigorously as possible. It stores personal information in electronic and physical files that are secure. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure.

7.2 While the CSAWCC strives to protect personal information, it cannot absolutely ensure or warrant the security of any information electronically transmitted or received. Therefore, while the CSAWCC cannot protect information in transit, once it is received, it undertakes to ensure its security on the CSAWCC's servers.

8. **Accuracy of and Access to Personal Information Collected**

8.1 The CSAWCC makes every effort to keep personal information as accurate, complete, current, and relevant as necessary for the identified purposes. The
8.2 CSAWCC does not routinely update personal information.



8.3 The CSAWCC makes readily available its Privacy Policy and related procedures for managing personal information. In addition, it posts the Privacy Policy on the CSAWCC's website. Questions about the handling of personal information by the CSAWCC may be directed to info@csawcc-cccfsa.ca.

By written request, an organization or individual may review and edit their personal information as collected by the CSAWCC. The CSAWCC will inform them of what personal information it has, what it is used for and, in cases where it has been disclosed, to whom it has been disclosed.

8.4 There may be exceptional circumstances as provided by the PIPEDA under which the CSAWCC may not be able to give individual access to personal information. Should this be the case the CSAWCC will provide an explanation, as provided for in the PIPEDA. Requests should be submitted by email and addressed to info@csawcc-cccfsa.ca. The request should include the following information: the nature of your request, including whether you wish to view and/or edit information or to inquire about the use and/or disclosure of the information.

8.5 The CSAWCC will respond to your request within 30 days from the receipt of the request. If it is unable to respond within this time period, it will send a notice of explanation and extension. If the CSAWCC is not able to disclose all personal information, it will provide, by return correspondence, the reason for not doing so.

9. **Miscellaneous**

9.1 This policy shall only be subject to amendment by the Board of Directors.

9.2 This policy shall be subject to amendment, review, or striking every one (1) year following its ratification by the Board of Directors.

10. **Application**

10.1 This policy shall apply to the entire Corporation, its subsidiaries, the National Council, and Board of Directors, and any members who come into contact with the Corporation by any means.