

## **CFUW PRIVACY POLICY**

CFUW is committed to safeguarding the personal information entrusted to us by our club members, employees, Fellowships applicants and the public where applicable. We will respect and protect the privacy of personal information by complying with the privacy principles required by the federal Privacy Act 1) and the related regulations.

CFUW regional, provincial councils and clubs are governed by privacy legislation in each jurisdiction. Where there is no specific legislation, each will be governed by the federal Privacy Act and related regulations.

This policy applies to CFUW and to any person providing services on our behalf.

The CFUW does not sell, exchange or rent any personal information with anyone. We will only use the information provided for the purpose for which it was collected.

The Procedure Section below gives the details on how we protect your personal information.

### **Procedures**

CFUW operates in accordance with Canada's Privacy Laws.

<http://www.parl.gc.ca/Content/LOP/Researchpublications/prb0744--e.htm>

The complete CFUW Privacy Policies are found on the CFUW-FCFDU website at: [www.cfuw.org /en-ca/aboutus.aspx](http://www.cfuw.org/en-ca/aboutus.aspx)

The CFUW Website Privacy Policy is found on the CFUW-FCFDU website at: <http://www.cfuw.org/AboutUs/tabid/65/ctl/Privacy/language/en-CA/Default.aspx>

### **Section 1: CFUW Members**

#### **What is personal information?**

Personal information means information about an identifiable individual. This includes an individual's name, home address, email address and phone number, age, sex, marital or family status, any identifying number, financial information, educational history, etc.

#### **What personal information does CFUW collect?**

We collect only the personal information that we need for the purposes of providing services to our members, including personal information needed to:

- deliver requested products and services
- send out association membership information

We normally collect personal information directly from our members. We may collect your information from other persons with your consent or as authorized by law.

We inform our members, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a member volunteers information for an obvious purpose (for example, producing a credit card to pay a membership fee when the information will be used only to process the payment).

## **Consent**

We ask for consent to collect, use or disclose member personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask members to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).

A member may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose member personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health or safety.

## **How do we use and disclose personal information?**

We use and disclose member personal information only for the purpose for which the information was collected, except as authorized by law. For example, we may use member contact information to deliver goods.

## **How do we safeguard personal information?**

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

### **Access to records containing personal information**

Individuals have a right to access their own personal information in a record that is in the custody or under the control of CFUW, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to the CFUW Executive Director who is designated to ensure compliance with the federal Privacy Act and related regulations. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted.

### **Emails sent to Groups**

Emails sent to groups will be sent using the “blind carbon copy” (bcc) facility which protects members’ privacy and reduces spam.

### **Questions and Complaints**

If you have a question or concern about any collection, use or disclosure of personal information by CFUW or about a request for access to your own personal information, please contact the CFUW Executive Director who is designated to ensure compliance with the federal Privacy Act and related regulations

## **Section 2: Use of the CFUW Directory and Club and Membership Data Bases**

The following restrictions apply to the Directory and Club and membership data bases:

May not be used for any commercial purposes that have not been approved by the CFUW Board of Directors

1. May not be sold, lent, or provided to any third parties in any form. This restriction applies to all third parties regardless of the involvement of

Regional Councils, CFUW Clubs, CFUW Club members or Members at Large.

2. May not be used by any third parties for any purpose. This restriction applies to all third parties regardless of the involvement of Regional Councils, CFUW Clubs, CFUW Club Members or Members at Large.

### **Section 3: Fellowships**

Fellowship applicants are required to provide personal information when they apply for a CFUW award. A personal information consent form is signed by all fellowship applicants and a further personal information consent form is signed by all fellowship winners

Information collected about fellowship applicants and applications will be held securely for one year from the time of collection and destroyed the following June. The exception to this rule is that information on Award winners will be retained in perpetuity in a secure location.

With the consent of Fellowship applicants, information about winners is used for promotion of the Fellowships program.

### **Section 4: Public Websites & Social Media**

Each of the three CFUW websites contains a Statement of Privacy which governs data collection and usage.

The Website Privacy Policy is displayed on the CFUW-FCFDU website at <http://www.cfuw.org/AboutUs/tabid/65/ctl/Privacy/language/en-CA/Default.aspx>

### **Facebook**

Facebook has its own privacy policies with which members should familiarize themselves. Interactions with Facebook are governed by the privacy policy of that Company. In situations where Facebook has links to other sites, the individual's information is governed by that company's privacy statements. CFUW has no authority over the privacy policies of Facebook or any other third parties.

### **Section 5: Employees**

#### **What is personal employee information?**

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, etc.

CFUW can collect, use and disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.

### **What personal employee information does CFUW collect, use and disclose?**

We collect, use and disclose personal employee information to meet the following purposes:

- Determining eligibility for employment or volunteer work, including verifying qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues if they arise
- Administering pay and benefits (paid employees only)
- Processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims) (paid employees only)
- Complying with requirements of funding bodies (e.g. lottery grants)
- Complying with applicable laws (e.g. Canada Income Tax Act)

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes.

- Contact information such as your name, home address, telephone number
- Criminal background checks
- Employment or volunteer information such as your resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
- Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc. (paid employees only)
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only)
- Other personal information required for the purposes of our employment or volunteer relationship

We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

### **What information do we provide for employment/volunteer references?**

In some cases, after your employment or volunteer relationship with us ends, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees and volunteers to other

organizations who request references without your specific consent. The personal information we normally provide in a reference includes:

- Confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering
- General information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship

### **For Further Information**

The CFUW's Privacy Officer is Executive Director, Robin Jackson; email:

[cfuwed@rogers.com](mailto:cfuwed@rogers.com)

If, having shared your concerns with us you are still not satisfied, you may file a complaint with the Privacy Commissioner of Canada by accessing their website:

[www.priv.gc.ca](http://www.priv.gc.ca)