



## **NorthWest Ontario Counselling & Consulting - PIPEDA Privacy Compliance Policy**

### **Definition – PIPEDA**

Personal Information Privacy and Electronic Document Act (PIPEDA) sets out the ground rules for how private-sector organizations collect, use or disclose personal information in the course of commercial activities across Canada. It also applies to the personal information of employees of federally-regulated works, undertakings, or businesses (organizations that are federally-regulated, such as banks, airlines, and telecommunications companies).

### **Policy**

We're all responsible for understanding and adhering to this policy to ensure that NWOCC is compliant with PIPEDA requirements by adhering to its 10 Principles as follows:

#### **1. Accountability**

- NWOCC and staff will comply with all 10 of the principles.
- Kaylee Heyens-McMahon and Brady Heyens are responsible for NWOCC's compliance.
- Personal information held by NWOCC or transferred to a third party for processing will be protected.

#### **2. Identify Purpose for Collection**

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

- Before or when any personal information is collected, we'll identify why it's needed and how it will be used.
- We'll document why the information is collected.
- We'll inform the individual from whom the information is collected why it's needed.
- If we identify any new purpose for the information, we'll obtain the individual's consent before using it.

#### **3. Obtain Informed Consent**

Consent is considered valid only if it's reasonable to expect that the individual to whom NWOCC's activities are directed would understand the nature, purpose and consequences of the collection, use or disclosure to which they're consenting.

We may collect personal information without an individual's knowledge or consent only as outlined as specific exceptions under PIPEDA.

- We'll specify what personal information we're collecting and why in a way that our customers can clearly understand.
- We'll inform the individual in a meaningful way of the purposes for the collection, use or disclosure of personal data.
- We'll obtain the individual's consent before or at the time of collection, as well as when a new use of their personal information is identified

#### 4. Limit Collection of Personal Information

- We won't collect personal information indiscriminately.
- We won't deceive or mislead individuals about the reasons for collecting personal information

#### 5. Limit Use, Disclosure & Retention

- We'll use or disclose personal information only for the purpose for which it was collected unless the individual consents or the use or disclosure is authorized by PIPEDA.
- We'll keep personal information only as long as necessary to satisfy the purposes.
- We have guidelines and procedures in place for retaining and destroying personal information.
- We'll keep personal information used to make a decision about a person for a reasonable period of time.
- We'll destroy, erase or render anonymous any personal information that's no longer required for an identified purpose or a legal requirement.

#### 6. Keep Personal Information Accurate

- We'll make every effort to minimize the possibility of using incorrect information when making a decision about the individual or when disclosing information to third parties.

#### 7. Safeguard Personal Information

- We'll protect personal information against loss or theft.
- We'll safeguard the information from unauthorized access, disclosure, copying, use or modification.
- We'll protect personal information regardless of the format in which it's held.

#### 8. Make Information About Policies & Procedures Available

- Our clients have access to our privacy practices on our website

#### 9. Provide Access to Personal Information

With some specific exceptions outlined in PIPEDA, individuals have access to the private information NWOCC has about them

- When requested, we'll inform individuals if we have any personal information about them.
- We'll explain how it is or has been used and provide a list of any organizations to which it has been disclosed.
- We'll give individuals access to their information.
- We'll correct or amend any personal information if its accuracy and completeness is challenged and found to be deficient.
- We'll provide a copy of the information requested, or reasons for not providing access, subject to exceptions set out in Section 9 of PIPEDA.
- We'll note any disagreement on the file and advise third parties where appropriate.

#### 10. Provide Recourse

- Our complaint procedure is available on our website and includes information about available recourse.
- We'll promptly investigate all complaints received.
- We'll take appropriate and reasonable measures to correct information-handling practices

#### Resources

It's NWOCC's intention that this policy is compliant with Ontario law.

- <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>
- <https://laws-lois.justice.gc.ca/eng/acts/P-8.6/FullText.html>