

Privacy Policy			
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POLICY STATEMENT/ PURPOSE

Findhelp information Services (Findhelp) cares about the privacy of personal information. Although Findhelp has no federal, provincial or municipal obligations under any privacy legislation, we have chosen the Freedom of Information and Protection of Privacy Act (FIPPA) as a guideline for our policy. We have completed an extensive analysis of its practices and have chosen to implement the necessary reforms to bring Findhelp into compliance.

SCOPE

This policy applies to all directors, volunteers, employees and contractors

DEFINITIONS

Personal Information means recorded information about an identifiable individual. It includes information relating to:

1. Race, national, or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual
2. Education, medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions with which the individual has been involved
3. Identifying numbers, symbols or other particulars assigned to that individual
4. Address, telephone number, fingerprints or blood type of the individual
5. Personal opinions or views of the individual except where they relate to another individual
6. Correspondence sent to an institution by an individual that is implicitly or explicitly of a private or confidential nature and replies to that correspondence that would reveal the contents of the original correspondence
7. Views or opinions of another individual about the individual
8. The individual's name where it appears with other personal information relating to the individual or where disclosure of the name would reveal other personal information

about the individual.

Personal information includes information that is not recorded and is otherwise designated as personal information as defined above.

Personal information DOES NOT INCLUDE the name, title, contact information or designation of an individual in business, professional or official capacity.

GUIDELINES

This policy directly supports two of our agency's core values: *Service to Others* and *Respect*.

Findhelp strongly supports FIPPA values and objectives. The Act and its associated regulations distinguish and govern five ways in which organizations treat information: collection, use, retention, disclosure and disposal. Findhelp has carefully considered each of the five areas and has crafted a privacy policy which fulfills all of Findhelp's obligations. The five areas are used as the basis for headings in this policy.

The following elements will guide our Privacy Policy at Findhelp:

1. No personal information will be collected without the consent of the individual to whom the information relates
2. Personal information will only be used for the stated purpose and no other
3. Personal information will be safeguarded as appropriate
4. Personal information may be disclosed on request to qualified individuals
5. Findhelp's privacy policy is openly available on websites and on request
6. Complaints regarding Findhelp's privacy policy will be addressed by Findhelp's privacy officer.

PROCEDURES/PROCESS

1. Collection

- 1.1. Individuals submitting personal information will have consented to the purpose of the information collection or authorized another manner of collection.
- 1.2. Personal information is collected only for business purposes.
- 1.3. The individual submitting the information shall be informed of the principal purposes for which personal information is to be used, the legal authority for the collection and the title and business contact information of the organization's privacy officer who can answer questions about the collection.

2. Use

- 2.1. All personal information that is collected by FINDHELP is used for defined purposes ('enumerated purposes').
- 2.2. Any personal information that is collected will be used only to further the enumerated purposes.
- 2.3. If Findhelp intends to use personal information it has collected for a new purpose, Findhelp will request consent for the new purpose.
- 2.4. When requested to do so, Findhelp will cease to use an individual's personal information

3. Retention

- 3.1. Personal information that has been used by Findhelp will be retained for a reasonable length of time in order to insure that the individual has a reasonable opportunity to obtain access to the personal information.
- 3.2. Findhelp uses safeguards commensurate with the sensitivity of the information Findhelp collects.
- 3.3. Findhelp conducts periodic audits of all the personal information in Findhelp's possession.

4. Disclosure

- 4.1. Any individual has the right of access to personal information about that individual contained in a personal information bank in the control of Findhelp.
- 4.2. Findhelp will disclose personal information in its custody or under its control when the individual to whom the information relates has identified the information and consented to its disclosure.
- 4.3. Findhelp will respond to any request for personal information being held by Findhelp within 30 days of receipt of such a request.
- 4.4. Findhelp's response will include the requested information OR a legitimate reason why the information cannot be provided within 30 days.
- 4.5. Findhelp will require satisfactory identification before any release of personal information.
- 4.6. All Findhelp employees sign confidentiality agreements which forbid disclosure of any personal information collected by Findhelp.

4.7. When Findhelp discloses information to third parties for processing, Findhelp contractually binds the third party to privacy practices.

5. Disposal

5.1. When personal information is no longer useful for the enumerated purposes, it is destroyed.

6. Openness

6.1. Findhelp has endeavoured to make Findhelp's privacy policy available and understandable.

6.2. Findhelp assigns a privacy officer to ensure compliance with applicable privacy legislation

7. Recourse

7.1. Any complaints regarding Findhelp's privacy policy and practice are forwarded to the Agency's Privacy Officer where they will be addressed.

7.2. Any individual has the right to correct personal information where the individual believes there is an error or omission therein.

7.3. Findhelp has appointed a Privacy Officer. This person's contact information will be publicly available and posted on the corporate website.

8. Policy Modifications

Findhelp reserves the right to periodically modify the above policy.

