



Tuesday, August 19, 2008

## **Code of Privacy**

**Toronto Chapter #193** is a non-profit organization belonging to ASIS International and is monitored by the Policies and Procedures of this organization. Our Privacy code is modeled after the Canadian Standards Association Model Code for the Protection of Personal Information (PIPEDA)

**Toronto Chapter #193** will continue to maintain the standards by which we have operated, while adapting to the new responsibilities that come with compliance to the federal Personal Information Protection and Electronics Documents Act (PIPEDA).

### **1. ACCOUNTABILITY**

**Toronto Chapter #193** is responsible for personal information under our control. We have designated an individual to be our Chief Privacy Officer, to ensure compliance with the principals as set out in the code.

**Toronto Chapter #193** will continue to educate our members as well as assist our members with issues of compliance.

We will ensure that any third parties used to process personal information also maintain our level of protection of personal information.

### **2. IDENTIFYING PURPOSES**

**Toronto Chapter #193** will identify the purpose for which personal information is collected at or before the time the information is collected. We will ensure that all assignments and requests for personal information are compliant with PIPEDA, and document why the information is collected.

Personal information collected as part of the investigation of a contravention of the law may include information pertaining to individuals involved in criminal activity, individuals suspected of involvement in criminal activity, or with knowledge of criminal activity, as well as those who may advance an investigation by providing information relating to the identity of those involved or suspected of criminal activity.

Personal information collected in the investigation of the breach of an agreement may pertain to individuals who are party to an agreement, have knowledge of



the terms and conditions of an agreement, who have knowledge of a breach of an agreement, or may advance an investigation by providing information relating to a breach of an agreement.

### **3. CONSENT**

We will obtain consent from individuals for the collection, use or disclosure of personal information, and document that consent. We will never obtain consent by deceptive means.

In many instances, obtaining the knowledge and consent of individuals would defeat the purpose of an investigation. Personal information will only be collected, used and disclosed by **Toronto Chapter #193** without consent in accordance with section 7 of the Personal Information Protection and Electronics Documents Act, S. C. 2000, c 5 (PIPEDA).

Express consent will be used whenever possible and in all cases where the information is sensitive.

**Toronto Chapter #193** may also conduct investigations using implied consent, when it is appropriate to collect, use or disclose personal information.

### **4. LIMITING COLLECTION**

The personal information collected will be limited to that which is necessary for the purposes we have identified. We will collect the information by fair and lawful means, and only for legitimate purposes. We will not be deceptive with regard to the purpose for which the information was obtained.

### **5. LIMITING USE, DISCLOSURE, AND RETENTION**

Personal information will not be used or disclosed for purposes other than those for which it is collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Personal information will be destroyed, erased or rendered anonymous once it is no longer required for the purpose for which it was collected.



## 6. ACCURACY

Personal information we collect shall be as accurate, complete and current, as is necessary for the purposes for which it is to be used.

We will attempt to make every effort to ensure the information used is accurate and up to date. We will work with our members in this regard and assist them in the transfer of information as well as verify the information we receive before conducting investigations. We will inform our members of any errors or omissions so that they may take steps to correct the information in their own files.

## 7. SAFEGUARDS

**Toronto Chapter #193** will safeguard all personal information appropriate to the sensitivity of the information. Our facilities are adequately protected using state of the art technology both from a physical and electronic standpoint.

The executives have been instructed on Privacy Act regulations. Additionally, all documents are shredded under secure control and electronically stored information is deleted from our hard drives.

## 8. OPENNESS

We shall make readily available to individuals specific information with regard to our policies and practices relating to the management of personal information. A copy of this policy may be obtained by accessing our web site or contacting our Chief Privacy Officer : **Chapter Chair – ASIS Toronto Chapter 193. For the current Chapter Chair please refer to our Contact Us/Committee's area of the website.** <http://www.asistoronto.org/committees.php>

## 9. INDIVIDUAL ACCESS

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information, and shall be given access to that information. Any individual may be able to challenge the accuracy and completeness of the information and have it amended as appropriate.



There are lawful exceptions to the above: When the information is protected by Solicitor /Client privilege, or personal information with regard to another person may be revealed, as well as safeguarding the safety of an individual's life or security.

Other exception exists and can be discussed with anyone with concerns.

## **10. CHALLENGING COMPLIANCE**

An individual may address a challenge concerning compliance to our Privacy Officer. We will investigate all complaints and take appropriate measures to correct information handling practices and provide a response to registered complaints within a reasonable time period.