

## *Co-op Name*

### **PRIVACY POLICY**

#### 1. Introduction

- 1.1 *Co-op Name* has adopted this policy out of respect for the privacy of individuals and because some of the personal information *CO-OP NAME* collects, uses, discloses and retains is governed by the *Personal Information Protection and Electronic Documents Act* (PIPEDA)
- 1.2 Personal information is information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.
- 1.3 *CO-OP NAME* is responsible for the protection of personal information and the fair handling of it at all times, throughout the organization and in dealings with third parties. Care is essential in collecting, using, disclosing and retaining personal information. This policy identifies the general classes of personal information collected and standard retention periods for each class in Appendix A.

#### 2. Application of this Policy

- 2.1 Members, directors, employees, independent contractors acting in *CO-OP NAME*'s name, and any other persons acting on *CO-OP NAME*'s behalf must all follow this policy. If unsure about the requirements of *CO-OP NAME*'s system for managing personal information, they may consult the Corporate Secretary who fulfills the role of Personal Information Protection Officer.
- 2.2 Personal information can be collected, used, disclosed and retained in paper or other media or both. This Policy applies to personal information in any form.

#### 3. Restrictions on Collection, Use and Disclosure of Personal Information

- 3.1 Subject to Article 5, the knowledge and consent of the individual are required for the collection, use and disclosure of personal information.
- 3.2 *CO-OP NAME* and its representatives may request and collect only the limited personal information needed to deliver high-quality services, manage the organization effectively and fulfill its obligations to co-operative sector and government agencies, business associates, *CO-OP NAME* members and employees. Any personal information collected may be used only for the

purpose for which it was gathered, unless an individual gives specific permission for another use or unless otherwise permitted by law.

- 3.3 Information is collected only by fair and lawful means.
- 3.4 Subject to Article 5, *CO-OP NAME* may not collect, use or disclose personal information unless three conditions have been met:
  - the information is needed for a purpose identified before the collection;
  - that purpose has been explained to the person before the information is collected;
  - the person has consented in advance to the collection of information for that purpose and understands that they may withdraw their consent at any time.
4. Access to Personal Information
  - 4.1 *CO-OP NAME* will publish this policy on its website, and will, on request, provide an explanation of what personal information *CO-OP NAME* collects, how and by whom it is used and how an individual can arrange to see any personal information *CO-OP NAME* holds about them.
  - 4.2 Subject to Article 5, access to personal information that *CO-OP NAME* holds about an individual will be restricted to that individual and persons who need the information for the purpose for which it was gathered.
  - 4.3 Should an individual point out any errors in the personal information *CO-OP NAME* holds about them, *CO-OP NAME* will correct the error, if possible. Where appropriate *CO-OP NAME* will advise any third parties to whom the doubtful information had been disclosed that the accuracy of the personal information they received had been challenged.
5. Exceptions to Requirement for Consent for *CO-OP NAME* - Collection, Use or Disclosure
  - 5.1 *CO-OP NAME* may use or disclose personal information about an individual without consent if the information is used to take action during an emergency that threatens the life, health or security of any individual.
  - 5.2 *CO-OP NAME* may disclose personal information without consent to an investigative body for the purpose of enforcing any law of Canada or Ontario or carrying out a lawful investigation.
  - 5.3 *CO-OP NAME* may collect, use or disclose personal information without consent for any other reason allowed by law.
  - 5.4 Any collection, use or disclosure must be authorized by the Board of Directors, or in the case of emergency, ratified by the Board of Directors after collection, use or disclosure.

6. Storage of Personal Information

- 6.1 *CO-OP NAME* must store personal information securely so as to prevent its unauthorized use or disclosure.

7. Retention of Personal Information

- 7.1 *CO-OP NAME* will not keep personal information longer than it is needed to achieve the purpose for which it was collected. Where personal information contributes to the making of a decision *CO-OP NAME* may need to review or explain, *CO-OP NAME* will keep the information as long as a review or explanation would be meaningful.

The procedure set out in Appendix A identifies the general classes of personal information *CO-OP NAME* gathers and standard retention periods for each one.

- 7.2 As appropriate, *CO-OP NAME* will review the purposes for which it collects personal information, including information in electronic form, the general classes of information collected, and the retention period for each class, and will modify this Policy and Appendix A as required.

8. Destruction of Personal Information

- 8.1 *CO-OP NAME* will review its files annually and, in accordance with the provisions of Appendix A, will destroy or erase any personal information no longer needed for the purpose for which it was collected, including in all electronic forms.

9. Misuse of Information and Complaints

- 9.1 Any individual dissatisfied with *CO-OP NAME*'s handling of their personal information may make a formal complaint to the Personal Information Protection Officer who will determine if *CO-OP NAME* is complying with this Policy and PIPEDA.

10. Internal Policy Education

- 10.1 *CO-OP NAME* will ensure that its employees, committees, board of directors and as necessary, consultants sign an acknowledgment each year that they will comply with this policy, its underlying principles and aims, and the procedures that accompany it.

## Appendix A

### Classes of Collected Personal Information and Standard Retention Periods

CLASS	STANDARD RETENTION PERIOD
<p>Housing Application:</p> <ul style="list-style-type: none"> <li>- Email address</li> <li>- Phone numbers</li> <li>- Social Insurance Number</li> <li>- Date of birth</li> <li>- Source and statement of income</li> <li>- Disclosed credit history statements</li> <li>- Previous landlord name and contact information</li> </ul>	<p>During the period of time an applicant's name remains on the waiting list for housing:</p> <ul style="list-style-type: none"> <li>- A copy of page 1 of the application is kept by a member of the Membership Committee.</li> <li>- The applicant's contact information is kept electronically on the co-ordinator's computer, and is periodically printed and kept by a member of the Membership Committee.</li> </ul> <p>An approved application for membership is kept for the duration of the membership in a secured member file.</p> <p>Once a membership has ended the member's application is kept for five years in the secured archives.</p> <p>Deadfiled applications are kept for two years in a secured file.</p>
<p>Subsidy Application:</p> <ul style="list-style-type: none"> <li>- Phone numbers</li> <li>- Source and statement of income</li> </ul>	<p>A subsidy application is kept in a secured file for the duration of the subsidy and the member's membership in the co-operative.</p> <p>Once membership in the co-operative has ended the application is kept for five years in the secured archives.</p> <p>Subsidy calculations are kept indefinitely in electronic form on the co-ordinator's computer, and are backed up on a removable device kept in a secured location both on- and off-site.</p>

<p>Application for Relocation within <i>CO-OP NAME</i>:</p> <ul style="list-style-type: none"> <li>- Date of birth</li> <li>- Phone numbers</li> </ul>	<p>A relocation application is kept for the duration of the member's membership in a secured member file.</p> <p>Once a membership has ended the member's relocation application is kept for five years in the secured archives.</p>
<p>Personnel:</p> <ul style="list-style-type: none"> <li>- Employee files</li> <li>- Employment contracts</li> </ul>	<p>Employee records are kept in secured files for the duration of employment.</p> <p>Employment contracts are kept in a binder by each respective staff liaison officer for the duration of their term.</p> <p>Once employment has ended employee records are kept for five years in the secured archives, except those records for which the law requires a lengthier retention.</p>
<p>Minutes:</p> <ul style="list-style-type: none"> <li>- Confidential meeting minutes</li> </ul>	<p>Confidential board and committee meeting minutes are kept indefinitely in a secured file and in the secured archives.</p> <p>They are kept indefinitely in electronic form on the co-ordinator's computer, and are backed up on a removable device kept in a secured location both on- and off-site.</p>