

ERDO Privacy Policy

ERDO (Emergency Relief & Development Overseas) is committed to respecting the privacy of its employees, PAOC credential holders, candidates, donors, sponsors and contacts. In demonstration of our commitment to privacy and in voluntary compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA), we have created the following Privacy Policy (the "Policy"). The Policy has been designed to reflect our commitment to the principles outlined in PIPEDA.

All officers, directors, staff members and volunteers of ERDO are required to comply with the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in this Policy.

All other persons or organizations who act for, or on behalf of, ERDO are also required to comply with the principles and the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in this Policy.

- **Accountability**
- **Identifying Purposes**
- **Consent**
- **Limiting Collection**
- **Limiting Use, Disclosure and Retention**
- **Accuracy**
- **Safeguards**
- **Openness**
- **Individual Access**
- **Challenging Compliance**
- **Privacy Officer**

Principle 1 - Accountability

- 1.1 ERDO is responsible for personal information which we collect, use or distribute and any personal information in our custody or under our control.
- 1.2 ERDO has appointed the Director of Resource Development as the Privacy Officer who will be responsible for overseeing the Policy as well as any inquiries, requests or concerns relating to privacy matters. The Privacy Officer may, from time to time, designate one or more individuals within ERDO to act on their behalf.
- 1.3 We will continually create and update procedures in accordance with this Privacy Policy to govern the handling of personal information and respond to complaints.

Principle 2 - Identifying Purposes

- 2.1 ERDO is committed to ensuring that the purposes for which personal information is collected, used, or disclosed are identified and are reasonable and appropriate in the circumstance.

2.2 ERDO will only collect personal information from employees, PAOC credential holders, candidates, donors, sponsors and contacts that is necessary to fulfill the following purposes:

- To verify identity
- To assess ongoing suitability for employment and/or licensing
- To identify individual preferences
- To understand individual needs
- To provide requested products and services
- To inform regarding campaigns, appeals, annual results, etc.
- To make contact for fundraising
- To meet government requirements
- To facilitate historical research

Principle 3 - Consent

3.1 ERDO will obtain express consent of staff members, PAOC credential holders, candidates, donors, sponsors and contacts to collect, use or disclose personal information wherever possible and appropriate, and ensure the individual can reasonably understand why and how the information will be used when it is given. Seeking consent is inappropriate where the individual is under 16 years of age. Seeking consent is inappropriate or may be impossible where the individual is seriously ill, or mentally incapacitated.

3.2 Consent can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the employees, PAOC credential holders, candidates, donors, sponsors and contacts voluntarily provide personal information for that purpose.

3.3 In general, the use of products and services by an employee, PAOC credential holder, candidate, donor, sponsor or contact, or the acceptance of employment or benefits by an employee constitutes implied consent for ERDO to collect, use and disclose personal information for all identified purposes. Consent may also be implied where employees, PAOC credential holders, candidates, donors and contacts are given notice and a reasonable opportunity to opt out of their personal information being used for certain purposes and they do not opt out. Individuals may withdraw their consent at any time subject to legal or contractual notice, by providing reasonable notice to ERDO of their intent to withdraw their consent.

3.4 The following are examples of when ERDO may collect, use or disclose the personal information of a staff member, PAOC credential holder, candidate, donor, sponsor or contact without their consent:

- When the collection, use or disclosure of personal information is permitted or required by law;
- When collection is clearly in their best interest and we are unable to obtain their consent in a timely way;
- In an emergency that threatens an individual's life, health or personal security;
- When disclosure is required for statistical, archival collection or research purposes;

- When the personal information is available from a public source (e.g. a telephone directory);
- When the personal information is available through observation at a public event which the individual attended voluntarily;
- When the collection, use or distribution is necessary to determine their suitability to receive an honour, award or similar benefit;
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt or other obligation;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law;
- When the personal information is voluntarily disclosed by the person to whom it applies using equipment or data owned by ERDO (e.g. through the use of company computers, email addresses, etc.).

Principle 4 - Limiting Collection

- 4.1 ERDO will limit the collection of personal information to that which is necessary for identified purposes. ERDO will only collect personal information by fair and lawful means and for purposes that a reasonable person would consider appropriate in the circumstances.

Principle 5 - Limiting Use, Disclosure and Retention

- 5.1 ERDO will not use or disclose personal information for purposes other than those for which it was collected except with the consent of the individual or as required or permitted by law.
- 5.2 ERDO will only retain personal information as long as it is needed for the purposes for which it was collected or consented to. ERDO will maintain reasonable schedules to ensure that personal information is reviewed on an ongoing basis to determine relevance and if retention is required.
- 5.3 Every individual has the right to request their data be deleted in a quick and timely manner. When personal information collected is no longer relevant to its purpose or when it is permitted by law, ERDO will ensure that it is deleted, destroyed or made anonymous in a secure manner.

Principle 6 - Accuracy

- 6.1 ERDO will take reasonable efforts to ensure that personal information is accurate and complete.
- 6.2 ERDO will update information when it is necessary to fulfill the purpose for which the information was collected or when notified by an individual. A request to correct personal information can be made in writing or by phone. Sufficient detail to identify the personal information and the correction being sought must be provided.

Principle 7 - Safeguards

- 7.1 ERDO shall stress to both staff members and volunteers the importance of safeguarding the confidential nature of personal information and will provide training in this regard.
- 7.2 ERDO will routinely review and update our security measures. These may include: physical measures, such as locking filing cabinets and restricting access to offices as appropriate; organizational measures, such as security clearances and policies governing access to information; and technical measures, such as the use of passwords and encryption.
- 7.3 ERDO shall protect personal information disclosed to third parties by contractual agreements and/or third-party policies that stipulate the confidentiality and safeguard requirements that are comparable to our own.
- 7.4 ERDO shall, from time to time, use web applications where personal information is sent to another jurisdiction for processing, and where it may be accessed by the courts, law enforcement and national security authorities of that jurisdiction.

Principle 8 - Openness

- 8.1 ERDO is committed to making its privacy policies and procedures clear and available to all interested parties.
- 8.2 Any questions or concerns regarding our policy or procedure may be directed in writing to the Privacy Officer.

Principle 9 - Individual Access

- 9.1 Staff members, PAOC credential holders, candidates, donors, sponsors and contacts have a right to access their personal information, subject to limited exceptions, including but not limited to:
 - Situations of solicitor-client privilege
 - Situations where disclosure may reveal the personal information of another individual
 - Situations where the health or safety of an individual may be jeopardized
 - Situations where the information was provided confidentially, such as the references for candidates for employment
- 9.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought and should be forwarded to the attention of the Privacy Officer.
- 9.3 In certain situations, it may not be possible to provide access to all the personal information that is held, and a request may be refused in whole or in part, providing the reasons for refusal and the recourse available. For example, information may not be provided if to do so would reveal personal information about a third party or jeopardize the security of another.

Principle 10 - Challenging Compliance

- 10.1 It is ERDO's policy that all privacy-related complaints shall be investigated. Complaints regarding the Privacy Policy or the use of personal information should be made in writing to the Privacy Officer.
- 10.2 ERDO's procedure for dealing with complaints is as follows:
- Record the date and nature of a complaint when it is received
 - Acknowledge receipt of the complaint promptly within two business days
 - Review the matter fairly and impartially, providing to the individual, where possible, access to all relevant records
 - Notify the individual of the outcome of the investigation promptly and clearly
 - If the complaint is found to be justified, take appropriate measures, including, if necessary, amending our policies and practices. We will also, as required, correct any inaccurate or incomplete information when possible.
- 10.3 If the Privacy Officer is unable to resolve the concern, the employee, PAOC credential holder, candidate, donor, sponsor or contact may also write to the Chief Executive Officer of ERDO (or his designate). If they are still unable to resolve the concern, they may also write to the Federal Privacy Commissioner.
- 10.4 The contact information for the Privacy Officer is as follows:

Privacy Officer – Director of Resource Development
ERDO
2450 Milltower Court, Mississauga ON L5N 5Z6
905-542-7400