

Cross Country Yukon Policies & Procedures

Privacy Policy

Preamble

1. Cross Country Yukon (CCY) is subject to the *Personal Information Protection and Electronic Documents Act* (“the *Act*”) which sets out principles of fair information practices that in turn form ground rules for the collection, use and disclosure of personal information.
2. In accordance with the *Act*, CCY is responsible for the protection of personal information and the fair handling of it at all times both throughout the organization and in dealings with third parties.

Aim

3. The aim of the CCY Privacy Policy is to provide direction for how personal information will be collected, used and disclosed within CCY.

General Policy

4. CCY will comply fully with the principles and exceptions set out in the *Act*.
5. CCY requires that its member divisions establish and implement policies that are consistent with the CCY Privacy Policy.

CCY Principles of Fair Information Practices

Identifying Purposes

6. Before or when any personal information is collected by or on behalf of CCY, CCY will identify the reason(s) for collecting the information and how it will be used. If the reason(s) for collecting the information and/or how it will be used changes after the information is collected, CCY will inform the affected individual(s) and obtain consent before the information is used.

7. Personal information may be collected from more than one source and combined.

Consent

8. CCY requires an individual's consent to the collection, use and/or disclosure of personal information:

- a. Before or when any personal information is collected by or on behalf of CCY, or when the reason(s) for collecting the information and/or how it will be used changes, CCY will obtain consent from the individual whose personal information is collected, used or disclosed.
- b. For an individual who is a minor, seriously ill, or mentally incapacitated, consent may be obtained from a legal guardian, or person having power of attorney.
- c. Consent may be obtained in person, by phone, by fax, by mail, by email or by internet, or by any other reasonable method.
- d. Where consent is required, CCY will provide the individual with a privacy protection notice either before or when any personal information is collected and prior to any use or disclosure of the personal information collected.

Limiting Collection

9. CCY limits the information it collects to what is needed for specific purposes identified by CCY at the time the personal information is collected.

Limiting Use, Disclosure and Retention.

10. CCY will limit the use and disclosure of the personal information it has collected to the purpose(s) for which it was collected, unless the individual otherwise consents or the use or disclosure is authorized by law.

11. Where possible, CCY will use contracts or other agreements to ensure the protection of personal information that is transferred to a third party for use, including but not limited to:

- a. The personal information transferred to a third party will be limited to what is needed for the third party to fulfil the contract or agreement.
- b. The personal information transferred to a third party will be limited as to the use of that information to those purposes necessary to fulfil the contract or agreement.
- c. The third party will be required to refer to CCY any requests for access to or complaints about the information provided.
- d. When the personal information is no longer required by the third party, the third party will be required to either return the information to CCY or dispose of it in a manner acceptable to CCY.

12. Personal information collected by or on behalf of CCY will be retained only as long as necessary to satisfy the purpose(s) for which it was collected. Any personal information collected by or on behalf of CCY that is no longer required for an identified purpose or a legal requirement will be destroyed, erased or rendered anonymous in a manner that will prevent improper access.

Accuracy

13. CCY will make efforts to keep the personal information collected as accurate, complete and up-to-date as is necessary, taking into account the purpose(s) for which the information is collected and the interests of the individual.

Safeguards

14. CCY will make efforts to protect the personal information collected with appropriate safeguards and security measures:

- a. Information may only be accessed by approved officials or employees, or by other persons designated as such by CCY, and only to the extent necessary for the identified purpose(s).
- b. Personal information will only be disclosed when reasonable steps are taken to identify individuals and to establish their right to access the personal information requested.

- c. Personal information may only be created, modified or deleted by the CCY Office Coordinator or his/her/delegate as set out herein.
- d. Physical safeguards include restricted physical access to CCY offices and secure storage facilities.
- e. Technological safeguards include restricted file access, computer passwords, firewalls and file encryption procedures.

Openness

15. Any requests or enquiries about this policy or procedures related to this policy can be directed to the CCY Office.

Individual Access

16. Any individual that has provided personal information to CCY shall have access to that personal information collected, used or disclosed by or on behalf of CCY.

17. An individual may review, amend or update the personal information collected about him/her.

18. CCY will take appropriate measures to confirm the identity of the requestor and his/her right of access to the personal information requested. If CCY refuses access to an individual to the personal information collected, CCY will provide to the individual the reason(s) for the refusal and any recourse available.

19. Where possible, a response to a request for access to personal information by an individual will be made within 30 days of the request.

20. CCY will make every effort to provide access of any individual to his/her personal information at minimal or no cost. If a cost is anticipated to provide the information requested, CCY will advise of the cost prior to disclosing the information.

Challenging Compliance

21. CCY will investigate and respond to all concerns about any aspect of the collection, use and disclosure of personal information, in a timely

manner. Where necessary, an individual will be advised of available avenues of complaint, including the Office of the Privacy Commissioner of Canada.

22. CCY will take appropriate measures to correct any inaccurate personal information that is identified or to modify policies or procedures where necessary.

Responsibility and Accountability

23. CCY is responsible for maintaining and protecting all personal information that it collects.

24. The CCY Office Coordinator has the primary responsibility for ensuring compliance with the CCY Privacy Policy as set out herein and has the authority to intervene on privacy issues that relate to any of CCY's operations. The CCY Office Coordinator is responsible for the following:

- a. Collection, use and disclosure of personal information;
- b. Responding to requests and general inquiries for personal information;
- c. Responding to requests for correction to personal information;
- d. Responding to complaints about the collection, use and disclosure of personal information by CCY;
- e. Explaining the purpose(s) for the collection, use and disclosure of personal information;
- f. Explaining the procedure to withdraw consent and the consequences, if any, of such a withdrawal.

25. The Office Coordinator may delegate any responsibilities set out herein to a member of the CCY Board of Directors, another CCY employee, or to an individual approved by CCY. All CCY officials and employees, or any individual approved by CCY to handle any responsibilities set out herein, are required to understand the nature and scope of and adhere to the CCY Privacy Policy.

