

Sarnia Lambton Workforce Development Board	
DEPARTMENT: All Departments	POLICY
POLICY: Customer Privacy Policy	
ADOPTION DATE: March 31, 2014	REVIEW DATE: April 1, 2018

Purpose

To ensure all the Sarnia Lambton Workforce Development Board (SLWDB) programs and services are in compliance with privacy legislation set out in PIPEDA as well as through the Information and Privacy Commissioner of Ontario.

Policy Overview

This policy apply to all goods and services that are delivered by the Sarnia Lambton Workforce Development Board, by any means including in person, by telephone, electronically, by mail, visually, orally or by written means.

The policy applies to all Employees, volunteers, Board Members and third parties who deal with the public, on behalf of the Sarnia Lambton Workforce Development Board.

Policy

The Sarnia Lambton Workforce Development Board shall meet its duties and responsibilities under the following terms:

1. Personal Information

- That personal information includes the following: name, personal address, personal phone numbers including cell/mobile, all email addresses regardless of whether they are personal or professional, and resumes.
- Any other personal information gathered will be for the direct hiring of an individual as an employee or contractor for SLWDB.

2. Accountability

- Privacy Officer for the Sarnia Lambton Workforce Development Board is the Executive Director. In the absence of an Executive Director the Chairs of the Board will be considered the de facto Privacy Officer.
- The Privacy Officer will respond to all internal and external privacy questions on behalf of the organizations and will respond to any requests,

corrections and complaints. Including explaining the purposes for collection, use and disclosure of personal information.

- The Privacy Officer is charged with explaining to the public the steps and procedures for requesting personal information and filing complaints.
- Consent – please see section 5 of this policy.
- Employees will be informed of new privacy issues raised by technological changes, internal reviews, public complaints and court decisions.

3. Information for Customers and Employees

The Sarnia Lambton Workforce Development Board will provide to the public:

- A copy of this policy will be available to the public via the SLWDB.org website and will be posted in the place of business.
- Contained within this policy is what personal information is collected (see section 1), what information is retained (see section 4), correction of information (see section 7), how to make an inquiry (see section 9) and what is disclosed to third parties (see section 6)
- There will be NO cost to the public to request this policy or their personal information.
- This policy will be reviewed yearly by the SLWDB Board of Directors and more frequent if legislative changes require it.

4. Collection/Use/Disclosure/Retention

- Personal information does NOT need to be provided and can always be declined unless under a condition of employment with SLWDB.
- Only the personal information listed in this policy is to be collected or retained by employees of SLWDB.
- No personal information will be disclosed unless requested under legal proceedings. SLWDB will comply with all requests from relevant government agencies and the justice system.
- Information is held in locked cabinets and or electronic files that are protected by physical keys or electronic passwords.
- Personal information will be destroyed after the completion of a project.
- Email addresses where folks have requested to join our electronic mailings will be retained until such time as they choose to unsubscribe.
- Personal information is only accessible to employees and contractors while employed by the Sarnia Lambton Workforce Development Board.
- Surveys will clearly state the purposes for the collection if personal information is requested.
- Purposes for collection of personal information: is to corroborate data collected within a project and will be identified at the beginning of any project or overture of participation. No further information will be collected.

- If personal information is gathered and combined from more than one source it will NOT be used for anything other than the purpose consent was received for.
- When no longer required for the purpose identified, personal information is destroyed.

5. Consent

- Employees and volunteers of the Sarnia Lambton Workforce Development Board are required to obtain consent before collecting personal information.
- Consent must be obtained before any new use or new disclosure of information happens.
- Consent is implied if a business card is given, by documented verbal consent and written consent.
- Consent to withdraw personal information can occur at any time.
- Consequences of withdrawal for a partner or customer means they may no longer receive information, participate in activities or be a Member of the Board of Directors.
- Consequences of withdrawal for an employee would constitute grounds for possible termination.

6. Third Party Transfers

- No Third Party transfers of personal information will take place unless requested under legal proceedings. SLWDB will comply with all requests from relevant government agencies and the justice system.

7. Ensuring Accuracy

- Personal information can be corrected anytime by contacting the Sarnia Lambton Workforce Development Board.
- Personal information received from a third party is verified with the person it belongs to.

8. Safeguards

- Physical, technological and organizational security measures will be reviewed yearly along with this policy.
- Personal information is only accessible to the Privacy Officer and the Project Researcher.
- Employees have been made aware that they should properly identify individuals and establish their right to access the personal information before disclosure which is done through the Privacy Officer.

9. Requests for Access to Personal Information

- Personal information can be requested via email or phone call and will be verified to the best of the Privacy Officer's ability.
- A correction or inquiry can be requested via email or phone call and will be verified to the best of the Privacy Officer's ability.
- Should a complaint need to be filed please see section 10
- Access requests to personal information will be responded to within thirty (30) days.
- Retrieval of information will not disrupt operations of SLWDB.
- Personal information will be provided to an individual at NO cost.
- Personal Information will be listed in an easy to understand form and can be shared in alternative accessible formats if requested.

10. Handling Complaints

- Complaints must be made to the Privacy Officer of SLWDB in writing or suitable accessible equivalent
- Complaints will be dealt with within fifteen (15) days of receipt
- All complaints will be investigated
- All complaints will be reviewed by the Privacy Officer
- Complaints not successfully resolved can be followed up with the Information and Privacy Commissioner of Ontario as well as the Office of the Privacy Commissioner of Canada
- When complaints are found to be justified corrective measures will be taken, policies amended and employees retrained

11. End