Personal Information Protection Policy

Approved April 19, 2016

Ottawa StoryTellers (OST) is committed to safeguarding personal information entrusted to us and to managing personal information in accordance with all applicable laws. OST supports the foundational principles of the *Personal Information Protection and Electronic Documents Act (PIPEDA)* and has used them to develop the OST policy and practices described in this document. The *PIPEDA* principles are summarized in Appendix A.

What personal information do we collect?

We collect only the personal information that we need for the purposes of communicating and working with those with an interest in our organization, including personal information needed to:

- send information to members;
- inform patrons of upcoming programming;
- enrol individuals in a program or workshop; and
- manage volunteers and employees

Consent

We ask for consent to collect, use, or disclose personal information, except where an individual volunteer's information is for an obvious purpose; for example, producing a credit card to pay for a ticket when the information will be used only to process the payment. We don't retain credit card numbers.

We assume consent to continue to use personal information that we have already collected for the purpose for which it was collected.

An individual may withdraw consent to use their personal information at any time, unless the personal information is necessary for OST to fulfill legal obligations. We will respect the individual's decision, but we may not be able to provide certain products or services if we do not have the necessary personal information.

We may collect, use, or disclose personal information without consent only as authorized by law. For example, we may not request consent when the collection, use, or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health or safety.

What is personal employee or volunteer information?

This is personal information about an employee or volunteer that is collected, used or disclosed solely for the purposes of establishing, managing, or terminating an employment or volunteer relationship. In addition to contact information, it may include a Social Insurance Number, a performance review, etc.

What personal employee or volunteer information do we collect, use, and disclose?

We collect, use, and disclose personal employee information to meet the following purposes:

- determining eligibility for employment or volunteer work, including verifying qualifications and references;
- establishing training and development requirements;
- assessing performance and managing performance issues if they arise;
- administering pay and benefits (paid employees only);
- complying with requirements of funding bodies (e.g. grants); and
- complying with applicable laws (e.g. Income Tax Act)

We may collect, use, and disclose the following information to meet those purposes:

- contact information such as name, home address, telephone number;
- criminal background checks;
- employment or volunteer information such as resume (including educational background, work history; and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.;
- financial information, such as pay cheque deposit information and tax-related information, including social insurance numbers (paid employees only); and
- other personal information required for the purposes of our employment or volunteer relationship

We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal information.

What information do we provide for employment/volunteer references?

In some cases, after an employment or volunteer relationship ends, we will be contacted by other organizations and asked to provide a reference. It is our policy not to disclose personal information about our employees and volunteers to other organizations who request references without consent.

The personal information we normally provide in a reference includes:

- confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering
- general information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship

How do we safeguard personal information?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If an individual is aware of an error in our information about them, it is their responsibility to let us know.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information.

Access to records containing personal information

Individuals have a right to access their own personal information records. We do not provide access to information that would reveal personal information about another individual, except for the identified purposes noted above. If we refuse a request in whole or in part, we will provide the reasons for the refusal.

An individual may make a request for access to personal information by writing to Ottawa StoryTellers' Artistic Manager. Sufficient information must be provided to allow us to identify the information being sought.

Questions and complaints

If you have a question or concern about any collection, use, or disclosure of personal information by Ottawa StoryTellers, or about a request for access to your own personal information, please contact OST's Artistic Manager.

Appendix A:

A summary of the Ten Principles of the Personal Information Protection and Electronic Documents Act (*PIPEDA)*

The ten principles of *PIPEDA* that form the basis of OST's Privacy Policy are:

1. **Accountability**: organizations are accountable for the personal information they collect, use, retain, and disclose in the course of their commercial activities, including, but not limited to, the appointment of a privacy officer;

2. **Identifying Purposes**: organizations are to explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;

3. **Consent**: organizations must obtain an individual's express or implied consent when they collect, use, or disclose the individual's personal information;

4. **Limiting Collection**: the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes;

5. **Limiting Use, Disclosure and Retention**: personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the individual consents to the alternative use or disclosure;

6. **Accuracy**: organizations are required to keep personal information in active files accurate and up-to-date;

7. **Safeguards**: organizations are to use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.

8. **Openness**: organizations must inform their clients and train their employees about their privacy policies and procedures;

9. **Individual Access**: an individual has a right to access personal information held by an organization and to challenge its accuracy if need be; and

10. **Provide Recourse**: organizations are to inform clients and employees of how to bring a request for access, or complaint, to the privacy officer, and respond promptly to a request or complaint by the individual.

Records Management Committee
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