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Privacy Policy

Purpose

RhPAP is committed to safeguarding the personal information entrusted to us by our applicants, volunteers, learners, partners, staff and other stakeholders. RhPAP values the trust of these stakeholders and the public and recognizes maintaining this trust requires RhPAP to be transparent and accountable in how it treats the information shared with us.

Legislation

RhPAP is governed by the Personal Information Protection Act (PIPA). As a non-profit, PIPA applies to RhPAP only when personal information is used for commercial activities. Although this applies to very few of RhPAP's activities, our adherence to this policy reflects the importance we place upon the protection of privacy.

Definition of Personal Information

Personal information is any information that can be used to distinguish, identify or contact a specific individual, such as an individual's name, address, date of birth, email address, phone number, Social Insurance Number or credit card information. Personal information does not include business contact information when it is collected, used or disclosed for the purposes of enabling the individual or organization to be contacted in relation to business matters and for no other purpose. This includes information that would enable an individual to be contacted at a place of business and includes name, position, position name or title, business telephone number, business address, business email or business fax number.

Procedure

Collection and Use of Personal Information

We collect, use, and disclose Personal Information for the purposes that we identify to you. We may collect information from you in the following ways:

- Information you provide to use;
- Information we collect about you from our interactions with you (i.e. when you use our website or submit an application); or
- Information obtained from third-party sources.

Personal information will only be collected and used by authorized staff, volunteers and contractors consistent with the activities of RhPAP. Personal information is collected for the following reasons:

- To provide accommodations;
- To review and assess applications for grants, bursaries, grants and other investments;
- Providing information about the activities of RhPAP;
- Compliance with legal and regulatory requirements;
- To comply with requirements of funding bodies;
- To acknowledge and communicate with volunteers;
- To determine eligibility for engaging employment, volunteer and/or contracted services;
- To administer payments, disbursement, payroll, benefits and tax forms;
- To protect against fraud;
- To build and maintain relationships with stakeholders.

Limitations

Personal information collected by RhPAP will not be used or disclosed for purposes other than those for which it was collected, except with the consent of living individuals or existing corporation or as required



by law. Personal information will be retained for only as long as necessary for the fulfillment of these purposes. RhPAP does not trade, rent, or sell any personal information to third parties.

Consent

The manner in which RhPAP obtains consent for the collection of personal information varies with the type of information gathered and the method in what that information is gathered. Because of the nature of the information RhPAP collects, in many cases, consent is considered to be implied at the time of collection. Consent is implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the client, customer or stakeholder voluntarily provides personal information for that purpose. Consent may also be implied where a client, customer or stakeholder is given notice and a reasonable opportunity to opt-out of his/her personal information being used for mail-outs, the marketing of new services or products, and the client, customer or stakeholder does not opt-out.

RhPAP may collect, use or disclose personal information without the client's, customer's or stakeholder's knowledge or consent in situations outlined in S. 12, 15 and 18 of PIPA. Some examples include:

- When the collection, use or disclosure of personal information is required by law;
- In an emergency that threatens an individual's life, health or personal security;
- When the personal information is available from a public source;
- When we require legal advice from a lawyer;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law.

RhPAP will make a reasonable effort to ensure individuals are aware of the purposes for which information is collected at the time of collection. Individuals may withdraw their consent by contacting RhPAP, unless personal information is required to fulfill our legal obligations, as outlined above and within PIPA.

Furthermore, we will obtain client, customer, member, or stakeholder consent to collect, use or disclose personal information. Consent can be provided orally, in writing, electronically or through an authorized representative.

Personal information for employees or volunteers of RhPAP is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, performance reviews, etc. RhPAP can collect, use and disclose the personal information of employees and volunteers without their consent only for the purposes of establishing, managing or ending the employee or volunteer relationship.

Protection of Personal Information

Personal information gathered by RhPAP is kept in confidence. RhPAP staff is authorized to access personal information based only on their need to deal with the information for the reason(S) for which it was obtained. Measures are taken to ensure the integrity of this information is maintained and to prevent it from being lost or destroyed. Personal information is collected and used only for purposes a reasonable person would consider appropriate in light of the specific circumstances.

RhPAP makes reasonable security arrangements against risks such as unauthorized access, collection, use, disclosure, or disposal. Security measures have been integrated into the day-to-day operating practices of RhPAP and are outlined in various process documents. Employees are made aware of the importance of maintaining the confidentiality of personal information. Methods of protection include physical measures (e.g. locked cabinets, doors, shredders), organizational measures (e.g. limitation on access, scheduled destruction of old information), and technological measures (e.g. security system. Passwords, firewalls).



RhPAP makes reasonable efforts to ensure personal information is accurate and complete. RhPAP relies on individuals to notify us if there are any changes to their personal information. RhPAP will update its records promptly. RhPAP will retain personal information only as long as is reasonable to fulfill the purposes for which the information was collected and/or for legal or business purposes.

Sharing of and Access to Personal Information

RhPAP will use and disclose personal information only for the purpose for which the information was collected, except as authorized by law. If RhPAP wishes to use or disclose personal information for any new business purpose, RhPAP will seek and obtain the appropriate consent.

In general, personal information will not be rented, sold, or shared with any third party. However, as a regular course of business, it may be provided to those third parties that provide RhPAP with contracted services. In cases where such transfers take place, RhPAP will ensure the third party has comparable privacy safeguards in place.

Contributors, employees and volunteers may at any time request access to their personal information. Full access will be given, subject to reasonable timelines to allow for information retrieval.

Grant and bursary applicants and recipients may request access to the information on their files. Access will be given to all information that was provided by the applicant. The release of information relating to decisions made by RhPAP, the board or its committees will be at the discretion of the CEO.

Website and Electronic Information

RhPAP uses password protocols, encryption software and firewalls to ensure privacy and to protect personal and other information we have received online. Our software is routinely updated to ensure the ongoing protection of such information.

RhPAP is committed to protecting the privacy of those who use our website. This site compiles conventional log files to monitor and assess activity, including traffic and visits. This activity does not specifically identify and individual user without prior notice to the user through their use of the site.

RhPAP does not disclose information about individual visits to www.rhpap.ca. Neither is information on our website provided to outside companies. The information collected is solely used to improve and enhance the content and services of the website.

RhPAP uses cookies and similar tracking technologies to track the activity on our website and hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to the user's browser from a website and stored on the file user's device. Tracking technologies also used are beacons, tags and scripts to collect and track information and to improve and analyze our web service.

Users can instruct their browser to refuse all cookies or to indicate when a cookie is being sent. However, if users do not accept cookies, they may not be able to fully access our web services.

As stated above, RhPAP will advise users of our website whether we are using cookies and advise them as to the type of information we are gathering using cookies.

Contact Information

RhPAP is open about our privacy policies and procedures, addressing the management of personal information and is open to reviewing any breach of this privacy policy or other reasonable standards.



Questions or concerns relating to RhPAP's privacy practices and/or treatment of personal information should be brought to the attention of RhPAP's Manager, Finance and Office Services.