

<p>Atikokan Literacy Incorporated ADULT LEARNING CENTRE General Administration Policy/Procedure</p>
<p>Privacy Policy</p>
<p>APPROVED BY: Atikokan Literacy Incorporated Board of Directors</p>
<p>DATE: October 17, 2012 (O)</p>
<p>DISTRIBUTION:</p>

Atikokan Literacy Incorporated (collectively, "ALI") is committed to the protection of personal information. Accordingly, ALI adheres to the privacy principles, and accompanying commentary, set out below (the "Privacy Principles").

"Personal Information", as used in this Policy, means information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

Principle 1 - Accountability

We are responsible for all Personal Information in our possession or custody. Accountability for our compliance with the Privacy Principles rests with the Privacy Officer, even though other individuals within our organization may have responsibility for the day-to-day collection and processing of Personal Information.

If we disclose or transfer Personal Information to a third party for processing, we will use contractual or other safeguards to provide a comparable level of protection.

Principle 2 - Identifying Purposes

We identify the purposes for which we collect Personal Information. The purposes will be limited to those which are related to the work of the organization and which a reasonable person would consider appropriate in the circumstances.

We may collect, use and disclose Personal Information concerning our learners, volunteers, donors and employees for the following reasons:

- a) to provide services in accordance with the functions and mandate of the organization;
- b) to raise funds for the organization;
- c) to provide compensation and benefits to employees;
- d) to manage and continually develop our businesses and operations, including personnel and employment matters; and
- e) to meet legal and regulatory requirements.

If we plan to use Personal Information we have collected for a purpose not previously identified, we will identify and document this purpose before such use. We will make a reasonable effort to identify the purpose of collection to the individual from whom the Personal Information is collected, at or before the time the information is collected, orally, in writing, or by context.

When you visit our website, Personal Information is not collected that could identify you unless you choose to provide it voluntarily. We are not responsible for the privacy practices or the content of the websites to which it may link.

Principle 3 - Consent

We will seek consent for the use or disclosure of information at the time of collection. In certain circumstances, consent may be sought after the information has been collected but before use.

The way in which we seek consent, including whether it is express or implied, may vary depending upon the sensitivity of the information and the reasonable expectations of the individual. An individual can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. We will inform individuals of any implications of withdrawing consent.

We will not, as a condition of the supply of services, require an individual to consent to the collection, use, or disclosure of Personal Information beyond that required to fulfill legitimate purposes.

In certain circumstances, as permitted or required by law, we may collect, use or disclose Personal Information without the knowledge or consent of the individual. These circumstances include Personal Information which is subject to solicitor-client privilege or is publicly available as defined by regulation; where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way, to investigate a breach of an agreement or a contravention of a law, to act in response to an emergency that threatens the life, health or security of an individual, for ALI debt collection, or to comply with a subpoena, warrant or court order.

Principle 4 - Limiting Collection of Personal Information

We will limit the amount and type of Personal Information collected to that which is necessary for our identified purposes and we will collect Personal Information by fair and lawful means.

Principle 5 - Limiting Use, Disclosure, and Retention

We shall 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 by law. We shall retain Personal Information only as long as necessary for the fulfillment of those purposes.

Only our employees with a business need to know, or whose duties reasonably so require, are granted access to an individual's Personal Information.

Where Personal Information is no longer required to fulfill the purpose for which it was collected, it will be destroyed, erased, or made anonymous, provided there are no legal requirements for its continued retention.

Principle 6 - Accuracy

We will use our best efforts to ensure that Personal Information that is used on an ongoing basis and information that is used to make a decision about an individual, is accurate, complete, and up-to-date.

Principle 7 - Safeguards

We use safeguards to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. We

will make our employees aware of the importance of maintaining the confidentiality of Personal Information, and we will exercise care in the disposal or destruction of Personal Information to prevent unauthorized parties from gaining access to the information.

Our methods of protection will include physical measures (for example, locked filing cabinets and restricted access to offices), organizational measures (for example, security clearances and limiting access on a "need-to-know" basis), and technological measures (for example, the use of passwords and encryption).

Rules for keeping and disposing of personal information

- We will take reasonable steps to keep personal information accurate and up to date.
- We will keep personal information for at least seven years. We will take reasonable steps to keep it secure when we store it, move it, handle it, and destroy it.

Principle 8 - Openness

We will make information about our policies and procedures respecting Personal Information readily available to individuals. The information we will make available will include how to gain access to Personal Information, the type of Personal Information held by us, including a general account of its use, general information concerning our policies respecting Personal Information, and how to contact the person designated to be responsible for our privacy compliance.

Principle 9 - Individual Access

We will respond to an individual's written request within a reasonable time and at a reasonable or no cost. We will assist any individual who informs us that they need assistance in preparing a request. We may require an individual to provide sufficient information to permit us to provide an account of the existence, use and disclosure of Personal Information.

If an individual successfully demonstrates the inaccuracy or incompleteness of Personal Information, we will amend the information as required. If a challenge is not resolved to the satisfaction of the individual, we will record the substance of the unresolved challenge. Where appropriate the amended information or the existence of the unresolved challenge, as the case may be, will be transmitted to third parties having access to the information in question.

We may refuse a request or not be able to provide access to all the Personal Information we hold about an individual, as permitted or required by law. Where permitted, the reasons for denying access will be provided to the individual upon request. Exceptions may include: information that contains references to other individuals or contains confidential organizational information, where such information cannot be severed from the record; information collected in the course of investigating a breach of an agreement in the course of a formal dispute resolution process; and information that is subject to solicitor-client privilege.

Principle 10 - Challenging Compliance

Any individual can address a challenge concerning our compliance with any of the Privacy Principles to the person designated to be responsible for our privacy compliance.

We will investigate all written complaints. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices. A customer or employee shall be informed of the outcome of the investigation regarding his or her complaint.

An individual is encouraged to use our internal Customer Complaint and Resolution Process to resolve a complaint. However, an individual may also seek advice from the Office of the Privacy Commissioner of Canada at 1.800.282.1376 or info@privcom.gc.ca.

Our goal is to protect your privacy and Personal Information. If you have any questions, comments or concerns about our Privacy Policy or our procedures affecting your Personal Information, please contact us.

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