



Privacy Policy

Accountability

1. CONTACT is responsible for the protection of personal information collected through offices, program activities and website.
2. This policy applies to all staff including employees and volunteers as well as any third-party contractors who may have access to personal information, all of whom sign a confidentiality agreement.
3. CONTACT's Privacy Officer, the Executive Director, leads the implementation of this policy.

Identifying purposes

4. Staff explain the purpose(s) for the collection of personal information wherever possible before asking for it.
5. Staff collect personal information:
 - to assess, develop, improve, evaluate, schedule, deliver and share information about services
 - to satisfy legal, government and regulatory obligations
 - to assess the suitability of staff and potential staff to fulfil a staff role or take on certain responsibilities
 - for fundraising purposes
6. CONTACT uses video cameras to promote safety and to document events that could put people, programs, equipment, and facilities at risk. Public signage is displayed at each of the camera's locations to inform people that cameras are in place. In addition to any contracted organization for IT and programming purposes only, access to camera footage is available only to the Executive Director and designates as required.
7. CONTACT does not sell personal information collected.

Consent & disclosure

8. CONTACT only collects personal information with people's knowledge and consent.

People can choose not to disclose any personal information requested. However, a decision to withhold personal information can result in the inability to undertake the intended activity (e.g., providing services).

9. People can withdraw consent to the collection, use or disclosure of personal information at any time, subject to any legal requirements and reasonable notice.

Limiting collection

10. The amount and type of information that CONTACT collects is limited only to that which is necessary to fulfill the purposes identified.
11. CONTACT asks for the information it requires directly from the individual.
12. CONTACT collects personal information using procedures which are fair, transparent and lawful.

Limiting use, disclosure and retention

13. CONTACT uses personal information only for the purposes for which it was collected, and the person has consented.
14. CONTACT may use personal information without the person's consent, where:
 - a. the organization has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law *and* the information is used for that investigation
 - b. an emergency exists that threatens an individual's life, health or security
 - c. the information is for statistical study or research
 - d. the information is publicly available
 - e. the use is clearly in the individual's interest, and consent is not available in a timely way
 - f. knowledge and consent would compromise the availability or accuracy of the information
 - g. collection is required to investigate a breach of an agreement.
15. CONTACT may *disclose* personal information to third parties, *without* an individual's knowledge and consent, to:
 - a. a lawyer representing CONTACT
 - b. collect a debt owed to CONTACT by the individual
 - c. comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction
 - d. a law enforcement agency in the process of a civil or criminal investigation
 - e. a government agency or department requesting the information
 - f. as required by law.
16. CONTACT may *transfer* personal information to a third party, *without* the individual's knowledge or consent, if the transfer is simply for processing purposes and the third party only uses the information for the purposes for which it was transferred. CONTACT will ensure, by

contractual or other means, that the third party protects the information and uses it only for the purposes for which it was transferred.

17. CONTACT retains personal information only as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws surrounding information retention. Generally, this means information in inactive files is retained for seven years. When all identified purposes for the use of your personal information have been exhausted, staff destroy the information or render it unidentifiable.

Accuracy

18. To ensure the reliable delivery of services and information, CONTACT keeps personal information accurate, complete and up to date.
19. Staff assume that the information that people provide is accurate. If at any time people's personal information changes, staff hope to be informed of it immediately. When requested, staff take appropriate steps to update or correct the personal information.

Safeguards

20. CONTACT employs several safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards include administrative, physical and technological measures such as locked filing cabinets, restricted access to offices, limiting access on a "need to know" basis, requiring staff to maintain clean desks and use of passwords and encryption.
21. CONTACT provides training on these measures to all staff to ensure compliance with this principle.

Openness

22. CONTACT has easily understandable and readily available specific information about its policies relating to the management of personal information. This policy is always available on [CONTACT's website](#).
23. In the event of a policy breach, staff must provide information about the breach and the Privacy Officer's contact information to the person whose information has been breached.

Individual access

24. Upon request, staff inform people of any personal information and what purposes it is used for, if applicable.

Emily McIntosh
Privacy Officer
CONTACT Community Services
39 Victoria Street East
P.O. Box 932 Alliston, Ontario L9R 1W1

The Privacy Officer will respond within thirty (30) days after receipt of your written request or will notify if a longer period is required to fully address the request, provided that an extension of the thirty (30) day period is permitted by applicable privacy laws.

Challenging compliance

25. If, for any reason, a person is concerned about CONTACT's compliance with this Privacy Policy, they may contact the Privacy Officer in writing, by phone or by email:

Emily McIntosh
Privacy Officer
CONTACT Community Services
Community Service Centre South Simcoe
Town Square, 39 Victoria Street East
P.O. Box 932 Alliston, Ontario L9R 1W1
Phone: (705) 435-4900 Email: emily@contactcommunityservices.ca

If they are not satisfied with the way CONTACT has responded to a complaint, they can contact the Privacy Commissioner of Canada.

The Privacy Commissioner of Canada Website: www.priv.gc.ca

112 Kent Street

Place de Ville

Tower B, 3rd Floor

Ottawa, Ontario K1A 1H3

Toll Free 1-800-282-1376

Email notification@priv.gc.ca