

## CHAPTER 15: PERSONAL INFORMATION PROTECTION POLICY

### 15.01 Introduction

- (a) Kin Canada is committed to safeguarding the personal information entrusted to us by our members, our stakeholders and the public. Where legislation exists, that legislation shall apply and the more stringent between federal and provincial will be applicable. This policy outlines the principles and practices followed in protecting personal information.

This policy applies to Kin Canada and to any member or person providing services on our behalf.

### 15.02 Personal Information

#### **What is personal information?**

- (a) Kin Canada uses the PIPEDA definition of personal information. Under PIPEDA, personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:
- (i) age, name, ID numbers, income, ethnic origin, or blood type;
  - (ii) opinions, evaluations, comments, social status, or disciplinary actions; and
  - (iii) Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).

#### **What personal information do we collect?**

- (a) Kin Canada shall collect the personal information needed for the purposes of providing services to our members, stakeholders and the public, including personal information needed to:
- (i) deliver requested products and services;
  - (ii) enrol a member in the Association;
  - (iii) send out association membership information;
  - (iv) meet volunteer screening policy requirements; and
  - (v) determine suitability for a Kin honour or Kin award
- (b) Kin Canada shall inform our members, stakeholders and the public, before or at the time of collecting personal information, of the purposes for which we are collecting the information. Please refer to section 12: National Volunteer Screening Policy located in the National Policy and Procedures of the Association if you have any questions regarding how volunteer screening information is collected, used, stored and disclosed. The only time we don't provide this notification is when members, stakeholders and the public volunteer information for an obvious purpose (For example, producing a credit card to pay a membership fee when the information will be used only to process the payment).

### 15.03 Consent

- (a) Kin Canada will ask for consent to collect, use, store or disclose member personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by provincial or federal law. We may assume your consent in cases where you volunteer information for an obvious purpose.
- (b) Kin Canada will assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.
- (c) Kin Canada will ask for express consent for some purposes and may not be able to provide certain services if the member is unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed in writing (by signing a consent form).
- (d) A member may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. Kin Canada will respect member decisions, but we may not be able to provide members with certain products and services if we do not have the necessary personal information.
- (e) Kin Canada will collect, use, store or disclose member personal information without consent only for the purpose for which the information was collected, except as authorized by law. However, if we wish to use or disclose personal information for any new business purpose, we will ask for consent.

#### How do we safeguard personal information?

- (f) Kin Canada follows the Principles set out in the National Standard of Canada entitled the Model Code for the Protection of Personal Information, as stated under PIPEDA. (Reference: <http://laws-lois.justice.gc.ca/eng/acts/P-8.6/page-11.html#h-26>)
- (g) Kin Canada will make every reasonable effort to ensure that personal information is accurate and complete. Individuals are responsible to notify us if there is a change to their personal information that may affect their relationship with Kin Canada. If a member is aware of an error in our information about them they should advise us of the necessary changes via contact with our Chief Privacy Officer. The Chief Privacy Officer for Kin Canada is our Executive Director.
- (h) Kin Canada will protect personal information in a manner appropriate for the sensitivity of the information and will make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.
- (i) Kin Canada will retain your personal information for as long as necessary to fulfill the legal and business purposes for which it was collected. In some cases, it is necessary for Kin Canada to retain personal information for longer, in order to protect Kin Canada from liability in the event of a dispute.

- (j) Kin Canada will use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

### **Access to records containing personal information**

- (k) Individuals have a right to access their own personal information in a record that is in the custody or under the control of Kin Canada, subject to all federal and provincial legislation requirements. It is an offence to destroy personal information after that an individual has requested it.
- (l) A member may make a request for access to their personal information by writing to the Chief Privacy Officer. The member must provide sufficient information in their request to allow us to identify the information being sought.
- (m) A member may also request information about our use of their personal information and any disclosure of that information to persons outside our organization. In addition, a member may request a correction of an error or omission in their personal information.
- (n) If a request is refused in whole or in part, Kin Canada will provide the reasons for the refusal in writing. In some cases where exceptions to access apply, Kin Canada may withhold that information and provide you with the remainder of the record.
- (o) Kin Canada will respond to an information request within 45 calendar days, unless an extension is required. Kin Canada may charge a reasonable fee to provide information, but not to make a correction. A fee will not be charged when the request is for personal employee information. Kin Canada will advise the member of any fees that may apply before beginning to process their request.

## **15.04 Personal Employee Information**

### **What is personal employee information?**

- (a) Personal employee information is personal information about an employee or volunteer which 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, a performance review, etc.
- (b) Kin Canada can collect, use, store and disclose personal employee information without consent only for the purposes of establishing, managing or ending the employment or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.

### **What personal employee information do we collect, use and disclose?**

- (c) Kin Canada collects, uses and discloses personal employee information in the following circumstances:
  - (i) Determining eligibility for employment or volunteer work, including verifying qualifications and references;
  - (ii) Establishing training and development requirements;
  - (iii) Assessing performance and managing performance issues if they arise;
  - (iv) Administering pay and benefits (paid employees only);

- (v) Processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims) (paid employees only);
  - (vi) Complying with requirements of funding bodies (e.g. lottery grants); and
  - (vii) Complying with applicable laws (e.g. Canada Income Tax Act).
- (d) Kin Canada will only collect, use, store and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes.
- (i) Contact information such as your name, home address, and telephone number;
  - (ii) Criminal background checks;
  - (iii) Employment or volunteer information such as your 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.;
  - (iv) Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc. (paid employees only);
  - (v) Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only); and
  - (vi) Other personal information required for the purposes of our employment or volunteer relationship.
- (e) Kin Canada will inform our employees and volunteers of any new purpose for which Kin Canada will collect, use, or disclose personal employee information, and we will obtain consent, before using or disclosing personal information for purposes unrelated to the employment or volunteer relationship (e.g. such as providing information about our workplace programs).

## 15.05 Questions and Complaints

- (a) If there are questions or concerns about any collection, use, storage or disclosure of personal information by Kin Canada, or about a request for access to your own personal information, please contact the Chief Privacy Officer.

Name: Carmen Preston

Email: [cpreston@kincanada.ca](mailto:cpreston@kincanada.ca)

**All requests for information must be submitted in writing by letter, email or fax.  
No requests will be accepted via social media or text.**