



# Ottawa Safety Council

## Privacy Policy

### Purpose

For the purposes of this Policy, Personal Information is factual or subjective information, recorded or not. It can include, but is not limited to, age, name, addresses, e-mail addresses, financial information, identification numbers, income, health information, or opinions. Personal Information may be in verbal, print or electronic form.

### Applicability

The Ottawa Safety Council (“OSC”) is committed to meeting its obligations under the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) when it is involved in the collection, use and disclosure of Personal Information for commercial purposes.

During the course of our normal activities the OSC frequently gathers and uses Personal Information from parents, guardians, children, students, event participants and others who are involved or interested in our work.

The Personal Information that we collect, use or disclose includes the following:

- First, middle and last name
- Age
- Gender
- Residential or mailing address, including postal code
- Primary and secondary telephone number
- E-mail address
- Emergency contact information
- Permission for alternate pick up (child)
- OHIP number
- Physical or medical conditions
- Drug and Medication record
- Drivers Licence number, class and province of issue
- Driving history
- Make and model of car (if applicable)
- Credit card number and expiry date

This Policy is applied to all Personal Information collected, used or disclosed--whether factual or subjective--about an identifiable individual during the course of commercial activities. The OSC will ensure that individuals, groups, organizations and/or businesses that have been approved, designated or contracted to act for or on its behalf are aware of and in compliance with the principles set forth in this Policy.



## The OSC adheres to the following privacy principles:

### Accountability

The Chief Executive Officer is the Chief Privacy Officer for OSC and so is responsible for ensuring compliance with this Privacy Policy. The Chief Executive Officer may, from time to time, delegate another individual in the agency to act on her behalf.

### Identifying Purposes

The purposes for which the OSC collects, uses and discloses Personal Information will be identified at or before the time the information is collected. In general, the OSC collects, uses and discloses Personal Information to meet the following purposes:

- Reports to the Ministry of Transport on motorcycle instructors certification
- Reports to the Ministry of Transportation for students' licencing information
- Reports to the City of Ottawa with the police reference checks for adult crossing guards
- Reports to Canada Revenue Agency with names and contact information for the Board of Directors and Executive Director
- The list of the Board of Directors (including addresses) to the membership

Subject to the exceptions under PIPEDA, if the OSC has already collected Personal Information but wishes to use or disclose it for a new purpose, individuals will be contacted in advance in order to get fresh consent for that new purpose.

### Consent:

Subject to the exceptions under PIPEDA, the knowledge and consent of the individual are obtained for the collection, use, or disclosure of Personal Information, at the time of collection. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing and it is always required when the Personal Information is particularly confidential or sensitive. Implied consent occurs where consent may reasonably be inferred from the action or inaction of the individual (i.e. by filling out a form).

An individual may withdraw their consent at any time upon reasonable notice, subject to legal or contractual restrictions. The OSC will advise the individual of the consequences of that withdrawal which, in certain circumstances, could include no longer providing child care services.

### Limiting Collection

Collection of Personal Information is limited to that which is necessary for the purposes identified above and/or for the purposes identified at the time of collection.



## Limiting use, disclosure and retention

Personal Information will be used or disclosed only for the purposes for which it was collected except with the consent of the individual or as required by law. From time to time the OSC discloses Personal Information to the following organizations:

- Mitchell & Homes, Chartered Accountants (auditors)
- Collins & Barrow, Chartered Accountants
- Halpenny Insurance Brokers
- City of Ottawa
- Ministry of Transport
- Charities Directorate

Personal Information is retained only as long as necessary to fulfill the purposes listed above or those identified at the time of collection, or as required by law. Once Personal Information is no longer required to fulfill the identified purposes or to comply with legal requirements regarding retention, it will be destroyed or rendered anonymous.

## Accuracy

Personal Information will be kept as accurate, complete and up-to-date as necessary for the purposes for which it is used. Individuals are asked to inform OSC of any updates or changes to their Personal Information.

## Safeguards

Personal Information is protected by security safeguards appropriate to the sensitivity of the information.

- Physical measures (locked filing cabinets, restricting access to offices, alarm systems);
- Technological tools (passwords, encryption, firewalls); and
- Organizational controls (limiting access on a "need-to-know" basis, and confidentiality policies).

## Openness

Information about our policies and practices relating to the management of Personal Information is available on written request to the Chief Privacy Officer.

## Individual Access

Upon request, an individual will be provided with information about the existence, use, and disclosure of his or her Personal Information and will be given access to that information. Requests for access to



Personal Information must be made in writing to the Chief Privacy Officer and acceptable proof of identification will be required. The OSC then has 30 days in which to respond to the request or in which to provide the individual with the legal basis for which the request is denied.

The individual may challenge the accuracy and completeness of his or her Personal Information and have it amended as appropriate.

## Challenging Compliance

If an individual has concerns over the OSC's compliance with this Policy, he or she should address their concern in writing to:

Ottawa Safety Council  
Attn: Privacy Officer  
301 Moodie Drive, Suite 103  
Ottawa, ON K2H 9C4  
t. (613) 238-1513 x. 223 f. (613) 238-8744  
julie.vogt@ottawasafetycouncil.ca

An individual also has the right to contact the Privacy Commissioner in circumstances where an individual has a concern with respect to the OSC's collection, use or disclosure of Personal Information for commercial purposes. An individual can contact the Office of the Privacy Commissioner of Canada at:

112 Kent Street  
Place de Ville, Tower B, 3rd Floor  
Ottawa, Ontario  
K1A 1H3

Toll-free: 1-800-282-1376  
Phone: (613) 995-8210  
Fax: (613) 947-6850  
TTY: (613) 992-9190