



# CBSR Privacy Policy

## GENERAL PRINCIPLES:

At Canadian Business for Social Responsibility (CBSR) we are demonstrating our commitment to privacy by complying with the laws and regulations under the applicable privacy laws in Canada and its provinces in which we operate, including the *Personal Information Protection Act* (PIPA) and the *Personal Information Protection and Electronic Documents Act* (PIPEDA). The purpose of this document is to outline CBSR's privacy statement and inform you about the practices and procedures of CBSR handling personal information that is collected.

This policy applies to the use of personally identifiable information about an individual. This Policy **does not apply to the information collected, used or disclosed with respect to corporate or commercial entities that are members, prospective members, clients, prospective clients and partners.**

As such, this policy is intended to apply to information collected, used or disclosed about CBSR's employees, associates, individual subcontractors, individual volunteers and other individuals about whom CBSR receives personal information that is subject to the applicable privacy laws. While those persons are not all employees of CBSR, for convenience only, in this policy we collectively refer to all of such individuals as "employees".

## DEFINITIONS:

"Collection" - the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

"Consent" - involves voluntary agreement with what is being done or proposed. Consent may be express or implied. Express consent can be given orally or in writing, it is unequivocal, and does not require any inference on the part of CBSR. Implied consent exists when CBSR can reasonably infer consent based upon the action or inaction of an employee. There are also occasions where privacy legislation will deem consent.

"Disclosure" - the act of making personal information available to others outside of CBSR.

"Use" - the treatment and handling of personal information by and within CBSR.

**"Personal Information" - information about an identifiable individual that is recorded in any form; excluding the individual's name, business title, business address, business email, business fax and business phone number.**

"Third Party" - an individual or organization other than CBSR and its fund advisors.

## SECTION 1: CBSR'S ACCOUNTABILITY

1.0 CBSR is accountable for the protection of personal information. While senior management is ultimately accountable for the protection of personal information, the day-to-day monitoring for compliance may be delegated to other staff.



1.1 The overall responsibility for the protection of personal information and compliance with this policy rests with CBSR's Privacy Officer. The Privacy Officer will be appointed from time to time by the President and CEO.

1.2 CBSR is committed to ensuring that reasonable and appropriate security measures are employed in the transfer of sensitive information.

1.3 CBSR is not accountable for any damages suffered when employees transmit their own personal information through e-mail or wireless communication or when CBSR transmits information at the request of an employee. Confidentiality and security are not assured when using such methods of communication.

1.4 CBSR has developed policies and procedures to: protect personal information; receive and respond to complaints and inquiries; train staff regarding the policies and procedures; communicate the policies and procedures to our employees.

## **SECTION 2: IDENTIFYING THE PURPOSES FOR COLLECTION OF PERSONAL INFORMATION**

2.0 CBSR will communicate the purposes for which information is being collected, either orally or in writing.

2.1 CBSR collects personal information for the following purposes only:

- To commence, manage and conclude employment relationships;
- To manage the records and benefits program of employees;
- To identify, understand and respond to the preferences, needs and requirements of employees;
- To promote the business and educational goals of CBSR;
- To manage the records of a volunteer;
- To manage the records of a subcontractor;
- To meet regulatory requirements;

## **SECTION 3: NOTICE TO EMPLOYEES**

3.0 CBSR may collect, use and disclose employees' personal information for purposes associated with the commencement, management and conclusion of employment relationships by providing notice of such collection, use or disclosure. CBSR will give notice to its employees of the purposes for which it is collecting, using or disclosing any personal information except as detailed in this code or permitted by law. Notice will be given before or at the time of collection, use or disclosure. CBSR will make reasonable efforts to ensure that employees understand how their personal information will be used and disclosed.

3.1 CBSR may also seek consent to collect, use or disclose employees' personal information. An employee's consent can be express, implied, or given through an authorized representative such as a lawyer, agent or broker. An employee can withdraw consent at anytime; with certain exceptions (see section 3.3).

CBSR may collect, use or disclose personal information without the employee's knowledge or consent in the following circumstances:



- When such collection, use or disclosure is permitted or required by law
- When acting in an emergency that threatens an individual's life, health, or personal security
  - When certain information is publicly available
  - When we require legal advice from a lawyer
  - When we need to collect a debt from an employee
  - When we are investigating a potential breach of a law, policy or agreement
  - When we need to deal with an anticipated breach of law.

3.2 Notice and consent may be given orally, in writing, or electronically. For example, depending on the sensitivity of the information, notice and consent can be expressed over the telephone when information is being collected; electronically when submitting an agreement, application, or other information; in writing when signing an agreement or application form; when using a product or service; when indicating knowledge and consent by means of a check-off box.

3.3 Subject to contractual or legal arrangements and obligations, employees may withdraw or refuse consent provided that CBSR is given reasonable notice.

#### **SECTION 4: LIMITS FOR COLLECTING PERSONAL INFORMATION**

4.0 CBSR will only collect personal information for the purposes identified. CBSR will use methods that are lawful and will not collect information indiscriminately.

#### **SECTION 5: LIMITS FOR USING, DISCLOSING, AND KEEPING PERSONAL INFORMATION**

5.0 Employee information will only be used or disclosed for the purpose for which it was collected. CBSR will not use personal information for any additional purpose unless CBSR gives notice or seeks consent to do so, as appropriate.

5.1 CBSR will not share information with individuals or institutions external to CBSR, except for the following:

In order to maintain cost effectiveness and continue to provide a high level of service, we use third parties to provide some services on our behalf. CBSR will require these third parties to enter into confidentiality agreements prohibiting their use of personal information other than the purpose for which they are providing the service.

Canadian Business of Social Responsibility may periodically employ outside organizations to do administrative tasks such as mail outs or technical services that involve the use of employee personal information. If an outside body is employed by CBSR, CBSR will ensure that appropriate security undertakings, such as confidentiality clauses in contractual arrangements, are employed to protect the transfer and use of personal information restricting such use to use for the purpose which the third party is providing the service.

5.3 CBSR will retain the personal information of an employee only as long as necessary or expected to be necessary for the identified purposes, legitimate business purposes or as required by legislation.



## **SECTION 6: ACCURACY**

6.0 CBSR will make reasonable efforts to ensure that an employee's personal information is as accurate, complete, and current as required for the purposes for which it was collected. In some cases, CBSR relies on its employees to ensure that certain information, such as the employee address or telephone number, is current, complete, and accurate.

6.1 CBSR will update information as necessary to fulfill the purposes for which it was collected or if it is required to maintain an active account.

6.2 Employees may request amendments to the records at CBSR in order to ensure the accuracy and completeness of their personal information. If an employee makes such a request but CBSR does not make the amendment, CBSR will note the request on the employee's file.

## **SECTION 7: SAFEGUARDING PERSONAL INFORMATION**

7.0 CBSR is committed to the safekeeping of employee personal information in order to prevent its loss, theft, or unauthorized access, disclosure, duplication, use, or modification.

7.1 CBSR will employ appropriate security measures to protect the information, depending on the sensitivity of the information. The measures may include, for example, the physical security of offices and data centres, and electronic security measures such as passwords, encryption, and personal identification numbers.

7.2 CBSR will use appropriate security measures when disposing of employee personal information.

7.3 The development of CBSR's policies and procedures for the protection of personal information is an ongoing process. Changes in technology necessitate that CBSR continually develops, updates, and reviews information protection guidelines and controls to ensure ongoing information security.

## **SECTION 8: AVAILABILITY OF POLICIES AND PROCEDURES**

8.0 CBSR is open about the policies and procedures it uses to protect employees' personal information. Information about these policies and procedures will be made available to employees either electronically or in written format in plain language. However, to ensure the integrity of our security procedures and business methods, CBSR may refuse to publicly disclose certain information.

8.1 CBSR will make the following information available:

The name, title and address of the person accountable for the policies and procedures and to whom complaints or inquiries can be forwarded;

A description of the type of personal information held by CBSR, including a general account of its use (after verification of the identity requesting their personal information);

A copy of any brochures or other information that explain the policies and procedures;

## **SECTION 9: PROVIDING EMPLOYEES ACCESS TO PERSONAL INFORMATION**

9.0 Employees have the right to access their personal information held by CBSR. Upon request, CBSR will, within a reasonable time period, tell the employee what personal information about the



employee it has, what it is being used for, and to whom it has been disclosed if applicable and within the time period for which records are available. The information will be made available in an appropriate format for employees with a sensory disability.

9.1 Employees may be asked to be specific about the information they would like to access and to submit their request in writing to the privacy officer at CBSR.

9.2 Employees will be required to provide personal information for identification and to enable CBSR to provide an account of the existence, use, and disclosure of personal information.

9.3 CBSR will make the information available within 30 days, or provide written notice of extension where additional time is required to fulfill the request.

When additional time is required, CBSR will, no later than 30 days after the date of the request, send a notice of extension to the employee, advising of the new time limit, and the reasons for extending the time limit.

9.4 CBSR may require an individual to provide funds to cover the reasonable cost to retrieve and copy personal information that is to be accessed. The cost will vary with the type and amount of information requested. No charge is applicable to access requests made by employees.

9.5 If a request is refused, CBSR will notify the employee in writing, documenting the reasons for refusal and resources for redress available to the employee.

9.6 In certain situations, CBSR may not be able to provide access to any or all personal information about an employee. In such cases, CBSR will explain the reasons it cannot provide the requested information, and identify resources for recourse available to the employee. The reasons for not providing information may include information that would threaten the life or security of another individual, generated in a formal dispute resolution process, that contains references to or personal information of other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons, and that is subject to solicitor-client or litigation privilege.

## **SECTION 10: COMPLIANCE AND COMPLAINTS**

10.0 Employees are to direct any complaints, concerns or questions regarding this privacy policy in writing to the Privacy Officer. If the Privacy Officer is unable to address the employee or volunteer concerns, the issue can be referred to the President and CEO. The employee may also write to the applicable Privacy Commissioner.

10.1 Complaint and dispute resolution processes will be regularly monitored for effectiveness, fairness, impartiality, confidentiality, ease of use, and timeliness.

10.2 Contact Information:

CBSR  
Attention: Azar Pourian  
Privacy Officer  
205 – 535 Thurlow Street  
Vancouver BC



V6B 3L2

Email: [info@cbsr.ca](mailto:info@cbsr.ca)  
Tel. 604-323-2714

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