

# **CUMULATIVE ENVIRONMENTAL MANAGEMENT ASSOCIATION**

## **- WOOD BUFFALO REGION (CEMA)**

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### **PRIVACY and CONFIDENTIALITY POLICY**

#### **PURPOSE**

CEMA is committed to maintaining the privacy, security and accuracy of the personal information we collect, use and disclose in accordance with applicable legislation. This privacy and confidentiality policy is a statement of principles and guidelines concerning the protection of personal information of our Member organizations, service providers and staff. The following outlines CEMA's principles regarding privacy:

#### **ACCOUNTABILITY:**

CEMA is responsible for protecting all information under its control. It has designated a staff member to be responsible for CEMA's adherence to the federal *Personal Information Protection and Electronic Documents Act*.

#### **IDENTIFYING PURPOSES:**

CEMA will clearly identify the primary use of the personal information and ask permission before any secondary use of that personal information. Permission forms, completed at the time of registration in CEMA, are kept in a locked location.

CEMA collects information:

- For record keeping, in the case of our funders,
- For payroll and human resource records, in the case of our employees; and
- For organization involvement and meeting preparation, in the case of our Member organizations

#### **CONSENT:**

CEMA recognizes that Member organizations have control over the use of their information.

- a) All new Members are given the opportunity to decline to have their name or other information used for any external purposes.
- b) Current Members have the opportunity to decline to have their names or other information used for external purposes, by stating their desire on their annual re-registration.

#### **LIMITED USAGE:**

CEMA limits the use of collected information to direct needs within the organization. CEMA does not share gathered information with any other organizations.

#### **ACCURACY:**

CEMA will ensure that information is accurate, complete and up-to date as is necessary for the purpose of continuing its contact with its Member organizations and employees.

- a) CEMA will endeavour to keep records up to date.
- b) CEMA will ensure that any requests regarding limiting the use of information will be added to the record promptly.
- c) CEMA will further safeguard records with contact information that is deemed not in the public domain i.e. unlisted telephone numbers etc.

#### **SAFEGUARDS:**

CEMA assures the security and confidentiality of private information.

- a) The CEMA database has electronic security passwords. Access to the database is limited to select CEMA staff during office hours and locked up when the office is closed.
- b) The CEMA computer system also has appropriate security systems in place.
- c) Any paper files with confidential financial information are stored in locked filing cabinets.
- d) CEMA staff has signed a Code of Ethics.
- e) If CEMA outsources data processing or enters into contracts that require handling of personal information, CEMA will have written assurances that the firm abides by the law

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- f) Confidential personal information is disposed of properly to prevent unauthorized use.

### **ACCESS:**

CEMA recognizes that Member organizations and employees have the right to access their information.

- a) All CEMA Members and employees have the right to see their own records and to challenge their accuracy.
- b) CEMA will provide information about the potential use of personal information upon request.
- c) All Member organizations and employees have the right to know the source obtaining their name.

### **OPENESS and PROPER HANDLING OF COMPLAINTS:**

CEMA pledges to respond immediately to any queries about personal information or complaints regarding the use of personal information. CEMA will also make readily available our privacy policies and practices relating to the management of personal information upon request. Information requests must be fulfilled within 30 days. The information will contain:

- a) The name and title of the CEMA staff person accountable for the organization's policies and to whom complaints/inquires are forwarded;
- b) The means of gaining access to personal information held in CEMA donor files;
- c) A description of the type of information held by the organization and its intended use
- d) A description of what information is made available

### **WHAT INFORMATION IS COLLECTED and HOW IT IS USED:**

The information we collect comes directly from our Member organizations, Vendors and our employees. In general, we collect two types of information:

- Personal information; and
- Anonymous information

### **PERSONAL INFORMATION:**

We collect this information primarily for our payroll records, Member records, funding records and Vendor payment. The information collected and maintained in the CEMA files include:

- Company name, mailing address, e-mail address, telephone number and payment history, all employee information for both salary payment and government reporting

### **ANONYMOUS INFORMATION:**

We routinely collect "anonymous information" which is information that cannot be directly traced back to specific organizations. For example, our web servers may electronically collect information from website visitors. This type of anonymous information might typically include:

- Specific website pages visited, number of visitors, type of web browser being used etc.

The only time personal information is collected from our website is to provide a password and user name for entry to our Members only site. This information is not retained.

### **DISCLOSURE of INFORMATION to OUTSIDE PARTIES:**

We strive to keep your personal information private at all times. Occasionally, we may need to undergo analysis on our database systems by a third party in which case we require and obtain written assurances that the firm abides by safeguard regulations set out in the privacy law.

### **ACCESSING and AMENDING YOUR INFORMATION:**

As a Member organizations/Employee you have the right to access, verify and amend personal information held in our records. Please provide CEMA with a written request in order to access your record for review (form attached) or call us directly at 1-780-799-3947.

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To help us keep your personal information current, we encourage you to make corrections whenever necessary. To amend personal contact information contained in your file please fill out the form attached or call us directly at 1-780-799-3947.

### **CONTACT INFORMATION:**

If you have any questions about CEMA's privacy policy outlined in this document or have a concern or complaint in regards to our information handling practices please call us directly at 1-780-799-3947.

### **ADMINISTRATION:**

This policy as approved and amended from time to time, is in force until it is rescinded or replaced by the Members.

### **Approved:**

This policy was approved by the Members on: December 09, 2009.

### **Amended:**

This policy was amended by the Members as follows:

Revision Number: 1     Date: September 23, 2010