

Subject: <b>Personal Information Protection Policy</b>	Approved By:
Creation Date: 13/01/04	Revision Date:

## GENERAL INFORMATION

As of January 1, 2004 the *Personal Information Protection and Electronic Documents Act* (PIPEDA) came into force. This Act provides for the protection of the employee and consumer and the collection of personal information relating to both.

GLIAA is responsible for information under its control. The Director, Finance & Human Resources has been named as Compliance Officer and alternate is the President & CEO.

Based on this policy, personal information is not to be shared with a third party and inquiries that would require disclosure of personal information are to be referred to the Compliance Officer.

## PURPOSES

Personal information for an employee is required to complete the hiring process, administration of payroll, administration of benefits and other personnel functions. The employee will be informed as to the reason behind the request for personal information and by signing the *New Employee Information Form* provides consent to retain this information. Information will not be disclosed to a third party unless for legitimate purposes i.e. payroll provider, benefit administrator, etc.

Personal information may be collected in the course of commercial business and is to be limited to payment and credit information

## CONSENT & COLLECTION

The knowledge and consent of an individual is required for the collection, use or disclosure of personal information, except where inappropriate. At the time of hire all personal information will be collected on a *New Employee Information Form* and the employee will sign as acknowledgement. Should additional personal information be collected, used or disclosed consent will be provided at the time of collection either orally or written.

The collection, use and disclosure of personal information in the course of any commercial activity is covered by the Act as well. This would cover details for invoicing and payment information (personal cheques and credit cards) for invoices and parking fees. Information obtained through surveillance cameras would also be covered under the Act.

The collection of personal information shall be limited to the amount and type necessary for the purposes identified by GLIAA. Information shall be collected by fair and lawful means.

## USE & DISCLOSURE

Personal information shall not be used or disclosed for purposes other than those for which it was collected except with the consent of the individual or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.

## ACCURACY

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Personal information shall be accurate, complete and up-to-date as is necessary for the purposes for which it is being used. Personal information will not be routinely updated unless it is necessary for the purposes, which it is to be used.

## **SAFEGUARDS, OPENNESS & ACCESS**

Employee files are maintained in a locked, fireproof filing cabinet located in the office of the Director, Finance & Human Resources. The Director, Finance & Human Resources and the President & CEO have access to this cabinet. The employee may request access to their employee file based on the provisions of the Collective Agreement.

Obsolete employee files will be retained as per legislation and maintained in a locked cabinet in the storage room. Access will be limited to the Director, Finance & Human Resources and the President & CEO.

Payroll files and related information are under the custody of the Finance & Administrative Coordinator. Access is limited to the custodian and the Director, Finance & Human Resources. All information is kept in a locked filing cabinet and/or on a password protected computer system.

Consumers and suppliers personal information is maintained by the Contract Services Supervisor and/or the Finance & Administrative Coordinator. This information is to be kept in filing cabinets that are not accessible by others.

Information maintained in individual computer files is to be safeguarded using password protection. Electronic information is not only secure within the organization but also secured utilizing firewalls against unauthorized external access. Any personal information no longer valid or necessary is to be destroyed utilizing a shredder or deleted from the computer file.

GLIAA will make readily available to individuals specific information about its policies and practices relating to the management of personal information. A copy of this policy will be posted on GLIAA's website. All inquires are to be referred to the Compliance Officer.