## PROTECTION OF PERSONAL INFORMATION POLICY

[Organization Name] is committed to upholding the privacy of private and identifiable information. While [Organization Name] is not subject to the protection obligations outlined in *the Personal Information Protection and Electronic Documents Act* (PIPEDA), this policy is based upon PIPEDA’s 10 Fair Information Principles and is intended to ensure the safety of employee personal information.

DEFINITIONS

As defined by PIPEDA, personal information includes: any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

* Age, name, ID numbers, income, ethnic origin, or blood type
* Opinions, evaluations, comments, social status, or disciplinary actions
* 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).

Ten Fair Information Principles

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

POLICY

[Organization Name] will ensure that any private employee information that is collected adheres to the principles outlined below:

1. **Accountability**: [Organization Name] is responsible for all employee personal information under its control and will ensure its accountability to the 10 Fair Information Principles.
2. **Identifying purposes**: [Organization Name] will always identify to employees why their personal information is being collected.
3. **Consent**: Employee consent is required for the collection, use, or disclosure of employee information, as appropriate.
4. **Limiting collection**: [Organization Name] will only collect the personal employee information that is required for the administration of pay, benefits, and other human resource activities. This information will always be collected in fair and legal ways.
5. **Limiting use, disclosure, and retention**: Unless required by law, all private employee information collected by [Organization Name] will only be used for the purposes for which it was collected. Private employee information will only be retained as necessary to serve the purposes for which it was collected.
6. **Accuracy**: [Organization Name] will maintain personal employee information as accurate, complete, and as up to date as possible. [Organization Name] may request periodic updates from its employees to ensure that the information on file is accurate.
7. **Safeguards**: [Organization Name] will protect any personal employee information it has collected, either by locked filing cabinets, encrypted drives, or any other means necessary to ensure the privacy of the information.
8. **Openness**: [Organization Name] will disclose its purposes for the collection of employee information and will have this information available upon request from employees.
9. **Individual access**: Employees of [Organization Name] have the right to view what personal employee information has been retained. Further, employees may challenge the accuracy of this information and make modifications to the information, as necessary.
10. **Challenging compliance**: While [Organization Name] is not subject to the compliance regulations under PIPEDA, it will endeavour to meet or exceed the principles established by the Act. Should an employee bring forward a way that [Organization Name] could improve the safety of personal employee information, they may bring it forward to the (Insert title).