# Alberta Association of Police Governance Personal Information Protection Policy

The Alberta Association of Police Governance (AAPG) is committed to safeguarding the personal information entrusted to us by our members, newsletter subscribers, conference attendees, conference attendee guests, and other individuals.

We manage conference attendee's personal information in accordance with Alberta's *Personal Information Protection Act*.

This policy outlines the principles and practices we follow in protecting personal information.

This policy applies to the Alberta Association of Police Governance and to any person providing services on our behalf. A copy of this policy is provided to any individual on request.

#### What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, special dietary needs and similar information.

#### What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- deliver requested products and services
- enroll an individual in a program or event, such as our conference
- send out association membership and renewal information
- send our out newsletter
- meal planning for our conference and other events

We normally collect personal information directly from members, newsletter subscribers and conference attendees. We may collect your information from other persons with your consent or as authorized by law.

We inform our members, newsletter subscribers and conference attendees, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when an individual volunteers information for an obvious purpose (for example, the personal information included on a cheque provided to pay a membership fee, conference fee or conference guest fee when the information will be used only to process the payment).

#### Consent

We ask for consent to collect, use or disclose personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask members, newsletter subscribers and conference attendees to provide their consent through the knowledge that submitting their information through our webform provides consent for the use of the information. Submitting the form provides express consent.

A member, newsletter subscriber and conference attendee may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health or safety.

#### How do we use and disclose personal information?

We use and disclose client personal information only for the purpose for which the information was collected, except as authorized by law. For example, we may use member, newsletter subscriber and conference attendee contact information to deliver our annual conference or email our newsletter.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. We may not seek consent if the law allows this (e.g. the law allows organizations to use personal information without consent for the purpose of collecting a debt).

#### What is personal contractor information?

Personal contract information is personal information about a contractor which is collected, used or disclosed solely for the purposes of establishing, managing or terminating a contractor relationship. Personal contractor information may, in some circumstances, include a home phone number, home address, Canada Revenue Agency issues Business or GST number, and a performance review, as well as similar information.

We can collect, use and disclose your personal contractor information without your consent only for the purposes of establishing, managing or ending the contractor relationship.

#### What personal contractor information do we collect, use and disclose?

We collect, use and disclose personal contractor information to meet the following purposes:

- Determining eligibility for contractor work, including verifying qualifications and references
- Assessing performance and managing performance issues if they arise
- Administering receipt of invoices and invoice payments
- Complying with requirements of funding bodies (e.g. government grants)

We only collect, use and disclose the amount and type of personal contractor information that is reasonable to meet the above purposes. The following is a list of personal contractor information that we may collect, use and disclose to meet those purposes.

- Contact information such as your name, home address, telephone number
- Criminal background checks
- Contractor, employment or volunteer information such as your resume (including educational background, work history and references), reference information and interview notes, letters of offer, quotes, contracts, policy acknowledgement forms, background verification information, performance evaluations, emergency contacts, etc.
- Financial information, such as Canada Revenue Agency Business and GST numbers
- Personal information included on invoices
- Amounts paid in satisfaction of the contractor relationship
- Other personal information required for the purposes of our contractor relationship

We will inform our contractors of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

# What information do we provide individuals or organizations seeking references for our contractors, past or present?

In some cases, after your contractor relationship with us ends, we will be contacted by other individuals or organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our contractors to other organizations who request references without consent. The personal information we normally provide in a reference includes:

- Confirmation that an individual was a contractor, including the work done and date range of the contractor relationship
- General information about a contractor's work and information about the quality of the work done in fulfillment of the contractor relationship

#### How do we safeguard personal information?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals organizations to notify us if there is a change to the personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction. We request updated information each year from our members, along with our member renewal notice.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including confidential or micro-cut shredding or paper records and deleting electronic records, as well as destroying old hard drives.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

#### Access to records containing personal information

Where information is collected under the *Personal Information Protection Act*, individuals have a right to access their own personal information in a record that is in the custody or under the control of the Alberta Association of Police Governance, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

Where information is collected under the *Personal Information Protection Act*, you may make a request for access to your personal information by writing to the Executive Director of our association. You must provide sufficient information in your request to allow us to identify the information you are seeking.

Where information is collected under the *Personal Information Protection Act*, you may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

Where information is collected under the *Personal Information Protection Act*, we will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

#### **Questions and complaints**

If you have a question or concern about any collection, use or disclosure of personal information by the Alberta Association of Police Governance, or about a request for access to your own personal information where information is collected under the *Personal Information Protection Act*, please contact the Executive Director of our association via email at <a href="mailto:admin@aapg.ca">admin@aapg.ca</a> or mail at

P.O. Box 36098 Lakeview Post Office Calgary, Alberta T3E 7C6

If you are not satisfied with the response you receive, you may contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 - 6 Avenue, SW Calgary, Alberta T2P 3W2

Phone: 403-297-2728 Toll Free: 1-888-878-4044 Email: generalinfo@oipc.ab.ca Website: www.oipc.ab.ca