



PRIVACY PROTECTION AND CONFIDENTIALITY POLICY

Preamble

Community Futures is committed to ensuring confidentiality and protecting the privacy of its volunteers, clients, employees and website visitors in accordance with the Canadian Standards Association Model Code for the Protection of Personal Information and **Personal Information Protection Act** (PIPA) and **Freedom of Information and Protection of Privacy Act** (FOIPPA) and applicable privacy legislation. As such CFTC has developed policy to support the confidentiality and privacy as a measure of good governance.

Notwithstanding Community Futures will seek written or oral consent for all personal information it collects, uses and discloses prior to or at the time of collection, except in circumstances when the Personal Information Protection Act or other law authorizes the collection, use or disclosure without consent or deems the collection, use or disclosure to be consented to. Community Futures may rely on an implied consent when the purpose would be considered obvious to a reasonable person and the individual voluntarily provides the personal information for that purpose.

Community Futures will not collect, use or disclose personal information for any purpose other than that for which consent has been provided.

Purpose

The purpose of this policy is to govern the collection, use and disclosure of personal information in a manner that recognizes both the right of individuals to protect their personal information and the need of organizations to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances.

CFTC fully supports and respects the privacy of its Board of Directors, clients, contractors, agents, and employees as provided for within the Personal Information Protection and Electronic Documents (PIPED) Act as enhanced by the Government of Canada and the Personal Information Protection Act (PIPA) as enacted by the Province of British Columbia, Office of the Information and Privacy Commissioner, October 2003 and updated in June of 2014.

Accordingly, the privacy of any person associated with CFTC is assured as detailed in this policy statement and specifically, as follows:

- That in meeting its responsibilities under the Personal Information Protection Act, CFTC considers what a reasonable person would consider appropriate in the circumstances.
- That the organization is responsible for personal information under its control, including personal information that is not in the custody of the organization.
- That CFTC has appointed its General Manager as the designate responsible for ensuring that the organization complies with this Act.
- That the General Manager may delegate to another individual the duty conferred by that designation.
- That CFTC has developed and follows policies and practices that are necessary for the organization to meet the obligations of the organization under the Act.
- That CFTC has developed a process to respond to complaints that may arise respecting the application of this Act, and makes information available on request about the policies and practices and the complaint process.

Intent and information usage:

- To establish and maintain a relationship with its clients and to provide services to those individuals, staff, board members and volunteers;
- To provide information about products, services, training resources and events;
- To administer CFTC's services, to assess the quality and quantity of CFTC's services, conferences, to maintain adequate accounting and tax records, and to have information in such form as CFTC may reasonably require for our business needs;
- To meet legal, regulatory and governmental requirements (including, for example, the requirements of Western Economic Diversification Canada (WD) and the Ministry of Social Development and Social Innovation, (MSDSI) as our primary funding agencies, to detect and prevent frauds and to protect the interests of our staff, board members, volunteers and clients to our funding partners.
- To achieve any other purpose to which consent has been given. i.e. loans and payroll

Limiting Collection, Use and Disclosure:

Community Futures will limit the collection, use and disclosure of personal information to that reasonably required in order for Community Futures to carry on its business. Community Futures will limit the use or disclosure of personal information only for the purpose for which it was collected, unless the individual consents, or the use or disclosure is authorized to meet legal requirements and regulatory orders.

Community Futures will protect the confidential nature of personal information when dealing with third parties and other organizations, and Community Futures will require them to meet the same standard as it does when dealing with information it has placed in their trust. Community Futures requires that the third party and other organizations to which personal information has been disclosed to use personal information only for the purposes for which it was initially disclosed.

Each contractor, employee, volunteer associated with CFTC shall ensure that all personal information about its clients will be kept strictly confidential and agrees that:

- No personal information on client's, the organization, employees or board shall be made available and no reports shall be distributed to outside sources unless the affected person/business has given written permission to the General Manager, or Chairperson of the Board, or such other duly appointed person, for such information to be disclosed.
- Any information received as an employee, contractor, board member or volunteer will be held in the strictest confidence and shall not, at any time, be disclosed to any person, unless required by law. Nor shall any information regarding the business or affairs of the CFTC was obtained through or as a direct or indirect result of his/her association with the Corporation be disclosed to any other person.
- All information gathered and material produced by contractor's, employees and volunteers will be deemed as the property of CFTC and will be considered as the intellectual property of CFTC and such all material will not be copied, distributed or used outside the parameters of CFTC.